# ADVISORY COMMITTEE ON THE CONDUCT OF MEMBERS

# 2025 ANNUAL REPORT

## FOREWORD

In accordance with Article 10(7) of the Code of Conduct for Members of the European Parliament regarding integrity and transparency (Annex I to Parliament's Rules of Procedure, hereinafter 'the Code of Conduct'), the Advisory Committee on the Conduct of Members (hereinafter 'the Advisory Committee') publishes an annual report on its work.

The Annual Report on the work of the Advisory Committee from 1 January to 31 December 2025 was adopted by the Committee on 13 April 2026.

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This report covers the activities of the Advisory Committee in the period from 1 January to 31 December 2025.

In 2025, the Advisory Committee examined 17 cases of alleged breaches of the Code of Conduct (compared to 11 cases in 2024). The increasing trend can be explained by the fact that, according to the rules revised in 2023, alleged breaches of the Code of Conduct can also be signalled directly to the Advisory Committee. The change led to an increased level of awareness of the integrity and transparency rules both inside and outside the European Parliament.

The Advisory Committee received two requests from Members seeking its guidance on the interpretation and implementation of the provisions of the Code of Conduct. The Advisory Committee provided its counsel in confidence and within the deadline foreseen by the Code of Conduct.

In accordance with the Implementing Measures for the Code of Conduct regarding integrity and transparency, adopted by the Bureau on 16 October 2023, the competent administrative service (the Members' Administration Unit within DG Presidency, which provides secretariat services for the Advisory Committee) continued performing general plausibility checks on the declarations of private interests submitted by Members.

Following a longstanding practice, the Members' Administration Unit continued responding to inquiries put forward by Members or their assistants, with a view to helping them correctly apply the provisions of the Code and its Implementing Measures.

Between 1 January and 31 December 2025, 193 declarations of private interests (of which 187 were updates), 6805 declarations on awareness of conflicts of interest, 212 declarations of attendance at events organised by third parties and 11 declarations of assets were submitted in accordance with the rules. In addition, Members notified the President of 44 gifts. A total number of 32.122 meetings with interest or third country representatives were published.

Compared to 2024, the increased number of declarations submitted demonstrates a high level of awareness of the new obligations among Members and increased transparency within the European Parliament.

As a new element, trend analysis graphs have been inserted at the end of the report, allowing for an overview and assessment of the workload and data.

## 1. OBLIGATIONS OF MEMBERS REGARDING INTEGRITY AND TRANSPARENCY

The Code of Conduct sets out the guiding principles regarding integrity and transparency and the main duties of Members in the exercise of their mandate. Members are guided by and observe the general principles of conduct of disinterest, integrity, openness, diligence, honesty, accountability, and respect for Parliament's dignity and reputation. They must act solely in the public interest and refrain from obtaining or seeking to obtain any direct or indirect benefit or other reward.

Pursuant to Article 2 of the Code of Conduct, Members shall not enter into any agreement to act or vote in the interest of any other legal or natural person that would compromise their freedom of vote. They must not solicit, accept or receive any direct or indirect benefit or other reward, including in cash or in kind, in exchange for specific behaviour in the scope of the Member's parliamentary work, and must consciously seek to avoid any situation which might imply bribery, corruption, or undue influence. In addition, Members may not engage in paid lobbying activities directly linked to the Union decision-making process.

The Code of Conduct provides the definition of "conflicts of interest" and establishes the necessary steps to address any such conflict. A conflict of interest exists where the exercise of the mandate of a Member of the European Parliament in the public interest may be improperly influenced for reasons involving his or her family, emotional life or economic interest, or any other direct or indirect private interest. The definition of "conflicts of interest" of the Code of Conduct must be interpreted so as to cover not only a private interest which actually influences the Member in the performance of his or her duties, but also 'a situation in which the interest identified may, in the eyes of the public, appear to influence the impartial and objective performance' of the Member's duties[1]. A conflict of interest does not exist where a Member benefits only as a member of the general public or of a broad class of persons.

Members have the obligation to make every reasonable effort to detect conflicts of interest, and, when becoming aware of any, immediately endeavour to resolve them. If unable to resolve the conflict of interest, Members need to declare it in their declaration of private interests. They

[1] Judgment of 15 July 2015, Dennekamp v Parliament, T-115/13, EU:T:2015:497, paragraph 106.

must also disclose, before speaking or voting in plenary or in one of the European Parliament's bodies, any conflict of interest in relation to the matter under consideration.

In addition, office holders, rapporteurs, shadow rapporteurs, including for opinion, and participants in an official delegation or in interinstitutional negotiations are also required to submit a declaration on awareness of conflicts of interest. On 17 June 2025, Parliament adopted an interpretation on this point, establishing that a Member who is proposed as rapporteur for several files with a similar subject matter may submit one general declaration covering all those files. If a conflict of interest were to arise for an individual file, a declaration must be submitted for that individual file. In the case of reports on the verification of credentials of newly elected Members, the rapporteur must declare a conflict of interest in relation to the verification of his or her own credentials.

Furthermore, the Code of Conduct establishes detailed rules regarding the declaration of private interests. Members must submit a declaration containing all the required information in a detailed and precise manner. The initial declaration is due by the end of the first plenary session after the European elections, or within 30 days of taking up office as a Member during the course of the parliamentary term. If any change occurs, a revised declaration must be submitted by the end of the following month.

Article 5 of the Code of Conduct contains the Members' obligation to submit a declaration of assets at the beginning and at the end of their mandate.

In the performance of their duties, Members of the European Parliament are required to refrain from accepting any gifts or similar benefits, other than those with an approximate value of less than EUR 150. In case gifts with an approximate value greater than EUR 150 are presented to Members when they are representing the European Parliament in an official capacity, the Members must notify the President and hand over the gifts to the institution.

Members are required to declare their attendance at events organised by individuals or organisations if their travel, accommodation and/or subsistence expenses were paid or reimbursed by third parties, in full or in part.

The Code of Conduct requires all Members to publish online all scheduled meetings relating to parliamentary business with interest representatives falling within the scope of the Interinstitutional Agreement on a mandatory transparency register, and with representatives of public authorities of third countries, including their diplomatic missions and embassies.

Article 8 concerns the declaration of input. Following a modification of Article 8 adopted by Parliament on 17 June 2025, aligning Articles 7 and 8, the rapporteurs must list, in an annex to their report or opinion, the interest representatives, and the representatives of public authorities of third countries, including their diplomatic missions and embassies, from whom they received input on matters pertaining to the subject of the file and which the rapporteurs included in their report or opinion. At the same time as the modification of the Article, Parliament adopted an interpretation concerning declarations of input in the context of procedures relating to the immunity of a Member; for reports in the context of immunities, the declaration of input does not apply.

Apart from the declarations of assets, all declarations and the register of official gifts are directly accessible on the Parliament's public website.

The above-mentioned disclosure obligations reflect the European Parliament's strong commitment to transparency and ethics. Moreover, the Code of Conduct provides for a mechanism of monitoring and enforcement for its provisions.

