



EUROPEAN COMMISSION

Directorate-General for Trade
Directorate A – Resources and economics analysis

The Director

Brussels, 26. 11. 2009
TRADE/A1/CDG/is/D(2009)10958

NOTE FOR THE ATTENTION ALL DG TRADE STAFF

Subject: Ethics and (potential) conflicts of interest

Following the IAS audit on *Ethics in the Commission* completed towards the end of 2008, DG TRADE finalised its ethics action plan. As part of this action plan a Steering Committee was set up by the Director General to contribute to the definition, and oversee the implementation, of ethics policy within DG TRADE. The action plan also contained a specific action in relation to awareness raising in the area of *conflicts of interest* and how potential conflicts of interest should be managed within DG TRADE. During its meeting of 16/07/09¹ the Steering Committee reflected on the best way to respond to the audit recommendation to take a more proactive approach to the management of potential conflicts of interest and how we might best achieve the intended objectives of ensuring that staff are:

1. Adequately aware of the rules concerning potential conflicts of interest;
2. Know which steps should be undertaken in the event that they are confronted with such a (potential) conflict.

In this perspective I am therefore writing to you all to recall the relevant rules and set out how this issue will be dealt with in DG TRADE from now on.

You are all no doubt aware that upon accepting employment with the European Commission we are subject to the terms and regulations of the Staff Regulations (SR), which set out our rights and duties as European Officials. In particular it should be noted that under article 11a of the SR², potential conflicts of interest³ must be avoided, and in the event that you are aware of any potential conflict a declaration to this effect should be made using the standard declaration form so that management may assess the situation and take any mitigating measures as appropriate.

¹ See Steering Committee meeting minutes of 16/07/09


² Under article 11 of the Conditions of employment of other servants of the Communities (CEOS) this article also applies by analogy to other agents.

³ A conflict of interest is defined as: *a matter in which, directly or indirectly, he [the official] has any*

In order to promote awareness of this issue and to avoid potential conflicts of interest – and in line with our Code on ethics and integrity – vacancy notices for posts within DG TRADE will from now on indicate that potential candidates (either internally or from elsewhere in the Commission) may be required to explicitly confirm to the HoU of A1 (resources) that the post in question does not raise any potential conflict of interest for them **before** accepting the post.

Additionally all staff will be formally reminded of their ethical obligations under article 11a of the SR at least once a year and of their obligation to complete the standard declaration in the event of any doubt.

Finally I would like to take this opportunity to draw your attention to our comprehensive intranet page on ethics which provides links to specific guidance on ethics issues as well as other useful related information. In the event that you have any particular questions on this issue, please do not hesitate to contact our Ethics Compliance Officer, Caroline de Graef (68518).



Jens SCHAPS