

## **Decision No MB/2025/09**

### **of the Management Board of the Agency for Support for BEREC (BEREC Office) setting out ethics rules and rules on the prevention and management of conflicts of interest in respect of the staff members of the BEREC Office**

#### **The Management Board of the BEREC Office,**

Having regard to the Treaty on the Functioning of the European Union,

Having regard to the Staff Regulations of Officials ('SR') and the Conditions of Employment of Other Servants of the European Union ('CEOS'), laid down by Council Regulation (EEC, Euratom, ECSC) No 259/68<sup>1</sup>, and in particular Title II of the SR and Articles 11 and 81 of the CEOS<sup>2</sup>,

Having regard to Regulation (EU) 2018/1971 of the European Parliament and of the Council of 11 December 2018 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Agency for Support for BEREC (BEREC Office), amending Regulation (EU) 2015/2120 and repealing Regulation (EC) No 1211/2009<sup>3</sup> ('Founding Regulation'), and in particular Article 42 (1)-(3),

Having regard to the Communication C(2014)6543 final of 26 September 2014 from Vice-President Šefčovič to the Commission on the guidelines on the implementation of Article 110(2) of the SR with regard to the implementing rules applicable in the agencies, and in particular Point 3.4 thereof,

Having regard to the agreement of the European Commission pursuant to Article 110 (2) of the SR - C(2025) 3718 final<sup>4</sup> of 05/06/2025, ,

Having consulted the Staff Committee,

Whereas:

- (1) All BEREC Office staff members are to carry out their duties and conduct themselves solely with the interests of the BEREC Office in mind, notably they are to carry out the assigned duties objectively, impartially and in keeping with their duty of loyalty to the BEREC Office.
- (2) In accordance with Article 42 (1) of the Founding Regulation, the Members of the Management Board, the Director, seconded national experts and other staff not

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<sup>1</sup> OJ L 56, 4.3.1968, p. 1. 1, ELI: [http://data.europa.eu/eli/reg/1968/259\(1\)/oj](http://data.europa.eu/eli/reg/1968/259(1)/oj).

<sup>2</sup> Articles 11 to 26a of the Staff Regulations are applicable by analogy to temporary agents and contract agents, pursuant to Articles 11 and 81 of the CEOS, respectively. Any reference in this Decision to those Articles of the Staff Regulations shall be understood as applicable by analogy to temporary and contract staff by virtue of Articles 11 and 81 of the CEOS.

<sup>3</sup> OJ L 321, 17.12.2018, p. 1–35, ELI: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R1971&qid=1713425754998>

<sup>4</sup> Commission Decision of 5 June 2025 on the agreement to the adoption by the Agency for Support for BEREC of its implementing rules setting out ethics rules and rules on the prevention and management of conflicts of interest concerning the staff members of the BEREC Office

employed by the BEREC Office should each make a written declaration indicating their commitments and the absence or presence of any direct or indirect interests that might be considered to prejudice their independence.

- (3) Such declarations should be made at the time of taking up responsibilities, should be accurate and complete, and should be updated where there is a risk of there being any direct or indirect interest that might be considered to prejudice the independence of the person making the declaration.
- (4) The declarations made by the Members of the Management Board and the Director should be made public.
- (5) In accordance with Article 42(2) of the Founding Regulation the Members of the Management Board, the Director, seconded national experts and other staff not employed by the BEREC Office should each accurately and completely declare, at the latest at the start of each meeting, any interest which might be considered to be prejudicial to their independence in relation to the items on the agenda, and should abstain from participating in the discussion and the voting on, such points.
- (6) In accordance with Article 42(3) of the Founding Regulation the Management Board should lay down the rules for the prevention and management of conflicts of interests and, in particular, for the practical arrangements for the application of Article 42 (1) and (2).
- (7) Provisions on conflicts of interest are already included in various documents, such as the SR, the CEOS, the Financial Rules<sup>5</sup>, the BEREC Office Management Board Decision laying down rules on preventing and managing conflicts of interest concerning the members of the Management Board<sup>6</sup>, the Rules of Procedure of the BEREC Office Management Board<sup>7</sup> and Decision on the secondment to the BEREC Office of national experts and national experts in professional training.
- (8) These rules should be complemented to reflect the requirement of the Founding Regulation and the specificities of the set up of BEREC and the BEREC Office and the link between their activities.