## 2. THE ADVISORY COMMITTEE ON THE CONDUCT OF MEMBERS

According to Article 10 of the Code of Conduct, the Advisory Committee is composed of eight Members of the European Parliament. The committee assesses alleged breaches of the Code of Conduct and advises the President on possible action to be taken, not only upon request of the President but also when directly signalled to it. The Advisory Committee also proactively monitors Members' compliance with the Code of Conduct and its Implementing Measures, and signals to the President any possible breaches.

### 2.1 Composition

The Advisory Committee is appointed by the President, at the beginning of his or her term, taking due account of the Members' experience and of political and gender balance.

In 2025, the eight permanent Members of the Advisory Committee were:

- Ms Monika HOHLMEIER (EPP, Germany);
- Ms Ana Catarina MENDES (S&D, Portugal);
- Mr Gerolf ANNEMANS (PfE, Belgium);
- Ms Chiara GEMMA (ECR, Italy);
- Mr Gilles BOYER (Renew, France);
- Mr Nicolae STEFĂNUȚĂ (Greens/EFA, Romania);
- Mr Martin SCHIRDEWAN (The Left, Germany);
- Mr Antonio LÓPEZ-ISTÚRIZ WHITE (EPP, Spain).

At the beginning of his or her term of office, the President must also appoint reserve Members for the Advisory Committee, one for each political group not represented in the Advisory Committee. The reserve Member appointed by the President for the first half of the 10th legislative term is:

- Mr Ivan DAVID (ESN, Czechia).

### 2.2 Chair-in-office

In accordance with the second subparagraph of Article 10(2) of the Code of Conduct, each permanent Member of the Advisory Committee serves as Chair for six months on a rotating basis. Article 4 of the Advisory Committee's Rules of Procedure further specifies that, in principle, rotation follows the numerical strength of the political groups represented in the Advisory Committee.

In 2025, Ms Monika HOHLMEIER (January-March 2025), Ms Ana Catarina MENDES (April-September 2025) and Ms Chiara GEMMA (October-December 2025) served as Chairs. Ms GEMMA's mandate as Chair runs until the end of March 2026.

### 2.3 Meetings in 2025

The calendar of meetings of the Advisory Committee for the year 2025 was adopted on 1 October 2024 and the Advisory Committee subsequently met on 10 occasions, as follows:

**Calendar of meetings in 2025**

- Tuesday 28 January
- Tuesday 18 March
- Tuesday 8 April
- Tuesday 22 April (Extraordinary Meeting)
- Tuesday 6 May (Extraordinary Meeting)
- Tuesday 8 July
- Tuesday 23 September
- Tuesday 14 October
- Tuesday 11 November
- Tuesday 16 December

## 2.4 Cases examined and guidance provided

### 2.4.1 Referral by the President of alleged breaches of the Code of Conduct

Where there is reason to believe that a Member may have breached the Code of Conduct, the President shall refer the matter to the Advisory Committee (Article 11 of the Code of Conduct). The Advisory Committee then examines the circumstances of the alleged breach and may hear the Member concerned. The Advisory Committee makes a recommendation to the President on a possible decision. The Advisory Committee can include a recommendation of a penalty, where appropriate.

In 2025, the President referred to the Advisory Committee one case of an alleged breach of the Code of Conduct. Another case, originally referred at the end of 2024, was examined and completed by the Advisory Committee in 2025.

- **Alleged breach of one of the main duties of Members and of the disclosure obligations in the declaration of private interests**

The first referral by the President, examined by the Advisory Committee in 2025, concerned a possible breach of the obligation under Article 2(b) of the Code of Conduct to avoid any situation which might imply bribery, corruption or undue influence. In addition to the referral, the Advisory Committee received several citizen complaints about a lack of detail and precision in the declaration of private interests submitted by the concerned Member which could mean an alleged breach of Article 4(2) of the Code of Conduct.

The Advisory Committee examined all the information publicly available and, after hearing the Member concerned, concluded that, with the available information, no breach of Article 2(b) could be established. However, a breach of the Article 4(2) of the Code of Conduct concerning the declaration of private interests was established. Following the recommendations of the Advisory Committee, the President decided to impose a penalty consisting of a forfeiture of entitlement to the daily subsistence allowance for a period of 2 days on the Member in accordance with Parliament's Rules of Procedure. Consequently, the Member updated the declaration of private interests.

- **Alleged breach of the disclosure obligations concerning invitations to events organised by third parties**

The second referral examined by the Advisory Committee in 2025 concerned a possible breach of the disclosure obligations related to attendance by a Member at events organised by a third party. The participation in the event was also identified via media monitoring prior to the referral from the President.

Pursuant to Article 6(3) of the Code of Conduct and Article 10 of its Implementing Measures, Members must declare their attendance, in the performance of their duties, at events organised by a third party, where the travel, accommodation or subsistence expenses were fully or partially paid or reimbursed by a third party. The Member did not submit any declaration to that effect within the 60-day deadline imposed by the rules.

The Advisory Committee contacted the concerned Member asking for clarification. In their reply, the Member stated that all expenses were covered with personal funds and that participation in the event was not in their capacity as Member of the European Parliament.

Throughout its examination, the Advisory Committee relies exclusively on the information provided by the Member, on inter-services exchange of information and sources available to the public. On that basis, the Advisory Committee concluded that no breach of the disclosure obligations set out in the Code of Conduct could be established in this case.

### 2.4.2 Alleged breaches of the Code of Conduct signalled directly to the Advisory Committee

Pursuant to Article 10 of the Code of Conduct, alleged breaches can be signalled directly to the Advisory Committee, which must assess them and advise the President on possible action to be taken. In 2025, eleven cases of alleged breaches of the Code of Conduct were examined by the Advisory Committee, as detailed below.

Two cases were related to alleged conflicts of interest. The first case mainly concerned an allegation of engagement in paid lobbying activities and conflict of interest in connection with external activities, while the second case, which was under assessment at the moment of

writing, contained various allegations of a conflict of interest, as well as the breach of the main duties of Members and other disclosure obligations (see cases no. 1-2 below). Six cases were related to alleged breaches of the disclosure obligations in connection with the declaration of private interests (see cases no. 3-8). Another two cases concerned alleged breaches of the disclosure obligations on the publication of meetings (see cases no. 9-10). The last case of direct signalling concerned an alleged breach of the disclosure obligations on the attendance at events organised by third parties (see case no. 11). The direct signalling in these cases had been done by private citizens, civil society organisations, Members of the European Parliament and journalists.

- **Paid lobbying activities and conflicts of interest**

The **first case** of direct signalling was examined by the Advisory Committee following a complaint concerning the external activities undertaken by a Member of the European Parliament, with an alleged breach of the obligation under Article 2(c) of the Code of Conduct, and a possible conflict of interest under Article 3.

In particular, the complainant signalled that the side activities of the Member concerned might not comply with the rules prohibiting the engagement of Members in paid lobbying activities directly linked to the Union decision-making process. The Member had duly declared in their declaration of private interests the paid side activities in question and the remuneration received.

