



Brussels, 12.11.2025
C(2025) 9032 final

DECISION OF THE EUROPEAN COMMISSION

on Former Commissioner Stella Kyriakides' envisaged post term of office professional activity as member of the Global Alliance for Women's Health Community of Champions

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THE EUROPEAN COMMISSION,

Having regard to the Treaty on European Union,

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

Having regard to the Treaty establishing the European Atomic Energy Community,

Having regard to the Commission Decision of 31 January 2018 (C(2018) 700 final) on a Code of Conduct for the Members of the European Commission, and in particular Article 11(3) thereof,

Considering that:

Whereas:

- 1) According to the second paragraph of Article 245 of the Treaty on the Functioning of the European Union, the Members of the Commission, when entering upon their duties, shall give a solemn undertaking that, both during and after their term of office, they will respect the obligations arising therefrom and, in particular, their duty to behave with integrity and discretion as regards the acceptance, after they have ceased to hold office, of certain appointments or benefits.
- 2) Article 339 of the Treaty on the Functioning of the European Union provides that the Members of the institutions of the Union shall be required, even after their duties have ceased, not to disclose information of any kind covered by the obligation of professional secrecy, in particular information about undertakings, their business relations or their cost components.
- 3) Article 11 of the Code of Conduct for the Members of the European Commission establishes a specific procedure for the assessment of planned professional activities which the Members or former Members of the Commission intend to take up after they have ceased to hold office. The Commission shall examine the information provided in order to determine whether the nature of the planned activity is compatible with Article 245 of the Treaty on the Functioning of the European Union. If the planned activity is related to the portfolio of the Member or former Member, the Commission shall decide only after having consulted the Independent Ethical Committee unless the planned activity falls within the exceptions foreseen in paragraph 3, second subparagraph, lit. (a) to (f).

- 4) Former Commissioner Kyriakides informed the Commission, on 3 September 2025, about her intention to accept a post term of office activity proposed to her by the World Economic Forum to become a *Champion* of the Global Alliance for Women's Health (otherwise said a member of the Global Alliance for Women's Health Community of Champions).
- 5) Former Commissioner Kyriakides' envisaged activity is related to her former Commission portfolio on 'Health and Food Safety'. The Independent Ethical Committee was therefore requested, on 16 September 2025, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 6) The Committee delivered its opinion on 28 October 2025. The Committee first established the general facts regarding the Global Alliance for Women's Health (in particular its activities, its partners, its governance, its link with the World Economic Forum and its funding), the precise scope of the Former Commissioner's envisaged activity, and the links between the Global Alliance for Women's Health and the World Economic Forum, on one side, and the European Commission, on the other side. The Committee then assessed the legal context applicable and drew its conclusions on the compatibility of the envisaged activity vis-à-vis the legal context.
- 7) The Committee noted that the Global Alliance for Women's Health is a multi-stakeholder global platform launched in 2024 in the context of the United Nations General Assembly and hosted by the World Economic Forum. The Committee added that the Global Alliance for Women's Health brings together more than 120 member organisations across public, private and philanthropic sectors. Its aim is at reshaping how women's health is researched, financed, innovated and advocated for, with a view to closing the women's health gap.
- 8) The Committee noted that the World Economic Forum is an international non-governmental organisation bringing together business, political, academic and other societal leaders to shape global, regional and industry agendas, describing itself as independent, impartial, not tied to special interests, as well as upholding high standards of governance and moral and intellectual integrity. The Committee underlined the World Economic Forum's broad membership, which includes large multinational companies.
- 9) The Committee underlined that the Global Alliance for Women's Health's activities focus on three areas: (1) Financing: unlocking investments and exploring innovative financing models to increase funding for women's health; (2) Science and Innovation: encouraging and supporting progress for women's health innovation and ensuring that innovation meets women's diverse needs, preferences and lifestyles; and (3) Shaping a new narrative for women's health and socialising critical data that illustrates the wide-ranging impact of healthy women.