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<sup>5</sup> Article 61 of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012, OJ L 193, 30.7.2018, p. 1–222, [https://eur-lex.europa.eu/search.html?DTA=2018&SUBDOM\\_INIT=ALL\\_ALL&DTS\\_SUBDOM=ALL\\_ALL&DTS\\_DOM=ALL&or0=DN-old%3D32018\\*1046\\*%2CDN-old%3D52018\\*1046\\*%2C&lang=en&type=advanced&qid=1713514191854&DTN=1046](https://eur-lex.europa.eu/search.html?DTA=2018&SUBDOM_INIT=ALL_ALL&DTS_SUBDOM=ALL_ALL&DTS_DOM=ALL&or0=DN-old%3D32018*1046*%2CDN-old%3D52018*1046*%2C&lang=en&type=advanced&qid=1713514191854&DTN=1046) and Article 42 of Decision No MB/2019/13 of the Management Board of the Agency for Support for BEREC (BEREC Office) on the financial regulation applicable to the BEREC Office, <https://berec.europa.eu/en/document-categories/berec-office/decisions-of-the-management-board/decision-no-mb201913-of-the-management-board-of-the-berec-office-on-the-financial-regulation-applicable-to-the-berec-office>

<sup>6</sup> Decision No MB/2019/16 of the Management Board of the Agency for support for BEREC (BEREC Office) laying down rules on preventing and managing conflicts of interest concerning the members of the Management Board, <https://berec.europa.eu/en/document-categories/berec-office/decisions-of-the-management-board/decision-no-mb201916-of-the-management-board-of-the-agency-for-support-for-berec-berec-office-laying-down-rules-on-preventing-and-managing-conflicts-of-interest-concerning-the-members-of>

<sup>7</sup> MB (19) 95 rev.1, Rules of Procedure of the Management Board of the BEREC Office, <https://berec.europa.eu/en/document-categories/berec-office/rules-of-procedure/rules-of-procedure-of-the-management-board-of-the-berec-office-0>

- (9) It is therefore necessary to adopt at Management Board level in accordance with Articles 16 (1) (j) and 42 (3) of the Founding Regulation, Title II of the SR and Articles 11 and 81 of the CEOS the present decision applying to the BEREC Office staff, including the Director, without prejudice to the existing rights and obligations related to conflicts of interest provided in other applicable documents mentioned under recital 7. By implementing the SR and the CEOS, this decision aims to complement the existing rules and to serve as a reference for the staff members of the BEREC Office and ensures a comprehensive and coherent approach to conflicts of interest and the highest standards of administration, professional ethics, integrity and independence,

HAS ADOPTED THE FOLLOWING DECISION:

## **CHAPTER I**

### **SCOPE, GENERAL OBLIGATIONS AND DEFINITION**

#### **Article 1**

##### **Subject**

The present Decision lays down rules for the prevention and management of conflicts of interest of the BEREC Office staff members in order to ensure the handling in a transparent and consistent manner of situations where conflicts of interest may arise.

#### **Article 2**

##### **Scope and persons concerned**

1. This Decision shall apply to the following categories of actors involved in the work and activities of the BEREC Office:
  - contract staff,
  - temporary staff<sup>8</sup>.for the purposes of this decision collectively referred as "staff members". The rules apply by analogy to seconded national experts (SNEs), as stipulated in Article 12(2) of this Decision.
2. All staff members of the BEREC Office shall carry out their duties and conduct themselves solely with the interests of BEREC and the BEREC Office in mind. All staff members shall carry out their duties objectively and impartially and in keeping their duty of loyalty to the BEREC Office. All staff members shall abstain from any action adversely affecting the reputation of BEREC and the BEREC Office.

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<sup>8</sup> According to Article 32 (1) of the Founding Regulation, this category shall also include the Director of the BEREC Office.