The Code of Conduct does not prohibit Members from holding remunerated or unremunerated side activities. As the mandate in the European Parliament is of limited duration, Members cannot be asked to give up their professional or other side activities during the mandate. However, the Code of Conduct lays down certain limits to Members' side activities (Article 2) as well as rules on conflicts of interest (Article 3) and disclosure obligations (Article 4).

The Advisory Committee had the task of assessing what type of activity can be considered prohibited paid lobbying according to the Code of Conduct, independently of the fact that the position is duly declared in good faith in accordance with Article 4 of the Code of Conduct. The Advisory Committee held an information exchange with the Member.

On the allegation of breaching Article 2(c) of the Code of Conduct on paid lobbying activities, the Advisory Committee was not able to reach an agreement on a definitive assessment of the situation. There were two diverging sets of views on the matter.

On the one hand, it was argued that the change in Article 2(c) of the Code of Conduct was intentional and created a new rule to be applied. The Member was engaged in the regional decision-making bodies of an interest organisation, and an income was received to compensate for the time used in this engagement. The purpose of the organisation in question was to influence also EU legislation. Regional activities should not be excluded from the application of the rule, as it would provide a loophole allowing the engagement of Members in paid activities at subsidiary level, thus still contributing to the overall lobbying.

On the other hand, it was argued that the new rules need to be applied restrictively in view of the Members' freedom to carry outside activities. The compensation received by the Member constituted, rather, a reimbursement of expenses. It was questioned whether regional activities could be considered as lobbying directly at the EU level, as the main purpose is on implementation of EU law at regional level. Considering regional level activities as paid lobbying directly linked to the EU decision-making process would discourage Members from engagement in associations at the regional and local level. The fact that the activities and the remuneration were duly declared also demonstrated a high degree of transparency.

Regarding the conflict of interest, the Advisory Committee did not consider that a general conflict of interest existed as such in the given context. However, if the Member were to be proposed as rapporteur or shadow rapporteur for a file which were to have a connection to the side activities of the Member, the rules on conflicts of interest would have to be carefully observed and the Member should declare any potential situation in their declarations on awareness of conflicts of interest. In this sense, the Advisory Committee concluded that the Member should carefully observe the rules and obligations laid down in the Code of Conduct, in particular concerning conflicts of interest as enshrined in Article 3.

In the **second case,** according to the complainants, a Member who was appointed as rapporteur was allegedly in a situation of conflict of interest and did not fulfil the obligation to declare it in the declaration on awareness of conflicts of interest submitted prior to assuming that role of rapporteur. Furthermore, the complainants questioned the completeness of the declaration

of private interests of the Member and referred to a possible breach of the meetings and input disclosure obligations (Articles 7 and 8 of the Code of Conduct) by the same Member. The assessment of this case will be finalised in 2026.

- **Declarations of Private Interests**

The **third case** concerned the monetisation of social media activities by a Member of the European Parliament which was not reflected in the Member's declaration of private interests. The Advisory Committee requested clarification from the Member as to why such activities were not included in their declaration of private interests. The Member replied in writing that no income was generated from social media content linked to parliamentary activities, but rather from their previous activity as an influencer. The Member also asked the Advisory Committee for guidance on how to better comply with the disclosure obligations through the declaration of private interests.

The Advisory Committee suggested that the Member update their declaration of private interests to include all activities linked to social media, including sponsorships, if the total remuneration exceeded EUR 5 000 gross in a calendar year, as well as any other relevant information. The Advisory Committee explained that activities on media channels owned by third parties and where any resulting income goes solely to those third parties do not fall under the scope of the Code of Conduct. The Advisory Committee strongly advised the Member to keep any monetisation of content linked to their parliamentary work disabled.

Finally, if the Member were to be proposed as rapporteur or shadow rapporteur on files related to the activities of companies advertised through the influencer activity, the Advisory Committee recommended that they declare the situation in the relevant declaration on awareness of conflicts of interest. After having noted that the Member updated the declaration of private interests as recommended, the Advisory Committee decided to consider the case closed.

The **fourth case** was triggered by a complaint received by the Advisory Committee in 2025 relating to a promotional video published by a Member on social media with the objective of promoting a company. The Advisory Committee assessed whether the Members' participation in a commercial advertisement could be perceived as a conflict of interest and, therefore, as a

breach of Article 3 of the Code of Conduct. It also examined whether financial or any other type of support was received by the Member from the company, as this might potentially have resulted in a violation of the disclosure obligations of private interests of Members in accordance with Article 4 of the Code of Conduct. The Advisory Committee sent a written request for clarification to the Member. The Member provided an answer indicating that no financial or other type of support was received in exchange for the promotional video posted on social media channels. Taking into account the reply received from the Member and the publicly available information on the case, no breach of the Code of Conduct was established.

The **fifth case** concerned a complaint with regard to a Member's membership of the board of a third-country political party and their active participation in the activities of that party. Those activities were allegedly not declared in the Member's declaration of private interests. The first question examined by the Advisory Committee in this case concerned the compatibility with the Code of Conduct of side activities of a Member within a political party of a third country. The Advisory Committee found that there are no limitations to such outside activities in the Code of Conduct, and that sitting Members of the European Parliament can hold office, make financial contributions and participate in activities of political parties from third countries. With regard to the disclosure obligations, the Advisory Committee sent to the Member a request for clarification on current and past activities and memberships.

The Member spontaneously updated their declaration of private interests and sent a written reply to the committee's request for clarification. The Advisory Committee decided that no breach of the Code of Conduct could be established.

The **sixth case** was related to alleged discrepancies between the information in the declaration of private interests of a Member and the national declaration submitted annually in their Member State. The Advisory Committee noted that the scope of the national declaration was dissimilar, and wider than the declaration of private interests required by the Code of Conduct. After an initial analysis of the contents, the Advisory Committee sent a request for clarification to the concerned Member, enquiring about the nature and characteristics of current and past activities.

Following the recommendation of the Advisory Committee, the Member updated their declaration of private interests in line with the requirements set out in the Code of Conduct.

The **seventh case** concerned alleged discrepancies between the information contained in the official accounting records of companies in the Member State and the declaration of private interests of the Member.

While the Advisory Committee has no mandate to verify or validate any national records, it decided to send a letter to the Member with the recommendation to verify the disclosure obligations of the Code of Conduct. The mandate of the Member ended shortly after the decision of the Advisory Committee. Therefore, the case was closed owing to the end of mandate.

The **eighth case** was assessed following allegations of a Member's possible engagement in paid lobbying activities on behalf of the government of a third country, and various other alleged breaches of the disclosure obligations.

The Advisory Committee examined the content and the sources of the complaint, and the activities declared by the Member, without finding any information on the alleged lobbying activities or of other breaches of disclosure obligations. In accordance with Rule 12 of the Rules of Procedure of the Advisory Committee, the Committee considered the complaint to be manifestly unfounded and closed the case.

