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**From:** PANTER Susan (HR) <Susan.PANTER@ec.europa.eu>  
**Sent:** Tuesday, May 12, 2020 11:48 PM  
**To:** MUELLER David (CAB-HAHN) <David.MUELLER@ec.europa.eu>

**Subject:** Special Advisers - Exercise 2020

Dear David,

This message relates to Special Advisers to the Commissioners (exercise 2020) and the analysis carried out by DG HR about the absence of conflict of interest.

The examination carried out by HR is done on the basis of the documents submitted by the Cabinets, in particular the CV, the declarations made by the Special Advisers and the statement of assurance made by the Cabinet concerned.

To sum up, we did not identify a serious risk of conflict of interest, but rather in some instances a potential risk of perception of conflict of interest, with one more serious [REDACTED]. We therefore propose to raise the awareness of the Cabinets concerned, essentially in terms of recommendations of prudence (choosing option B with indication of mitigating measure(s)). We recommend such a follow-up in 11 cases. [REDACTED]

The table below summarises our findings and the draft messages to be sent by DG HR are attached at the end of this message. I would appreciate receiving your agreement to send the draft messages out as soon as possible.

[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

[illegible]



As the one-month prior information to the Budgetary Authority was launched on 24 April, we could be ready for the designations to be decided by the College on 27 May 2020. In this case, the contracts could take effect on 1 June.

All the best,

Sue

DRAFT EMAILS TO BE SENT BY DG HR TO THE CABINETS CONCERNED.

[REDACTED]

Cabinet BORRELL: Ms Nathalie TOCCI

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Annex :

<p><b>STATEMENT OF ASSURANCE FROM HR/VP JOSEP BORRELL OF NON-CONFLICT OF INTEREST WITH A VIEW TO THE APPOINTMENT OF Ms NATHALIE TOCCI AS A SPECIAL ADVISER TO THE EUROPEAN COMMISSION</b></p>
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**B/** I, the undersigned, Mr Pedro SERRANO, hereby declare that, notwithstanding the declaration of activities and the sworn statement declaring that there is no conflict of interest presented by Ms Nathalie TOCCI, a perception of potential risk for the Commission's good name resulting from her activities for the Istituto Affari Internazionali and her independent and non-executive activities in Edison may still be there. Therefore, HR/VP BORRELL in offering a contract to Ms Nathalie TOCCI wishes to make it subject to a number of mitigating measures in order to reduce the perception of a potential conflict of interest.

In particular, it will be ensured that Ms Nathalie TOCCI does, in her capacity as Special Adviser, not have any influence on Commission decisions concerning the funding of Istituto Affari Internazionali. In addition, while acting as a Special Adviser, Ms Nathalie TOCCI shall abstain from having any bilateral contact with DG ENER and from intervening in the field of activities of EDISON. More generally, she shall abstain from any lobbying or advocacy with the Commission Services linked to her activities in EDISON.

**Please date and sign your declaration:**

Brussels, [Date]

The Head of Cabinet

**Signature:**