## **Article 3**

### **General principles on conflict of interest and personal interest**

1. Staff members should not, in the performance of their duties, deal with a matter in which, directly or indirectly, they may have any personal interests such as to impair their independence as this would compromise or reasonably be perceived to compromise the impartiality and objectivity of a decision, opinion or recommendation of the BEREC Office.
2. Relevant personal interest may notably be of a financial or non-financial nature and it may also concern a personal or family relationship, any representation of any other interests of third parties or a community of interests with any third parties, any professional or economic affiliation, as well as any other outside activities leading to the situation described in paragraph 1.
3. The perception of a conflict of interest can constitute a reputational risk to the BEREC Office. Therefore, taking due consideration of proportionality, specific backgrounds, all relevant facts and mitigating circumstances, a risk of perceived conflict of interest shall be treated as if it were an actual conflict of interest.
4. It is the responsibility of all staff members to ensure that their conduct is in line with the rules regarding the provisions on the conflict of interest in both letter and spirit. Each staff member of the BEREC Office shall assume an individual responsibility by declaring in good faith his/her interests and information to the BEREC Office in compliance with the provisions of this decision and of the SR/CEOS.
5. Article 11a of the SR applies to any staff member. Any staff member, who becomes aware of a real, potential or perceived conflict of interest, must immediately inform in writing the relevant competent authority.
6. The BEREC Office shall raise awareness about conflicts of interest among staff members through training, sessions addressed to newcomers and information disseminated to staff via appropriate channels.

## **Article 3a**

### **Specific provisions regarding the Director**

1. In accordance with Article 20(3) of the Founding Regulation, without prejudice to the powers of the BEREC Board of Regulators, the BEREC Office Management Board and the Commission, the Director shall be independent in the performance of his or her duties and shall neither seek nor take instructions from any government, institution, person or body.

In particular, the Director shall act impartially, avoiding any situation liable to give rise to any actual, potential or perceived conflicts of interest. Taking into account the public character of his/her function when acting under the tasks and roles laid down in the Founding Regulation, the Director shall perform his/her tasks objectively, impartially and with independence in line with his/her duty of loyalty to the BEREC Office. He/she shall act in the general interest of BEREC and the BEREC Office and in the interest of its sound management and objectives.

2. When questions which are not explicitly covered by these rules arise, adherence to the generally accepted principles of probity shall determine the behaviour of the Director.

The Director shall:

- (1) Guarantee that under his/her role of authorising officer, the BEREC Office operates within the limits of its statutory remit and rules;
- (2) Represent the views of the BEREC Office when communicating on a matter on which the BEREC Office has taken a view; when communicating on a matter that falls within the remit of the BEREC Office but on which the BEREC Office has not taken a view so far, the Director may give his/her own personal view, but should make it clear that this does not necessarily represent the official opinion of the BEREC Office. The Director should always refrain from any unauthorised disclosure of information or documents received in the line of duty that have not already been made public or are accessible to the public;
- (3) Not exploit his/her position in order to influence the expected impartiality of the BEREC Office staff members, external experts, reviewers, consultants and any third parties participating at any title in the bodies or activities of the BEREC Office.

### **Article 3b**

#### **Specific Declaration of Conflict of Interest (meeting)**

1. In accordance with Article 42(2) of the Founding Regulation, where a situation of a conflict of interest, not covered by an initial Declaration of Conflict of Interest already submitted, arises, the Director shall accurately and completely declare, at the latest at the start of each meeting, any interest which might be considered to be prejudicial to his/her independence in relation to the items on the agenda.
2. The individual declaring a conflict of interest shall abstain from participating in the discussion and/or the voting on, such points.
3. Conflict of interests need to be declared for three years after which the interest or relevant circumstance ceases to exist
4. Conflict of interests declared during meetings shall be recorded in the minutes of the meeting where the conflict of interest arises.

In such case the procedure of Article 11 shall not apply.

## **Article 3c**

### **Obligation to make declarations on commitment**

In accordance with the provisions of Article 42 (1) of the Founding Regulation, the Director and seconded national experts shall each make a written declaration indicating his/her commitments.

Such declaration shall be made at the time of taking up responsibilities, using the relevant form.

## **CHAPTER II – PROVISIONS APPLICABLE TO STAFF MEMBERS**

### **Article 4**

#### **Obligation to make declarations of conflict of interest**

1. Before recruitment in the BEREC Office or returning from unpaid leave, the Authority authorized to conclude contracts of employment (AACC)<sup>9</sup> shall examine whether the candidate/staff member has any personal interest such as to impair his/her independence.

To that end, the candidate or staff member shall submit the declaration of conflict of interest using the relevant form.

As regards the recruitments, the members of a Selection Committee shall submit before taking up their duties the declaration on conflict of interest and confidentiality using a relevant form. Should the form show an actual, potential or perceived conflict of interest, the AACC authority shall decide on the continuation or withdrawal of the member from the Selection Committee.

In cases where the declaration shows an actual, potential or perceived conflict of interest, it must be managed and solved before the staff member takes up or resumes his/her duties. It may result that recruitment cannot take place.