- **Publication of meetings**

The **ninth case** was focused on an alleged breach by at least two Members of Article 7(1) of the Code of Conduct, in conjunction with Article 5 of the Interinstitutional Agreement on a mandatory transparency register (IIA). The case concerned meetings held within the premises of the European Parliament with an interest representative not registered in the Transparency Register.

The Advisory Committee noted that the IIA imposes obligations on the Institutions that are signatories of the IIA, and not on individual Members. Article 5 of the IIA introduces the principle of conditionality. This means that all the signatory institutions commit to make registration in the EU Transparency Register a necessary precondition for interest representatives who wish to have certain interactions with members or staff. Nevertheless, each

institution may decide which activities require interest representatives to be registered, and in which activities interest representatives may participate even if they are not registered. The European Parliament internally implemented Article 5 of the IIA through the Bureau decision of 12 June 2023, which regulates in detail the participation of interest representatives in events held on Parliament's premises.

Article 7(1) of the Code of Conduct provides that "Members should only meet interest representatives that are entered in the transparency register established by means of the Interinstitutional Agreement on a mandatory transparency register". The use of the term "should" indicates a strong recommendation, contrasting with other articles of the Code of Conduct where the term "shall" is used to create a binding obligation.

Therefore, Article 7(1) of the Code of Conduct cannot be read as creating a binding obligation for Members to meet only with interest representatives registered in the Transparency Register, as that could be contrary to the principle of freedom of mandate. Members have an obligation to declare scheduled meetings related to parliamentary business with interest representatives falling within the scope of the Transparency Register, irrespective of whether they are registered or not. No mandatory deadline for publishing a meeting is established by Article 7(2) of the Code of Conduct.

Considering the applicable legal framework, according to which Members cannot be prevented from meeting with organisations or individuals which are not registered in the Transparency Register, the Advisory Committee concluded that no violation of Article 7(1) could be established.

The **tenth case** concerned a complaint referring to the lack of precision of the disclosure obligations on the publication of meetings by a Member (Article 7 of the Code of Conduct). During its examination, the Advisory Committee noted that the Member was publishing meetings and thus respecting the disclosure obligations. However, the Advisory Committee sent a letter to the Member on the declaration of meetings, and more specifically, on the importance of making clear which parliamentary files were discussed at each meeting, if applicable.

Consequently, the Member amended the previously published entries for various meetings and followed the recommendations for those meetings held after the receipt of the letter.

- **Attendance at events organised by a third party**

In the **eleventh case,** it was signalled that a Member participated in an event organised by a third party. The Advisory Committee noted that no declaration had been submitted within the deadline prescribed by the Code of Conduct, and decided to contact the Member to ask for clarification. The assessment of this case was ongoing at the end of 2025 and will be finalised in 2026.

### 2.4.3 Cases identified via compliance monitoring

Pursuant to Article 10(5), third subparagraph, of the Code of Conduct, and in accordance with Rule 9 of the Rules of Procedure of the Advisory Committee, the Advisory Committee has the task of proactively monitoring compliance by Members with the Code of Conduct and its Implementing Measures. It may signal to the President any possible breaches of those provisions.

According to Rule 9 of the Advisory Committee's Rules of Procedure, the secretariat, on behalf of the Advisory Committee, based on inter-service exchange of information and sources available to the public, performs regular checks on Members' compliance with the Code of Conduct and its Implementing Measures, as well as random checks, and prepares, ahead of each meeting of the Advisory Committee, a list of any cases that might merit further consideration.

The Advisory Committee requested the secretariat to provide a full overview of all the allegations made concerning Members. On this basis, in 2025, the secretariat prepared a list of 28 cases either identified through monitoring (13 cases) or submitted by third parties (15 cases), out of which four cases merited further consideration by the Advisory Committee. The other cases were either out of the scope of the Code of Conduct, were no longer relevant by the time of examination, or were also signalled directly to the Advisory Committee.

The four cases identified through monitoring and subsequently examined by the Advisory Committee concerned the participation of Members in events organised by third parties. In all four cases, the Members had not submitted a declaration of attendance within the 60-day deadline laid down in the Implementing Measures. In all four cases, the Members were contacted by the Advisory Committee. The Members confirmed that no financial or other support had been received in connection with the participation in the respective event and that the participation had been in personal capacity or as representatives of their national political parties, and not in their capacity as Members of the European Parliament.

On two occasions, the Advisory Committee reminded the Members to declare any meetings with representatives of third countries in accordance with Article 7 of the Code of Conduct, if applicable to their situation. Since the Advisory Committee relies on the information provided by the Members and no contradictory information from available sources was presented, it decided that no further action was necessary.

### 2.4.4 Request for guidance from Members on the interpretation and implementation of the Code of Conduct

According to Article 10(5) of the Code of Conduct, any Member may request guidance from the Advisory Committee on the interpretation and implementation of the provisions of the code, and is entitled to rely on such guidance. The Advisory Committee provides guidance in confidence and within 30 calendar days. In 2025, the Advisory Committee received two requests for guidance from Members.

- **Guidance on a possible conflict of interest arising from being a minority shareholder in a company**

The first request concerned the interpretation and implementation of the provisions of the Code of Conduct regarding the declaration on awareness of conflicts of interest. The Member requested guidance on the applicable disclosure obligations prior to being nominated as rapporteur for a non-legislative file with a broad scope, taking into account the current activities, memberships and holdings declared in their declaration of private interests. The Advisory Committee recommended that the Member should declare in their declaration on

awareness of conflicts of interest that the situation could lead to a conflict of interest and should describe the situation in the free text section of the form in accordance with Article 3(5) of the Code of Conduct.

The Member followed the recommendation of the Advisory Committee and submitted their declaration on awareness of conflicts of interest accordingly. The competent committee later followed the procedure foreseen in Article 3(5) and decided that the Member could continue their activity, on the ground that the potential conflict of interest did not prevent the Member from exercising their mandate in the public interest.

- **Guidance on possible conflicts of interest and professional activities**

The second request contained questions from a Member concerning potential conflicts of interest in the context of current activities, memberships, holdings, as well as other private interests alongside the exercise of the office of Member. In the guidance provided, the Advisory Committee explained that conflicts of interest should be assessed considering the concrete situation, in view of the actual work carried out as Member of the European Parliament in the public interest.

Since the circumstances presented appeared *prima facie* not to be incompatible with the provisions of the Code of Conduct, the Member received the recommendation to update the declaration of private interests in order to describe the situation in a detailed and precise manner. The Member was also reminded to evaluate, on a case-by-case basis, how to complete the declarations on awareness of conflicts of interest if the Member were to be proposed in the future as rapporteur or shadow rapporteur for a file related to the private interests concerned.

Throughout the year, the secretariat continued, following its well-established practice, responding to inquiries submitted by Members and their parliamentary assistants on how to interpret and correctly apply the provisions of the Code of Conduct and its Implementing Measures, while reducing, as far as possible, their administrative burden. The advice provided at the secretariat level generally serves as preliminary guidance. Members were reminded that they could submit a request for formal guidance on the same topic to the Advisory Committee.

