



Public Declaration of Interests (PDol) and Declaration of Confidentiality of the members of the EEA SMT

This form consists of two parts, the Public Declaration of Interests (PDol) and the Declaration of Confidentiality.

It applies to the members of the European Environment Agency (EEA) Senior Management Team (SMT). Both parts of the form should be fully completed by members before taking up their function in the EEA SMT and then on a recurring annual basis, when needed (i.e. changes to the information provided the previous year).

Public Declaration of Interests

A conflict of interest is defined by the Organisation for Economic Co-operation and Development (OECD) guidelines as “a conflict between the public duties and private interest of a public official, in which the public official has private-capacity interests which could improperly influence the performance of their official duties and responsibilities”¹.

In addition, within the specific environment of the EEA and considering the general EU institutional framework, the following guidance from the European Commission² is applied: “situations of conflict of interest can arise when:

- there is some link between staff members' work and their private interest, or those of their family or partner;
- staff members find themselves in a situation that could reasonably lead to allegations being made if bias or partiality, in the light of their personal interests.

It should be noted on the one hand that having an interest does not necessarily mean having a conflict of interest. In particular high quality of expertise is by nature based on prior experience. Declaring an interest does therefore not automatically disqualify a person or limits his/her participation in the activities of the Agency.

On the other hand it should be emphasised that this Public Declaration of Interests form does not contain an exhaustive list of potential interests and that all other elements that might jeopardise your independence when working with the Agency shall thus also be indicated.

Based on the information provided in the form, and in accordance with the Commission's “Practical Guide to Staff Ethics and Conduct” the Agency will carry out an assessment on the qualification or limitation of an individual person's participation in the activities of the Agency.

First name: Karl

Surname: HAMILTON

Function: Head of Programme, Data and Information Services

Starting date of work with/for EEA: 01.03.2024

I, Karl HAMILTON, do hereby declare to the best of my information, knowledge and belief that:

- I have no interests to declare in the field of EEA activities*
- I have recorded the following interests in the field of EEA activities*

* *check as applicable*

(whether or not you have indicated an interest, please complete the following tables, and in particular if indicated an interest specify the interests that you and/or your **close family members**³ currently have or have had in the **past 5 years**).

¹ OECD guidelines for managing Conflict of Interest in the public service (2005).

² <https://myintracomm.ec.europa.eu/staff/EN/staff-conduct/individual-obligations/conflict-of-interest/Pages/conflict-of-interest.aspx>

³ For this purpose, 'close family members' are considered to be the persons forming a household with the person making the declaration (spouse, partner, and/or dependent children).



Public Declaration of Interests (PDol) and Declaration of Confidentiality of the members of the EEA SMT

Title/Function (you or your close family members)	Period of activity (within past 5 years)	Company⁴ or organisation⁵	Products and/or projects and/or activity reference (in the field of EEA activities)	Description of the activity (including contracts with EEA)
1. Employment with a company or an organisation, including any contractual link (e.g. leave on personal grounds/secondment)				
Head of Digital Change	August 2020 – February 2024	European Medicines Agency (EMA)	N/A	EMA is an Agency of the European Union
2. Consultancy, legal representation, advice with a company or an organisation				
None				
3. Member of a Managing Board or equivalent structure of a company or an organisation				
None				
4. Member of an Advisory Board or equivalent structure of a company or an organisation				
None				
5. Other membership or affiliation				
None				
6. Research funding from a company or an organisation, including grants, rents, sponsorships, fellowships, non-monetary support				
None				
7. Intellectual property rights (e.g. patent, trademark, copyright or proprietary know-how)				
None				
8. Investments in a company or an organisation, including holding of stocks and/or shares, stock options, equity, bonds, partnership interest in the capital of such undertaking, one of its subsidiaries or a company				
Spouse	Present	Salesforce, Inc. Box.com	EEA is an existing user of Salesforce software (Tableau)	Spouse is a shareholder as a current employee (Salesforce) and as a former employee (Box.com). EEA is an existing user of Salesforce (Tableau), acquired prior to staff

⁴ This includes any commercial business, industry association, consultancy, research institution or other enterprise whose funding is significantly derived from commercial sources. It also includes independent own commercial business, law offices, consultancies or similar.

⁵ An 'organisation' includes governmental, international or non-profit organisations.