2. Staff members must promptly disclose all relevant information about a personal interest when circumstances change following their initial disclosure or when new situations arise. If at any time in the course of his/her duties a staff member becomes aware of any actual, potential or perceived conflict of interest, the staff member is obliged to inform the relevant authority in the BEREC Office by submitting the ad hoc declaration on conflict of interest, using the relevant form in the corporate HR system.

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<sup>9</sup> In the case of SNEs, any reference to the Authority authorised to conclude contracts of employment under this decision shall be understood as the Director, without prejudice to any delegation.

## **Article 5**

### **Obligation of confidentiality**

1. Staff members shall refrain from any unauthorised disclosure of information received in the line of duty unless that information has already been made public or is accessible to the public.
2. All staff members shall continue to be bound by this obligation after leaving the BEREC Office.

## **Article 6**

### **Obligations related to honours, decorations, favours and gifts**

1. Staff members shall not accept, directly or indirectly, without the prior permission of the AACC, any honour, decoration, favour, gift or payment of any kind whatsoever from any source outside the BEREC Office.

Criteria to be considered in this context are, in particular, if the acceptance of the gift or hospitality is counter to the interests of the service or presents an actual or perceived conflict of interest for the staff member concerned, or if such acceptance would be in accordance with diplomatic and courtesy usage.

Gifts and hospitality motivated solely by a family relationship or personal friendship, or in a context not related in any way to the staff member's duties do not, in principle, fall under these provisions. However, even here situations may arise when acceptance can be perceived as compromising the staff member's independence.

2. A gift is understood to mean:
  - a sum of money or any physical object, or
  - the possibility to participate for free in events which are either open to the public or private in nature, only accessible in return for payment and represent a certain value (such as complimentary tickets for sports events, concerts, theatre, conferences, etc.), or
  - any other advantage with a pecuniary value such as transport costs.
3. Hospitality offers are considered to be one particular type of favour. Hospitality is defined as an offer of food, drink, accommodation and/or entertainment from any source outside the BEREC Office.
4. As a general rule, Staff members should not accept gifts and should make use of sound judgement in order to assess, in the given circumstances, if acceptance could be envisaged. Acceptance of gifts or hospitality may exceptionally be authorised (within the limits indicated in paragraphs 5 and 7) when it is clear that this will not compromise or reasonably be perceived to compromise the staff member's objectivity and independence and will not damage the BEREC Office public image.
5. Subject to the general principles set out herein, the following apply:
  - a. Prior permission by the AACC is presumed to be granted for accepting a gift worth up to EUR 50;

- b. Explicit prior permission by the AACC is required for accepting a gift worth between EUR 50 and EUR 150, by submitting a declaration using the relevant form.
  - c. Authorisation to accept gifts with a value higher than EUR 150 or any sum of money, including vouchers, will be refused by the AACC.
- 6. If the AACC refuses to authorise the acceptance or if a gift is unwanted, it can be returned to the source, if this is feasible. Alternatively, the gift can be donated by the BEREC Office to an appropriate charitable organisation.

As a courtesy, the staff member shall inform the sender of the gift that the gift cannot be accepted and will be transmitted to charity, unless this would be diplomatically inappropriate.

- 7. As a general rule the staff member should not accept any hospitality and should make use of sound judgement in order to assess, in the given circumstances, if acceptance could be envisaged.

Subject to the general principles set out herein, the following apply:

- a. Prior permission by the AACC is presumed to be granted for:
  - hospitality in the form of lunches or dinners strictly linked to the function of the staff member and as such not prejudicial to the interests and public image of the BEREC Office, and in which the staff member participates in agreement with his/her hierarchy and in the interest of the service;
  - occasional offers of simple meals, refreshments, snacks.
- b. Explicit prior permission by the AACC is required in cases not covered by subparagraph (1), by submitting a declaration, using the relevant form.
- 8. As for the hospitality offered during missions, the mission order will as a rule cover all predictable offers of hospitality, based on the mission programme – notably meals, accommodation and transport (provided there is no conflict of interest). These will not be considered as hospitality offers if the programme of the mission and the participation of the staff member has been authorised, as they form part of the performance of his/her duties in the interest of the BEREC Office. The acceptance of these offers will then be declared in the mission expense statement.

Particular prudence is necessary in sensitive situations. For instance, staff members participating in inspections and similar missions should whenever possible inform their immediate superior or team leader on an ad hoc basis, and in accordance with any other specific provisions, when hospitality is offered in the course of such missions. If this is impossible, they should exercise their individual judgement and act according to the principles set out in these guidelines. Any hospitality thus accepted should be declared in the mission expense statement.