## 3. ACTIVITIES LINKED TO THE CODE OF CONDUCT

### 3.1 Submission and updating of Members' Declarations of Private Interests

Pursuant to Article 4 of the Code of Conduct, Members must submit a detailed and precise declaration of private interests by the end of the first part-session following elections to the European Parliament, or within 30 days of taking up office during a parliamentary term. They must notify the President of any changes that have an influence on their declaration by the end of the month following each change occurring.

A total of 193 declarations of private interests were submitted in 2025, of which 6 declarations were submitted following the start of a new mandate and 187 declarations were updates. Compared to the same period of the 9$^{th}$ legislature, it represents a significant increase in updates to the declaration of private interests.

### 3.2 Submission of other declarations

- Declaration on Awareness of Conflicts of Interest

Members who take up certain offices (Vice-President, Quaestor, Chair or Vice-Chair of a committee or delegation) or functions (rapporteur, shadow rapporteur or participant in an official delegation or in interinstitutional negotiations) must declare whether they are aware of any conflict of interest in relation to the responsibilities of the office, report, opinion, delegation or negotiations in question. In cases of awareness of conflicts of interest, the Code of Conduct establishes a specific procedure.

From January to December 2025, 6805 declarations were made, showing a high degree of compliance. As predicted in the previous annual report, when the committees started working more intensively on legislative proposals, the number of these declarations increased significantly.

- Declaration of Assets

The declaration of assets must be submitted at the beginning and at the end of each mandate. The declaration covers assets (immovable property, financial instruments, and non-EU bank accounts), and liabilities such as loans. These declarations are not to be published and would only be provided to judicial authorities in the context of legal proceedings.

The majority of declarations of assets were submitted during the previous year, due to the start of the new mandate. In 2025, 11 declarations of assets were submitted by both outgoing and incoming Members.

- Declaration of Input

This declaration of input is an annex to a report or opinion at committee level, indicating from which persons or organisations (if any) the rapporteur has received input during the preparation of his or her position. Reports without a declaration of input cannot be tabled for plenary. All committee reports voted in plenary from January until December 2025, excepting those in immunity cases to which the declaration of input does not apply, have thus complied with the requirement.

- Gifts

According to the provisions of the Code of Conduct, gifts with a value of less than EUR 150 do not need to be declared. From the beginning of 2025 until the end of the year, 44 gifts were declared and published in the gifts register.

- Declaration of attendance at events organised by third parties

A declaration of attendance at events organised by third parties is required where Members' travel, accommodation or subsistence expenses have been paid or reimbursed in full or in part by a third party. In 2025, 212 declarations were submitted.

- Publication of meetings

Members must publish online all scheduled meetings relating to parliamentary business with interest representatives falling within the scope of the Transparency Register or with representatives of public authorities of third countries, including their diplomatic missions and embassies. A total of 32 122 meetings were declared for 2025.

### 3.3 Awareness raising

Article 10(7) of the Code of Conduct contains a specific mandate for the Advisory Committee to raise Members' awareness of the Code of Conduct and its Implementing Measures on a regular basis. Rule 7 of the Rules of Procedure of the Advisory Committee further specifies that the Advisory Committee raises Members' awareness of the Code of Conduct and its Implementing Measures on a regular basis by carrying out an information campaign aimed at all Members on their obligations at least once per year.

In addition, Article 15 of the Implementing Measures establishes that the competent service (Members' Administration Unit) must assist the responsible bodies in raising Members' awareness on these measures at regular intervals throughout the parliamentary term and must provide tailor-made training for Members, which is available on request at any time during the parliamentary term.

To support Members in complying with the Code of Conduct, in 2025, the Members' Administration Unit organised four tailor-made individual training courses at the request of Members, one information session for parliamentary assistants and three tailor made training courses for political group staff.

The Members' Administration Unit also participated in 13 training sessions on good office management for Members, organised by DG PERS, and in mandatory training for parliamentary assistants to raise awareness on the content of the Code of Conduct and the role of the Advisory Committee.

In addition, personal assistance was provided to Members and their offices throughout the year, helping them to successfully comply with the various obligations. On average, the Members' Administration Unit receives around 10-12 requests of assistance per working day on matters related to the Code of Conduct, either by phone or by e-mail.

