



Brussels, 23 November 2018

To whom it may concern,

I would like to submit a complaint regarding a possible breach of the EU Code of Conduct of the Transparency Register by the consultancy firm Hill+Knowlton International Belgium, with identification number 3183894853-03, hereafter H+K.

Based on the information provided by the online media EU Observer “Exposed; How Morocco lobbies EU for its Western Sahara claim” dated 23 November 2018<sup>1</sup>, it would appear that H+K may have contravened with several clauses of the EU Code of Conduct and I would like to call upon you to carefully scrutinize the matter.

According to the above-mentioned article, the consultancy firm H+K has direct ties to the EuroMedA Foundation, an NGO established under Belgian law.

Moreover, the article claims that H+K Strategies Chief Director Alain Berger co-founded EuroMedA and is currently its Secretary General. The offices of EuroMedA are also reportedly located in the offices of H+K.

This is particularly disturbing, due to the fact that the government of Morocco has been and possibly remains a leading client of H+K and that the NGO EuroMedA carries out its activities directly in relation to Morocco within the European Parliament, including public events therein. EuroMedA Foundation is not listed in the EU lobby register.

If confirmed, the work of EuroMedA appears to be directly related to the professional activities of H+K and hence, several clauses of the Code of Conduct might have been breached by H+K, including:

(a) by the possible failure to identify themselves and to declare their interests, objectives and aims they promote, by acting through the veil of an organisation which is not registered in the Lobby register, EuroMedA;

(b) by potentially seeking to obtain dishonestly information or decisions in relation to Morocco and Western Sahara through EuroMedA;

(g) by potentially inducing Members of the European Parliament (MEPs Pargneaux, Lalonde, Ries and Manescu) to contravene unwittingly to the rules and standards of behaviour applicable to them, through securing their presence on the Board of Administration of EuroMedA which might constitute a conflict of interest in relation to their parliamentary activity on files related to Morocco and Western Sahara.

Yours sincerely,

Florent Marcellesi, MEP

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<sup>1</sup> <https://euobserver.com/investigations/143426>