

DECLARATION OF INTEREST

First Name: Silvia
Surname: Michelini
Profession: Official European Commission
Involvement with eu-LISA: Member of Management Board

hereby declares any financial, professional, or other interests, whether related or unrelated to eu-LISA, that may be relevant to their position or responsibilities and that could influence or be perceived to influence their decision-making.

Each of the four sections must be completed unless otherwise indicated; if you have no relevant interests to declare in a section, please write "N/A".

1. Financial Interests

Please declare any actual or estimated direct financial interests equal or over EUR 10,000 net per year, including:

- Income from any other sources, outside of your current role as a staff member¹
- Ownership stakes in companies, patents, or intellectual property rights.
- Investments, such as shares or securities in companies.
- Grants, sponsorships, or other funded benefits, including training, or certifications.

Excluded: mutual funds, personal insurance, managed portfolios, or regular bank deposits.

Financial interest ⁴	Period ¹ from/to (MM/YY)	Organisation ²	Subject matter ³
N/A			
N/A			

2. Current and Past Activities of the Staff member

Please list any **current** or **past employment activities** from the last three years, including unpaid leave, and any past work for eu-LISA (for example, as a contractor). Please exclude your current role as a staff member.

Current and past activities over the last 3 years			
Current and past activities ⁵	Period ¹ from/to (MM/YY)	Organisation ²	Subject matter ³
N/A			
N/A			

¹ This declaration doesn't replace the request for authorization for outside activity (Art 10 IR / 12b SR)

3. Spouse or Partner's Gainful Employment

In accordance with **Article 13 of the Staff Regulations**, you must declare whether your **spouse or legally recognized partner** is engaged in **gainful employment** (i.e., paid work)².

Household members' current activity ⁶	Period ¹ From/To (Month/year)	Organisation ²	Subject matter ⁷
N/A			
N/A			

4. Other Relevant Interests of the Declarant and Close Relations

This section applies to all declarants, their **spouse or legally recognized partner, dependent family members** (direct descendants under 21 or financially dependent), and any other **close personal relationships** that may give rise to an **actual or perceived conflict of interest**.

Please declare any activities, financial interests, or other relevant interests, past or current, held by you (except your current formal role) or your close relations that fall within **eu-LISA's remit** and could **influence or be perceived to influence decision-making**. This includes interests or roles held by close relations if they may present a potential conflict of interest, for example:

- **Memberships** in professional, trade, or lobbying organizations
- **Non-remunerated positions**, such as honorary roles, advisory boards, or charity involvement
- **Any personal or family affiliations** that could affect your impartiality

Any other relevant interests ⁸	Period ¹ From/To (Month/year)	Description ⁹
N/A		
N/A		
N/A		
N/A		

² This information serves the purpose of assessment of any potential conflict of interests and does not replace an obligation of the staffmember to provide or update such information in Sysper for the purpose of the JSIS coverage or management of individual entitlements.

I confirm that (please indicate the relevant point below):

I believe that I have a conflict of interest with respect to the following eu-LISA activity (please specify below).

Or

I believe I do not have conflict of interest related to my activities or links to eu-LISA.

I declare that I have read the eu-LISA Rules on the prevention and management of conflict of interests³ and that the above declaration is truthful and complete.

Date: 19/03/2026 Signature: SIGNED IN ORIGINAL

If you need more sheets to declare your interests, do not hesitate to use blank ones or to ask for them, but please sign each one of them and attach them to this form.

Definition of conflict of interests

A conflict of interest generally refers to a situation where the impartiality and objectivity of a decision, opinion or recommendation of eu-LISA is or might be perceived as being compromised by a personal interest held or entrusted to a given individual.

³ Decision 2020-405 of 23.12.2020 of the Management Board of eu-LISA on the implementing rules on the prevention and management of conflicts of interests of the staff members

DATA PROTECTION¹

The purpose of the processing operations aims at avoiding conflicts of interests to protect the integrity of eu-LISA decisions from illegitimate interests. For more information on processing of DoI, consult *eu-LISA Record of Processing Activity*².

The MB Secretariat of the eu-LISA collects, keeps, and safeguards all DoIs completed by the MB and AG members, in line with the form in Annex 1, together with assessments results as items of the MB and AG files.