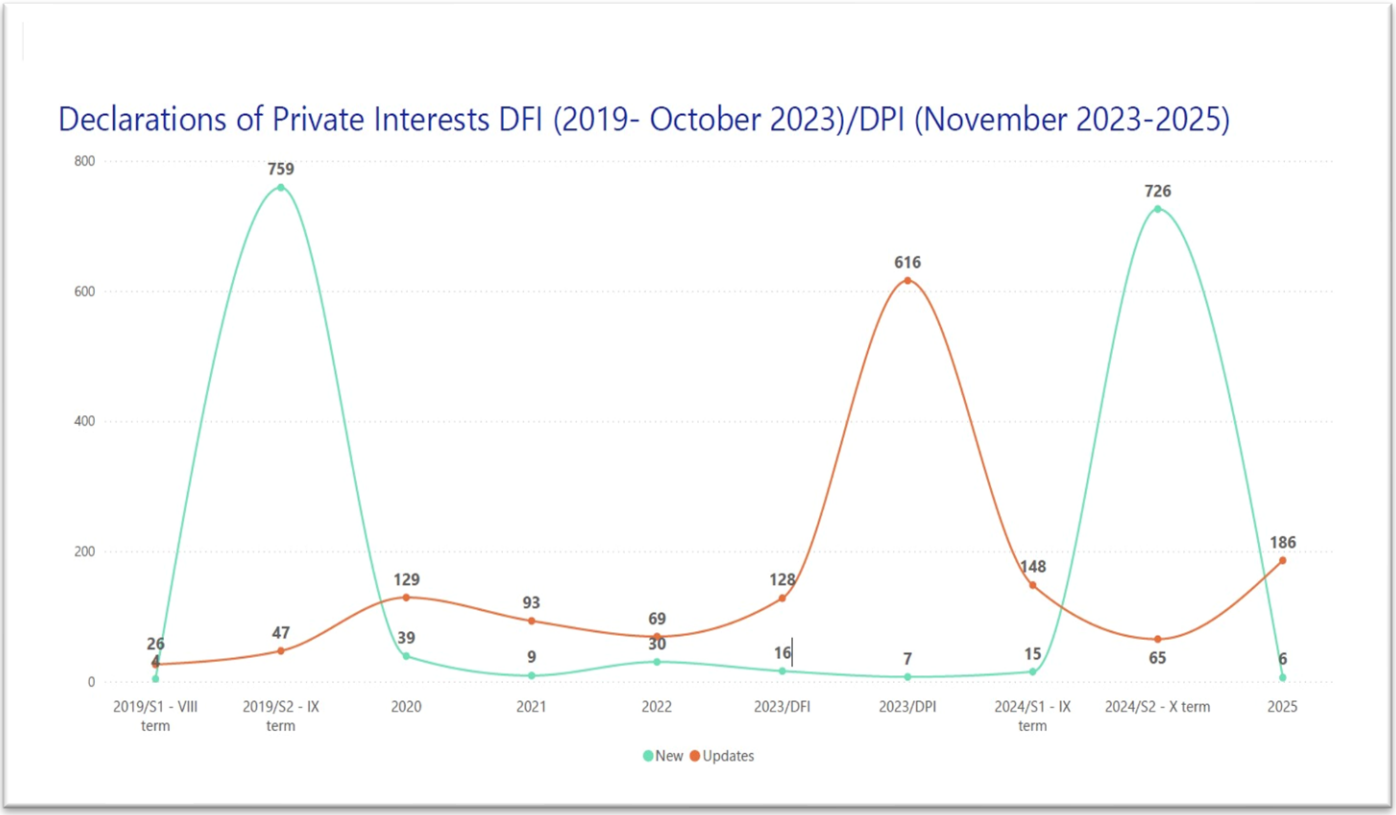
### 3.4 STATISTICS

| | | 2024 1st half | 2024 2nd half * | 2025 1st half | 2025 2nd half |
|---|---|---|---|---|---|
| **Declarations of Private Interests** | **New Members** | 102 | 726 | 1 | 5 |
| | **Updates** | 61 | 65 | 99 | 87 |
| | **Total** | 163 | 791 | 100 | 93 |
| **Declarations of Attendance at events organised by third parties** | | 64 | 76 | 109 | 103 |
| **Notifications of Gifts** | | 9 | 12 | 26 | 18 |
| **Declarations on Awareness of Conflicts of Interest** | | 575 | 1418 | 3827 | 2978 |
| **Declarations of Assets** | | 13 | 726 | 2 | 9 |
| **Publication of meetings** | | 5970 | 16823 | 20415 | 11707 |
| **Cases handled by the Advisory Committee** | **Referrals by the President** | 4 | 1 | 2 | 0 |
| | **Guidance** | 1 | 0 | 1 | 1 |
| | **Direct signalling** | 1 | 3 | 3 | 8 |
| | **Monitoring** | 0 | 2 | 1 | 3 |

*Start of the 10th legislative term

## 3.5. TREND ANALYSIS GRAPHS

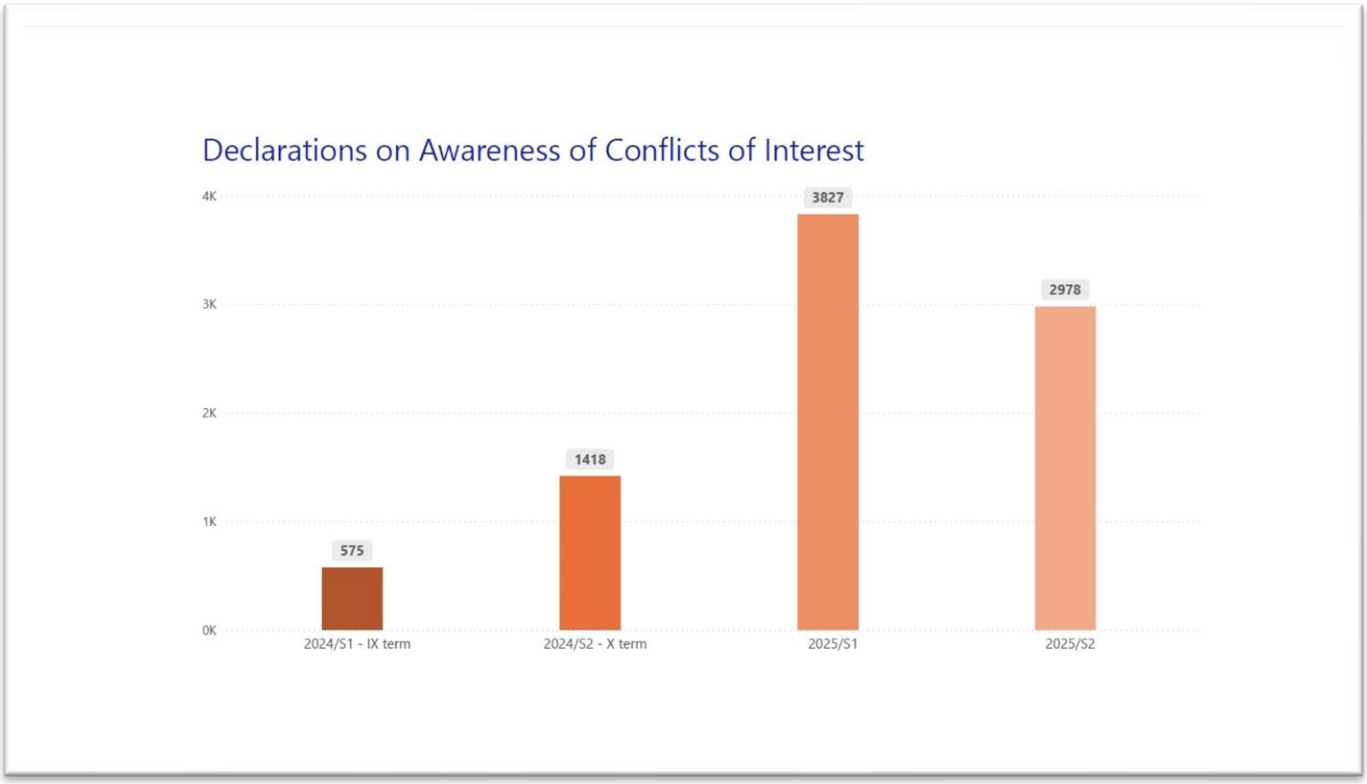
**Source of data: internal statistics of Members' Administration Unit**