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Title/Function (you or your close family members)	Period of activity (within past 5 years)	Company⁴ or organisation⁵	Products and/or projects and/or activity reference (in the field of EEA activities)	Description of the activity (including contracts with EEA)
				member engagement. EEA is not a user of Box.com.
9. Public statements and positions for a company or an organisation as part of a regulatory, legislative or judicial process				
None				
10. Other relevant information that could be seen as jeopardising your independence when working for the Agency				
None				

Further to the interests declared above, I do hereby declare on my honour that, to the best of my information, knowledge and belief that I have declared all interests that should be made to the Agency.

Should there be any change to the information provided above due to the fact that I acquire additional interests, I shall promptly notify the Agency and complete a new Public Declaration of Interests.

I understand that this Public Declaration of Interests might be published on the EEA website.

The Agency will handle the information provided above in accordance with Regulation (EU) 2018/1725⁶.

⁶ Regulation (EU) 2018/1725 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.



Declaration of Confidentiality

In view of the following definitions:

"Confidential Information" means all information, facts, data and any other matters, of which I acquire knowledge, either directly or indirectly, as a result of my EEA activities, and whose unauthorised disclosure could cause prejudice to EEA, the EU or a third party unless this has already been made publicly available.

"Confidential Documents" mean all drafts, preparatory information, documents and any other material, together with any information contained therein, to which I have access, either directly or indirectly, as a result of my participation in EEA activities, and whose unauthorised disclosure could cause prejudice to EEA, the EU or a third party unless this has already been made publicly available. Furthermore, any records or notes made by me relating to Confidential Information or Confidential documents shall be treated as Confidential Documents.

I understand that I may be invited to participate either directly or indirectly in certain EEA activities and hereby undertake:

- To treat all Confidential Information and Confidential Documents under conditions of strict confidentiality.
- Not to disclose (or authorise any person to disclose) any Confidential Information or Confidential Document to third parties, unless they can demonstrate their need to access that information to be able to perform a function or task falling within the Agency sphere of responsibility, and that the Agency has accepted that disclosure is appropriate for the intended purpose.
- Not to use (or authorise any other person to use) any Confidential Information or Confidential Document other than the purposes of my work in connection with EEA activities.
- To dispose of Confidential Documents as confidential material as soon as I have no further use of them.

This declaration shall not be limited in time, but shall not apply to any document or information that I can reasonably prove was known to me before the date of this declaration or which becomes public knowledge otherwise than a result of a breach of any of the above undertakings.

First name: Karl
 Surname: HAMILTON
 Function: Head of Programme, Data and Information Services


 07/05/24

In accordance with the applicable implementing rules and provisions, this form shall be used for the assessment of the Public Declaration of Interests completed by the members of the Senior Management Team, except for the Executive Director.

The assessment aims at determining whether a potential or an actual Conflict of Interest exists which could impair the impartiality and the independence of the member of the SMT (i.e. jobholder) who completed a PDol in performing his or her duties and responsibilities.

Note: After signature of the Executive Director this assessment shall be sent to the Human Resource Management (by confidential internal dispatch) for filling in the personal file and a copy provided to the concerned Jobholder.

Information on the Annual Declaration of Interest:

Date of ADol completion: 15/03/2024

First Declaration: <input checked="" type="checkbox"/>	Updated Declaration: <input type="checkbox"/>
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Assessment of the PDol by the Executive Director

Conflict of Interest confirmed	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
Type of Conflict of Interest	Potential: <input checked="" type="checkbox"/>	Actual: <input type="checkbox"/>
Description of Conflict of Interest (if different)	<p>The product for which K. Hamilton's spouse has a financial interest has been bought and used by the EEA prior to K. Hamilton's engagement.</p> <p>However, the declared financial interest in a product used by the EEA could lead to the perception of conflict of interest in the future.</p>	
Hearing of the Jobholder	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
Result of the hearing if performed		
Request for waiver	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
Reason for waiver (if different)		

Executive Director's Decision:

The result of the assessment of the PDol does not prevent K. Hamilton to perform his activities in EEA, as Head of Programme, Data and Information Services.

However, to mitigate the risk of perception of potential conflict of interest in the future, K. Hamilton will not be signing any financial transactions, nor contractual commitment in relation to Salesforce software (Tableau) used in EEA. These actions will be delegated to another authorising officer, namely Søren B. Nielsen, Head of Administrative Services.

Date & Signature of the Executive Director:

Qualified electronic signature by:

LEENA KAISA YLÄ-MONONEN

Date: 2024-05-06 12:11:08 +02:00

