



EUROPEAN COMMISSION

Directorate-General for Trade

The Director General

Brussels, 24 March, 2009  
TRADE/A1/CDG/dpa/D(2009) 2625

**NOTE FOR THE ATTENTION OF DG TRADE STAFF**

**Subject: Ethics – DG TRADE's gifts/hospitality register**

As you are aware all Commission staff are required to request permission to keep gifts with a value of €50 or more and such gifts should be recorded in a local DG Gifts register. In order to promote a more informed review, and thus a better control, of requests to accept gifts it has been decided that the DG TRADE gifts register should be managed at the **Directorate** level as under normal circumstances it is our line managers who are best placed to assess whether such acceptance could give rise to, or be perceived to give rise to, a conflict of interests. To this end all Directors have now been formally appointed as Appointing Authorities (AA) for the purposes of approving the acceptance of gifts for staff working in their Directorate.

Concretely this means that a separate gifts register has been set up on the t: drive for each Directorate. Access to the drive is limited to the Director, his/her secretary and the Directorate ACA. Attached in annex is a list of those people to whom access will be granted. Should you notice that there is a mistake in this list, please contact Morag Baker (tel: 90379) from unit A1 who will act as coordinator for access requests to the registry.

The workflow is as follows:

- (1) A request for authorization to keep a gift must be made for all gifts with a value greater than, or equal to €50 using the form which can be downloaded from the intranet at : <http://www.trade.cec.eu.int/intra/staff/ethics/forms.cfm>
- (2) It is not necessary to inform unit A1 about gifts with a value of less than €50, although it is strongly recommended that you always inform your line manager via e-mail. Instead, staff are themselves responsible for keeping a record of low value gifts received and should request authorization to keep a gift once the cumulative value of gifts received from the same source exceeds €50.
- (3) The completed form should then be submitted for review to the responsible Head of Unit who should carry out a substantive review, carefully considering the motivation to keep the gift and whether acceptance of the gift could in any way cause, or be perceived to cause, a conflict of interest.

- (4) A technical review of the request should then be carried out by the ACA to ensure that the request form has been correctly completed and approved by the head of unit, before submitting it to the Director for formal approval or refusal.
- (5) All gifts received should be recorded in the registry by the Directorate secretary (including those with a value greater than €250) and a scanned version of the gift authorization form should be attached to the relevant entry in the register via hyperlink.

The main change to the current procedure is that approval (or refusal) to keep a gift now takes place at the Directorate level. From now on A1 will only review random samples of entries in the gifts register to ensure that procedures are being correctly applied as part of its role as the unit responsible for monitoring the application of internal controls within the DG.

The quick guide on gifts and hospitality has been recently updated to bring it into line with the provisions set out in the DG TRADE code on ethics and integrity and can be consulted at: <http://www.trade.cec.eu.int/intra/staff/ethics/index.cfm?lang=en>

This procedure is to be implemented from now on. Should you have any questions in relation to the above please do not hesitate to contact Caroline de Graef or Morag Baker.

(signed)  
David O'Sullivan

Cc: Julian King – CAB ASHTON, Donatienne Claeys-Bouuaert – SG, Giuseppe Casella,  
Marilena SEMERARO - DG ADMIN,