- 9. Accumulation of gifts and hospitality for which prior permission of the AACC is presumed may be seen to compromise the staff's objectivity and independence or may damage the BEREC Office public image. Therefore, it requires the prior permission by the AACC.



## **Article 7**

### **Obligations related to outside activities and occupational activities after leaving the service**

In accordance with the provisions of Article 110 of the SR, Commission Decision C(2018)4048 of 29.6.2018 on outside activities and assignments and on occupational activities after leaving the Service applies. Articles 12b and 16 of the SR are also applicable. According to Article 12b<sup>10</sup> of the SR, a staff member wishing to engage in an outside activity, whether paid or unpaid, or to carry out any assignment outside the Union, shall first obtain the permission of the AACC. Pursuant to Article 16<sup>11</sup> of the SR, a staff member shall, after leaving the service, continue to be bound by the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits. Staff members intending to engage in an occupational activity, whether gainful or not, within two years of leaving the service shall inform their institution thereof using a specific form. If that activity is related to the work carried out by the official during the last three years of service and could lead to a conflict with the legitimate interests of the institution, the appointing authority may, having regard to the interests of the service, either forbid him from undertaking it or give its approval subject to any conditions it thinks fit.

## **Article 8**

### **Obligations related to publications and speeches**

1. Staff members who intend to publish or cause to be published, either on their own or with other parties, a document, such as an article or a book, on anything dealing with their work for the BEREC Office or EU matters generally, shall inform the AACC in advance.

The staff member above shall submit the declarations using relevant forms, as the case may be, and provide the AACC with any information, in particular a copy, in electronic form, of the document he/she intends to publish. This must be accompanied by a summary of the document to be published, in electronic form, in English, which is the BEREC Office working language<sup>12</sup>.

Pursuant to Article 17a of the SR<sup>13</sup>, where the AACC is able to demonstrate that the matter is liable to seriously prejudice the legitimate interests of the Union, the AACC shall inform the staff member of its decision in writing within 30 working days of receipt of the information. If no such decision is notified within the specified period, the AACC shall be deemed to have had no objections.

2. Without prejudice to Article 17a of the SR, staff members, when publishing on any matter related to their work for the BEREC Office or any EU matter, shall indicate in

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<sup>10</sup> Applicable by analogy to temporary and contracts agents pursuant to Articles 11 and 81 of the CEOS.

<sup>11</sup> Applicable by analogy to temporary and contracts agents pursuant to Articles 11 and 81 of the CEOS.

<sup>12</sup> See, Decision MC/2016/02 on the working language regime at the BEREC Office, <https://berec.europa.eu/en/document-categories/berec-office/decisions-of-the-management-board/mc-decision-on-the-working-language-regime-at-the-berec-office>

<sup>13</sup> Applicable by analogy to temporary and contracts agents pursuant to Article 11 of the CEOS and Article 81 of the CEOS.

the document he/she wants to publish that he/she is writing under his/her own name, engaging himself/herself and not the responsibility of any EU institution or body. The staff member is obliged to observe the rules concerning non-disclosure of information and the confidentiality requirement on EU matters or related to his/her work in the BEREC Office.

## **Article 9**

### **Obligations related to election or appointment for public office**

1. Pursuant to Article 15(1) of the SR<sup>14</sup>, staff members who intend to stand for public office shall notify the AACC by submitting a declaration using the relevant form.
2. Pursuant to Article 15(2) of the SR, staff members who are elected or appointed to public office must immediately inform the AACC by submitting a declaration in the relevant form.
3. The AACC shall decide, in the light of the interests of the service, whether the official concerned should:
  - a. be required to apply for leave on personal grounds, or
  - b. should be granted annual leave, or
  - c. be authorised to continue his duties on a part-time basis, or
  - d. continue his duties as before.

## **Article 10**

### **Obligation to declare the professional activities of the spouse or partner**

1. Pursuant to Article 13 of the SR<sup>15</sup>, staff members have the obligation to inform the AACC if their spouse/partner is in gainful employment, i.e. doing paid work. In this respect, spouses and partners in accordance with Article 1(2) (c) of Annex VII to the SR are regarded in the same way<sup>16</sup>.
2. The staff members shall submit a declaration using the relevant form. If there is any change in the spouse's or partner's situation, the staff member is obliged to submit a new declaration.

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<sup>14</sup> Applicable by analogy to temporary and contracts agents pursuant to Article 11 and Article 81 of the CEOS.