Data subjects can exercise their rights of access and rectification of the factual data at any time before the closure of the assessment by contacting the unit at management-board@eulisa.europa.eu

The categories of data processed are: name, position, previous or current employments, ownership or other investments including shares, membership of a managing body or entity, intellectual property rights, spouse/partner's/dependent family members current activity, and other relevant interest, which might create a conflict of interest in the performance of duties of the declarant.

DoIs may be completed on paper or electronically.

The recipients of the DoI are the persons and bodies identified in these rules. DoIs may be transferred to bodies in charge of a monitoring or inspection task in conformity with Union Law, including the European Court of Auditors, the Internal Audit Service of the EC, the Internal Audit Capability of eu-LISA, OLAF, the European Ombudsman and the European Data Protection Supervisor.

The conservation period of DoI per category of data subjects is five years from the date of submission of the relevant DoI, extended with one year if duly justified.

Data subjects have a right to access their DoI and to update or correct it at any time. In case eu-LISA has knowledge of information that is not consistent with the declared interest, or in case of failure to submit a DoI, the data subject concerned are contacted with the purpose to update the DoI on the missing information. In case a breach of the rules procedure is opened, the data subject is notified without delay. The Data Protection Officer of eu-LISA (DPO) will ensure the compliance of these rules with the data protection legal framework. Data subjects also are entitled to have recourse at any time to eu-LISA's DPO (dpo@eulisa.europa.eu) or directly to the European Data Protection Supervisor (edps@edps.europa.eu) <http://www.edps.europa.eu>.

¹ For more information, the Privacy Statement can be found here: <https://eulisa.europa.eu/Activities/Data-Protection/privacy-notices>

² https://www.eulisa.europa.eu/AboutUs/DP/Documents/web_DPO_Register.pdf#zoom=300

Annex 2

ANNUAL PUBLIC STATEMENT OF COMMITMENT

Name: Silvia Michelini

Representing: European Commission - DG HOME

I hereby undertake to perform my duties in the public interest in accordance with the provisions of Article 29¹ of Regulation (EU) 2018/1726 of the European Parliament and of the Council of 14 November 2018 on the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice (eu-LISA), and amending Regulation (EC) 1987/2006 and Council Decision 2007/533/JHA and repealing Regulation (EU) 1077/2011² and to comply with the Rules of Procedure of the Agency³.

In particular, I am aware that I am obliged to complete and sign an Annual Statement, in which I commit to act in the public interest and to respect the confidential character of the deliberations of the Management Board and of the documents transmitted by the Agency, for the performance of my tasks in the Management Board.

In accordance with Article 24⁴ of the Rules of Procedure, I shall also declare any interests which might be considered prejudicial to my independence or which might interfere with my activities for the Agency overall and in relation to any particular items on the agenda of any meetings of the Management Board.

Done in Brussels, on 19/03/2026

SIGNATURE SIGNED IN ORIGINAL

¹ Article 29 of Regulation (EU) 2018/1726 reads: "Public interest: The members of the Management Board, the Executive Director, the Deputy Executive Director and the members of the Advisory Groups shall undertake to act in the public interest. For that purpose, they shall issue an annual, written, public statement of commitment, which shall be published on the Agency's website. The list of members of the Management Board and of members of the Advisory Groups shall be published on the Agency's website."

² OJ L 295, 21.11.2018, p. 99.

³ Decision of the Management Board No 2022-329 of 20.09.2022 on the Rules of Procedure of the European Union Agency for the Operational Management of Large-Scale IT Systems in the Area of Freedom, Security and Justice.

⁴ Rules of Procedure, Article 24: "Conflicts of Interest and Public Interest: 1. The Rules for the prevention and management of conflict of interest concerning the members of the Management Board and members of the Advisory Groups (Management Board Decision No 2022-006 as set in the document 2021-411) shall apply. 2. The members and observers of the Management Board, the Executive Director, the Deputy Executive Director and the members and observers of the Advisory Groups will issue, an annual written, public statement of commitment which shall be also published on the Agency's website as stipulated in Article 29 of the Regulation.