

CLAEYS BOUUAERT Donatienne (SG)

From: Barbara.Dilschneider@CliffordChance.com on behalf of Michel.Petite@CliffordChance.com
Sent: lundi 28 juin 2010 16:22
To: SZLASZEWSKI Hubert (SG); CLAEYS BOUUAERT Donatienne (SG)
Cc: terry.wynn@talk21.com; rgvaldecasas@gmail.com; Michel.Petite@CliffordChance.com
Subject: Mr Gunter Verheugen
Attachments: PARIS-1-1069787-v6-Avis du Comité ad hoc dEthique - Request 7.DOC

Dear All,

Please find attached the opinion of the Ethics Committee regarding Mr Gunter Verheugen's request to the Commission.

Best regards

Michel Petite
Of Counsel
Clifford Chance LLP
9 place Vendôme, CS 50018, 75038 Paris Cedex 01
Direct dial: +33 (0)1 44 05 52 44
michel.petite@cliffordchance.com

This message and any attachment are confidential and may be privileged or otherwise. If you are not the intended recipient, please telephone or email the sender and delete the attachment from your system. If you are not the intended recipient you must not disclose the contents to any other person.

Clifford Chance as a global firm regularly shares client and/or matter-related data with its offices and support entities in strict compliance with internal control policies. Incoming and outgoing email communications may be monitored by Clifford Chance, a law firm, in accordance with applicable law and regulations.

For further information about Clifford Chance please see our website at <http://www.cliffordchance.com> or contact any Clifford Chance office.

Switchboard: +33 1 44 05 52 52
Fax: +33 1 44 05 52 00

To contact any other office <http://www.cliffordchance.com/directory/offices/?Lang>

[CC]Office1[/CC]

Ad Hoc Ethical Committee

TO		DATE	28 June 2010
COPY TO		FILE REF	
FROM	Michel Petite Rafael Garcia-Valdecasas Terry Wynn	DIRECT DIAL	+33 1 44 05 52 44

Re:

- **Request n° 7 from the European Commission**
- **Mr Gunter Verheugen**

1. By letter of 7 May 2010, the Secretary General of the European Commission sent a request for an opinion from the Ad hoc Ethical Committee on envisaged post-office occupations of Mr Gunter Verheugen.

On the 1 June the Committee asked for further information on the request, to which a reply was given on 8 June after contacting Mr Verheugen.

2. The activities proposed are:
 - i. Member of the International Advisory Board of Fleishman Hillard International Communications, a US private company doing business in Public Relations and Publicity. The role of this International Advisory Board is strictly advisory and excludes lobbying of any kind. The IAB is not a formal body or organ of the company and does not hold separate meetings. Members are expected to deliver speeches, attend seminars and conferences organised by the company.
 - ii. Role of adviser to the President of TOBB (Union of Chambers and Commodity Exchanges of Turkey), to advise on international and bilateral Turkish/German business relations. The role is to meet with the President to give advise, not to sit on any organs of the company. Attending International events and giving speeches will be part of the role.

iii. Senior Adviser/Vice Chairman of Royal Bank of Scotland (German Branch). A strictly advisory role with no executive functions or lobbying. The VC title is purely decorative and the position does not demand sitting on organs of RBS.

iv. Political Adviser to Bundersverband der Deutschen Volksbanken und Raiffeisenbanken (BVR- Federation of Co-operative Banks). BVR is not a bank but the political representation of 1200 local Co-operative banks in Germany and the role will not include any lobbying. Once again the position does not involve sitting on organs of BVR but giving advice and speeches.

3. Considering the various roles do not conflict with the Code of Conduct of former Commissioners, the Ethical Committee is of the opinion that the considered activities are in conformity with article 245 (2) of the Treaty on the Functioning of the Union.