- 10) The Committee noted that the Global Alliance for Women's Health interacts with global leaders from the public, private and international sectors, civil society and academia who are committed to improving women's health. Among the Global Alliance's multi-stakeholder partners, the Committee noted the Gates Foundation and the Ministry of Health of Brazil.
- 11) As regards the Global Alliance for Women's Health's governance, the Committee noted its link with the World Economic Forum, within which it is hosted. The Committee furthermore remarked that, at its outset, the Global Alliance for Women's Health was chaired by the Gates Foundation and the Ministry of Health of Brazil., presenting itself 'guided by an influential, multi-sector governing board' comprising world leaders representing diverse stakeholder groups ⁽¹⁾.
- 12) On the Global Alliance for Women's Health's funding, the Committee noted that its work is funded primarily through partner commitments from public, private and philanthropic entities. Organisations are invited to join and make public commitments and/or funding pledges. The Committee did not find a publicly available breakdown of the funding of the Alliance, noting nevertheless that, around its launch, the Global Alliance announced USD 55 million in commitments, this sum including USD 3 million from the Gates Foundation ⁽²⁾.
- 13) On Former Commissioner Kyriakides' envisaged activity as *Champion* of the Global Alliance for Women's Health, the Committee noted that the *Champions* (31 *Champions* for the period August 2024-July 2025) are leaders and innovators, expected to advocate prioritising women's health worldwide. The Committee noted that the role committed to the *Champions* includes: (1) elevating the work of the Alliance in one's networks (through participation or speaking roles at events, public addresses, online posts, etc.); (2) providing guidance to the Alliance on the latest trends, developments and potential opportunities that might be relevant to women's health and the work of the Alliance; (3) speaking as a panellist at relevant events, including those hosted by the Alliance, and/or deliver expert briefings either in person or virtually at the World Economic Forum's studios; (4) contributing thought leadership and knowledge by authoring/ co-authoring Agenda blog posts on women's health issues and/or the work of the alliance; (5) acting as mentors to a young generation of women who are a part of the Alliance network and are interested in women's and global health; (6) Contributing to at least one of the work streams of the Alliance (optional, depending on relevance and capacity). *Champions* commit to attending two annual meetings in Geneva and New York and their activity is presented as voluntary, without any reference to a remuneration.

⁽¹⁾ In the context of the Global Alliance's governance, the Independent Ethical Committee observed that the World Economic Forum's governance structure includes a Board of Trustees, a Managing Board, Managing Directors and an Executive Committee.

⁽²⁾ In the context of Global Alliance's funding, the Independent Ethical Committee noted that the World Economic Forum's funding comes primarily from partnerships and memberships (organisations paying to join and access its events) but also from grants received from public institutions.

- 14) The Committee noted that the Global Alliance for Women's Health is not registered in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission, did not find evidence of a formal partnership between the Global Alliance for Women's Health and the European Commission and could not find evidence of advocacy of the Global Alliance for Women's Health or its *Champions* towards the Commission.
- 15) The Committee noted nevertheless that the European Commission has programmes focusing on women's health research and innovation and mentioned the European Union's investment over €2 billion in more than 1 000 projects focused on women's health under Horizon 2020 and Horizon Europe. The Committee furthermore noted that the European Union is also actively funding projects to close gender gaps in healthcare, enhance disease prevention, and develop targeted treatments for women.
- 16) By contrast, the Committee observed that the World Economic Forum is registered in the Transparency Register, quoting that it '*supports the European Commission's strategic objectives, particularly in the areas of Europe's competitiveness, including the twin digital and green and energy transition*' and noting that it has frequent meetings with Commissioners, Members of Cabinet and senior managers of the European Commission.
- 17) The Committee then recalled the legal framework applicable to the assessment of the post term of office activities of former Members of the Commission and eventually concluded on the restrictions and conditions deemed necessary in order to ensure the compatibility of Former Commissioner Kyriakides's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 18) As a preliminary consideration, the Committee noted that former Members of the Commission have a right to engage in work and to pursue a freely chosen or accepted occupation after the term of their office. This right needs to be balanced with the obligations set out in Article 245 TFEU and the Code of Conduct for the Members of the European Commission, which develops these obligations in more detail.
- 19) On the substance, the Committee noted that Former Commissioner Kyriakides's envisaged activity is closely linked to her former 'Health and Food Safety' portfolio, her role possibly including many possible tasks, and in particular advocacy with public organisations. The Committee furthermore underlined that the World Economic Forum may create opportunities for contact between *Champions* of the Global Alliance for Women's Health and members of international organisations, as well as the European Commission.
- 20) The Committee further observed that the objectives of the Global Alliance for Women's Health and Former Commissioner Kyriakides's involvement are not for profit and pursue aims that are aligned with those of the European Union.