<sup>15</sup> Applicable by analogy to temporary and contracts agents pursuant to Article 11 and Article 81 of the CEOS.

<sup>16</sup> Article 1d(1) of the SR mentions that "non-marital partnerships shall be treated as marriage provided that all the conditions listed in Article 1(2)(c) of Annex VII are fulfilled" ; Article 1(2)(c) of Annex VII to the SR sets out these conditions as follows: "(i) the couple produces a legal document recognised as such by a Member State, or any competent authority of a Member State, acknowledging their status as non-marital partners, (ii) neither partner is in a marital relationship or in another non-marital partnership, (iii) the partners are not related in any of the following ways: parent, child, grandparent, grandchild, brother, sister, aunt, uncle, nephew, niece, son-in-law, daughter-in-law, (iv) the couple has no access to legal marriage in a Member State; a couple shall be considered to have access to legal marriage for the purposes of this point only where the members of the couple meet all the conditions laid down by the legislation of a Member State permitting marriage of such a couple".

## **Article 11**

### **Procedures to manage a conflict of interest**

With regard to the staff members the AACC is responsible for adopting formal decisions to prevent and manage conflicts of interest, when informed of a situation which may be detrimental to the BEREC Office.

The AACC shall carry out an internal assessment involving the legal officers, the entity in charge of human resources, the line manager of the staff member concerned or any other persons, including the staff member concerned, as deemed necessary.

Based on the findings of the assessment, the AACC shall decide in writing the necessary measures in accordance with the applicable rules.

## **Article 12**

### **Ex-post treatment of situations of non-compliance with the obligations under the present rules**

1. In accordance with Article 86(1) of the SR<sup>17</sup>, any failure by staff members of the BEREC Office to comply with his/her obligations under the rules of conflicts of interest, whether intentionally or through negligence on his/her part, shall make him/her liable to disciplinary measures, in accordance with the provisions of the SR and the CEOS, with the respect of the procedural safeguards laid down therein.
2. SNEs shall comply with the obligations imposed by the present Decision on conflicts of interest. Failure to observe the obligations provided herein entitles the BEREC Office to terminate the collaboration, subject to respecting the procedural safeguards of the seconded national expert concerned, notably, including the right to be informed in advance of the reasons underlying the AACC's intention to terminate the collaboration and giving him/her the opportunity to be heard.
3. If the concerned person was involved in a decision-making procedure without having declared an interest, the AACC or the respective body or group may undertake remedial actions, in particular to review or cancel the decision if seriously affected by the conflict of interest, without prejudice to the acquired rights of the third parties to the BEREC Office. This implies carrying out an ex-post review of the person's activities and contributions to the BEREC Office output.

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<sup>17</sup> Applicable by analogy to temporary and contract agents pursuant to Articles 50a and 119 of the CEOS, respectively.

## **CHAPTER III – GENERAL AND FINAL PROVISIONS**

### **Article 13**

#### **Register**

1. All the declarations made by staff members shall be clearly recorded in a register by the BEREC Office. This will enable the BEREC Office to demonstrate, if necessary, that a specific conflict of interest has been appropriately identified and managed.<sup>18</sup>
2. The register referred to in paragraph 1 shall be maintained in compliance with the applicable provisions of Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

### **Article 14**

#### **Transparency**

1. The BEREC Office shall publish on its website the policies and rules for the prevention of conflict of interest in a clear and easily identifiable manner.
2. The declarations of conflict of interest and of commitments submitted by the Director shall be available for public scrutiny with due respect to the applicable EU rules on protection of personal data and access to documents. Where deemed relevant, the Management Board may decide that the CV or a summary of the professional experience shall also be made available.

### **Article 15**

#### **Final provisions**

1. The Director of the BEREC Office may adopt guidelines to facilitate the implementation of the present Decision.
2. Any permission granted by the AACC pursuant to a declaration submitted by staff members shall be limited to the specific situation described in the declaration and cannot be extended to other instances of conflict of interest.  
  
Any change of the initial situation described in the declaration and approved by the AACC shall be considered as a new situation and must be brought to the attention of the AACC.
3. These rules shall take effect on the date of their adoption by the Management Board and shall be published on the website of the BEREC Office.

Done at Sofia, on 3 October 2025.

**For the Management Board**

(e-signed)

**Robert Mourik**

**Chairperson**

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Measures adopted to manage the conflicts of interest are filed in the personal file of each staff member.