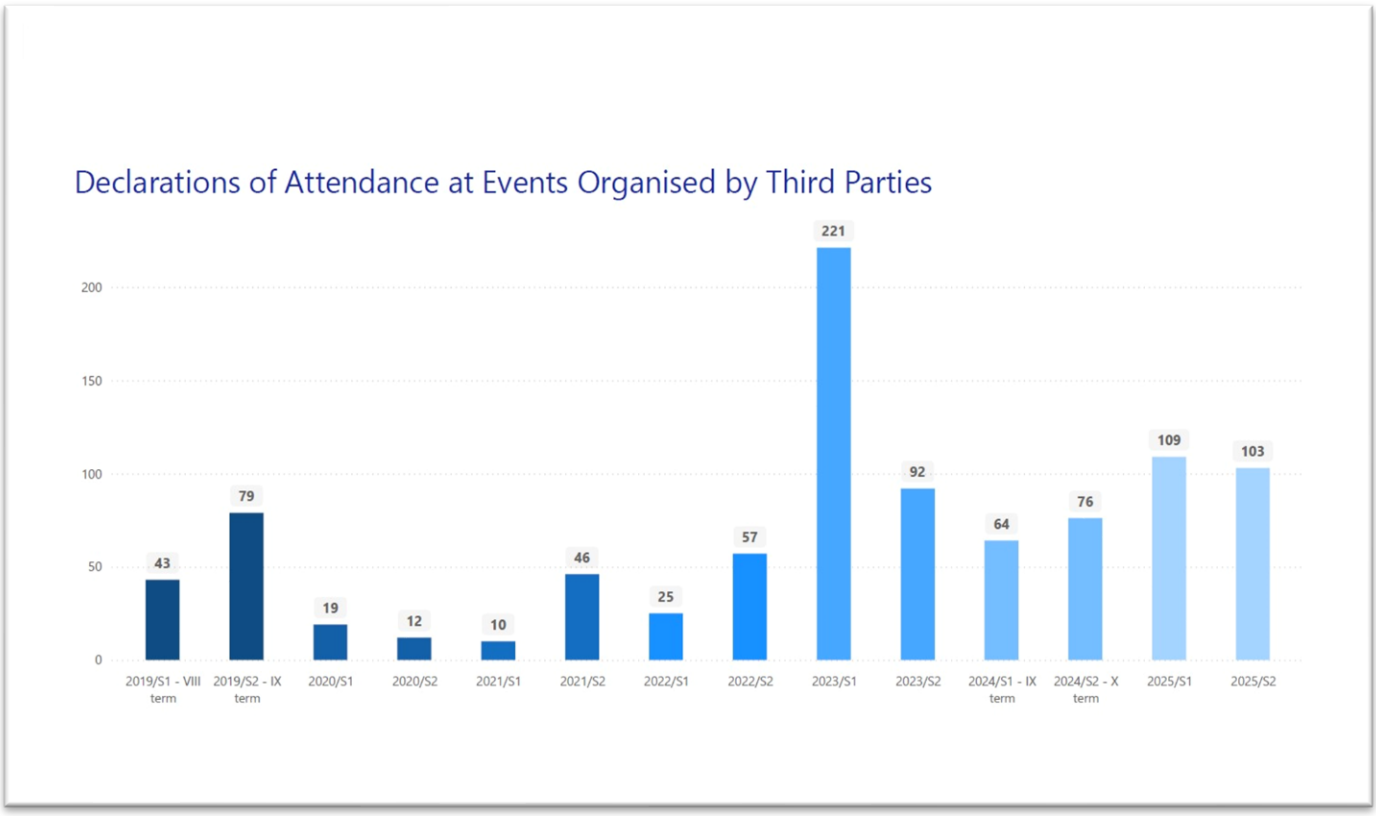

**The green line shows the declarations of private interests (DPI) at the start of the mandate [named declarations of financial interests (DFI) until November 2023]. All the incoming members have submitted their declarations on time.**

**The orange line represents the number of updated declarations. The updates shall be made at the latest by the end of the month following a change. Between November-December 2023, following the revision of the Code of Conduct, all sitting Members had to submit a new declaration of private interests.**

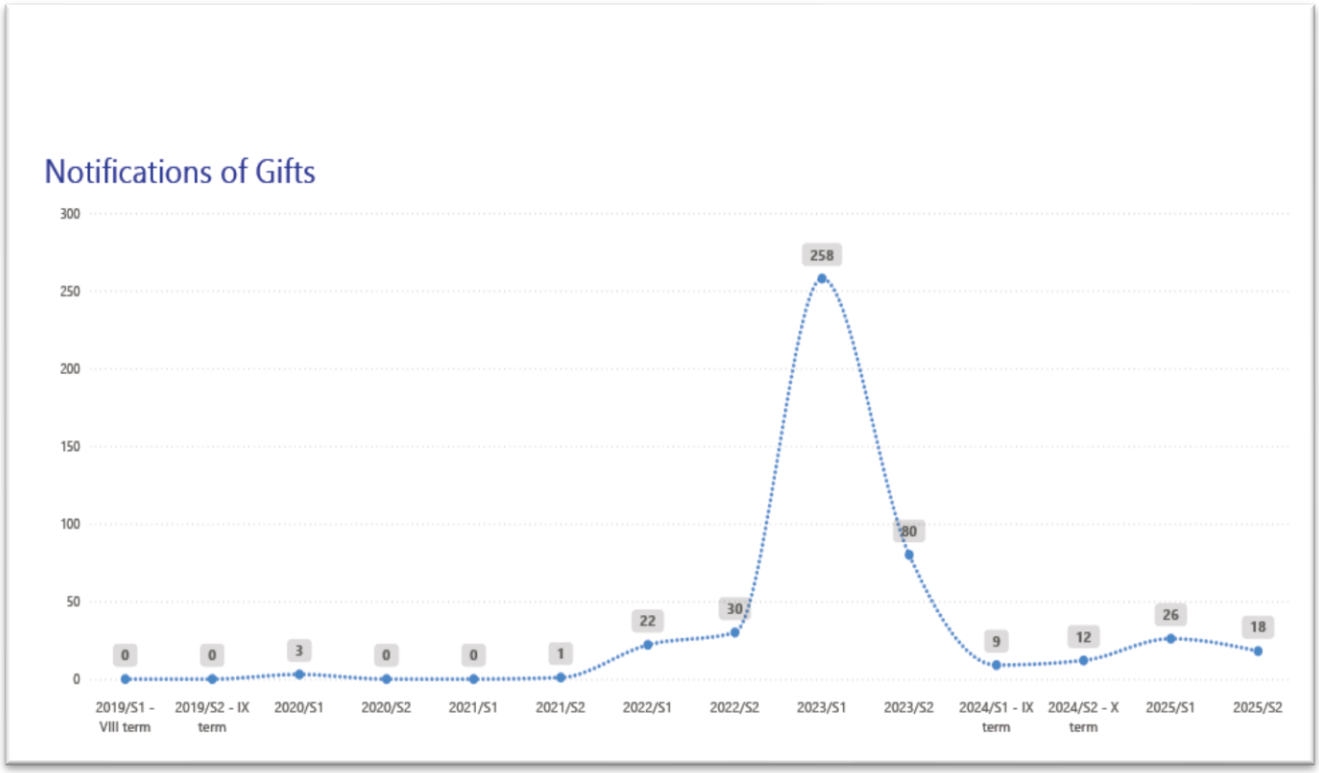
**Compared to the same period after the 2019 elections, there is a significant upward trend in the number of DPI updates in 2024 and 2025.**