- 21) This led the Committee to consider that Former Commissioner Kyriakides's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union as long as she does not engage in advocacy towards the European Commission.
- 22) The Committee therefore recommended that the Commission recalls that Former Commissioner Kyriakides remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying³ Members or staff of the European Commission on behalf of the Global Alliance for Women's Health on matters for which she was responsible within her portfolio for a period of two years after ceasing to hold office, i.e. until 30 November 2026, nonetheless knowing that the Former Commissioner's participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff is not covered under this exclusion.
- 23) The Committee also considered that the Commission decision should recall the confidentiality obligation laid down in Article 339 TFEU, as well as the general obligations set out in Article 11(1) of the Code, in conjunction with Article 5. These articles provide that former Members of the Commission continue to be bound by the duty of integrity and discretion as well as by the duties of collegiality and discretion with respect to the Commission's decisions and activities during their term of office.
- 24) The Committee furthermore considered that the Commission decision should recall that, according to Article 13(2) of the Code of Conduct, former Members of the Commission shall inform the President in a timely manner if they have doubts with regard to the application of the Code before acting on the matter relating to which the doubts arise.
- 25) Finally, the Committee considered it important that both Former Commissioner Kyriakides and the Alliance are fully aware of the obligations of former Members of the Commission, which continue to apply after their term of office. The Committee therefore recommended that the Commission decision includes a condition that Former Commissioner Kyriakides shares a copy of the Commission Decision with the Alliance and confirms this to the Commission. This obligation aims at ensuring full transparency of the applicable obligations, conditions and restrictions and at providing the Commission with an additional assurance that situations which could create a risk

(³) The term 'lobbying' means any activity carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission as set out in Article 3 of Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register; it includes indirect lobbying on behalf of clients through indirect measures with the same objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission such as organising or participating in meetings, conferences, events or consultation or hearings, organising communication campaigns or the preparation of position papers and applies independently of the location; it also covers any activity with a view to obtaining EU funding.

for the respect of those obligations will be avoided or addressed by both Former Commissioner Kyriakides and the Global Alliance for Women's Health.

- 26) The Commission has taken the Committee's opinion into consideration and shares its conclusions, considering nevertheless that the interdiction of lobbying should encompass both the possible lobbying in favour of the Global Alliance for Women's Health, in favour of its members and in favour of all the parties represented in the World Economic Forum. In addition the Commission has considered that this interdiction should not only concern the Commission, but be extended to also cover the European Centre for Disease Prevention and Control and the European Medicines Agency.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Kyriakides' envisaged post term of office activity as *Champion* of the Global Alliance for Women's Health (otherwise said as member of the Global Alliance for Women's Health Community of Champions) is compatible with Article 245 of the Treaty on the Functioning of the European Union, subject to the respect of the conditions and restrictions set out in Article 2.

Article 2

- a) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Commissioner Kyriakides shall refrain from disclosing or using information of the kind covered by the obligation of professional secrecy that she obtained as Member of the Commission, in particular information about undertakings, their business relations or their cost components;
- b) In line with Article 11(1) of the Code of Conduct for the Members of the Commission, in conjunction with Article 5 of the Code, Former Commissioner Kyriakides remains bound by the duties of collegiality and discretion, with respect to the Commission's decisions and activities during her term of office. She shall not disclose what was said at meetings of the Commission and shall apply a high sense of discretion with regard to the use of information and insights that she obtained during her mandate in relation to the performance of her portfolio obligations and, in general, in relation to her duties as Member of the Commission;
- c) In line with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Commissioner Kyriakides shall refrain from lobbying the Commission its Members, and its Staff, as well as the European Centre for Disease Prevention and Control and the European Medicines Agency on behalf of the Global Alliance for

Women's Health, of its members and of the parties represented in the World Economic Forum, on matters for which she was responsible for withing her portfolio, for a period of two years after ceasing to hold office, i.e. until 30 November 2026. It is recalled in this regard that the term 'lobbying' means any activity carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission as set out in Article 3 of the Interinstitutional Agreement of 20 May 2021 between the European Parliament, the Council of the European Union and the European Commission on a mandatory transparency register; it includes indirect lobbying on behalf of clients through indirect measures with the same objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of the Commission, such as organising or participating in meetings, conferences, events or consultation or hearings, organising communication campaigns or the preparation of positions papers, and applies independently of the location; it also covers any activity with a view to obtaining EU fundings. This prohibition does not affect a possible participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.

- d) Former Commissioner Kyriakides shall share a copy of the Commission Decision with the Global Alliance for Women's Health and inform the Secretary-General of the Commission thereof.
- e) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former Commissioner Kyriakides shall inform the President of the Commission, in a timely manner, if and when she has a doubt with regard to the application of the present Decision or the Code of Conduct in general before acting on the matter in relation to which the doubt arises.

Done at Brussels, on 12 November 2025.

The President
Ursula von der Leyen