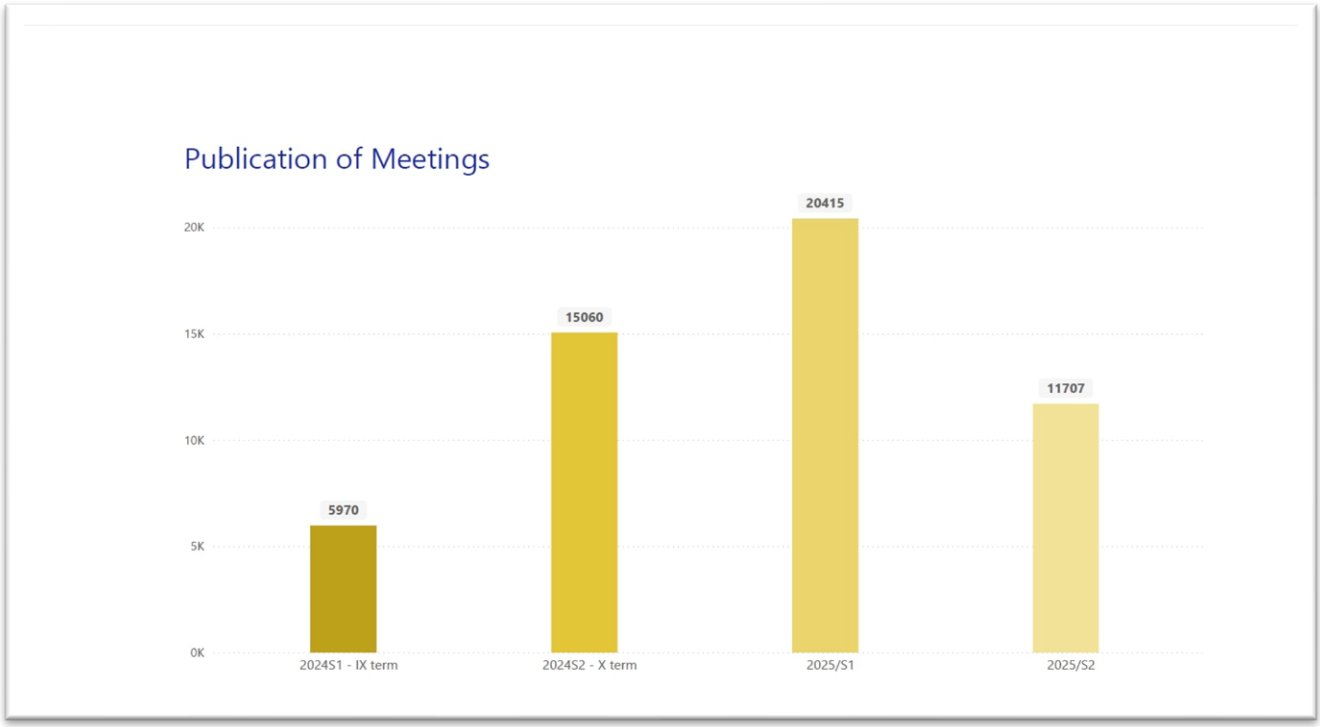



**The declarations on awareness of conflicts of interest were introduced in the revised Code of Conduct in November 2023.**

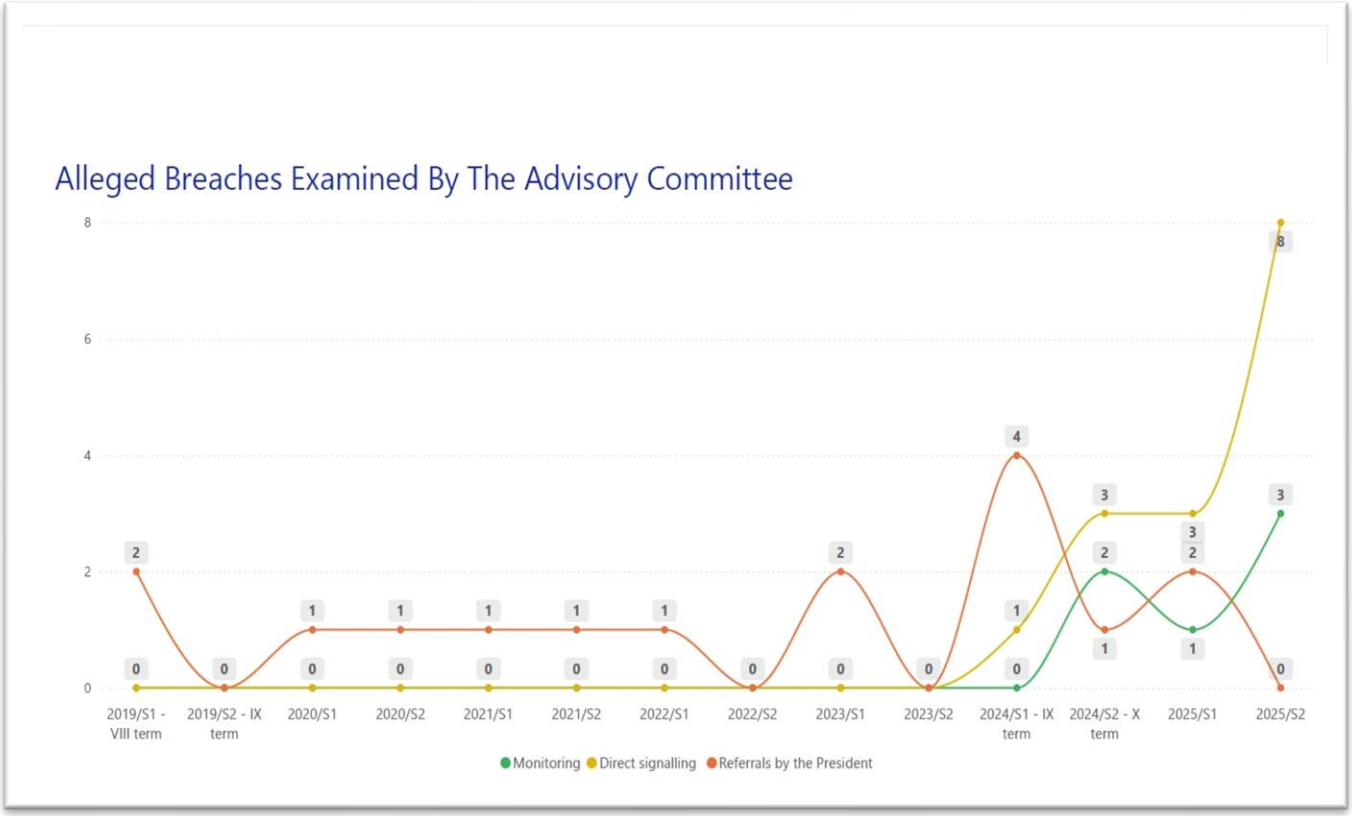



**The rules on declarations of attendance at third party events have not changed in essence. There is a clear upward trend in the number of declarations over the years.**




**In November 2023, the rules on publication of meetings with interest representatives of third country representatives were expanded to cover all members.**




**The data shows that direct signalling has become the main source of cases handled by the Advisory Committee. This demonstrates high public awareness about the revised rules both inside and outside of the European Parliament.**




**The data demonstrates that the workload of the Advisory Committee has steadily increased over time.**

## 4. ADMINISTRATION

The Members' Administration Unit in DG Presidency provides secretariat services to the Advisory Committee and has been designated by the Secretary-General as the competent service under Articles 7, 8, 9, 14 and 15 of the Implementing Measures.

Its contact details are as follows:

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European Parliament

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