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DECISION OF THE EUROPEAN COMMISSION

on Former Commissioner Jutta Urpilainen's envisaged post term of office professional activity as member of the European Leadership Network

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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 Urpilainen informed the Commission, on 29 September 2025, of her likely intention to join the European Leadership Network, more precisely as member of the network of experts acting to reduce existential nuclear risk and build greater mutual security. She confirmed her intention on 22 October 2025, underlining that she had not been involved with the European Leadership Network during her mandate, this network being unrelated to her former Commission portfolio on International Partnerships.
- 5) The Former Commissioner shared with the Commission the material attached to the invitation sent to her by European Leadership Network. The Commission gathered additional information on the European Leadership Network through its website and other open sources, including the Transparency Register of the European Commission, the European Parliament, and the Council of the European Union, notably on its origins, its composition, its activities, its governance, its partners and its funding.
- 6) Established in 2011 and based in London, the European Leadership Network was inspired by the vision of a more cooperative Europe and emerged in the context of Former US President Barack Obama's 2009 Prague speech, which called for progressive multilateral disarmament. In view of its growing challenges, the European Leadership Network strives to diversify, expand and increase its impact.
- 7) The European Leadership Network presents itself as an independent, non-partisan pan-European organisation, gathering a comprehensive network of over 450 European political, military and diplomatic leaders committed to promoting a collaborative Europe and addressing urgent foreign, defence, and security policy issues.
- 8) The European Leadership Network underlines that it brings together senior and emerging leaders from across Europe and neighbouring region, including Russia, Turkey and the Caucasus region ⁽¹⁾.
- 9) European Leadership Network's membership is drawn from a wide spectrum: former heads of state, foreign and defence ministers, senior ambassadors, high-level diplomats, business executives, parliamentarians, policy specialists and journalists.
- 10) European Leadership Network's activities combine research, policy engagement and high-level discussions. The organisation produces policy-oriented research, analyses and publications addressing European and transatlantic security, with a particular emphasis on enhancing EU-NATO cooperation, strengthening transatlantic burden-sharing and promoting European cohesion on defence and strategic stability. Additionally, the European Leadership Network is a member of the EU Non-Proliferation and Disarmament Consortium.

⁽¹⁾ The material attached to Former Commissioner Urpilainen's notification notes that, on 26 March 2025, the membership of Russian citizens based in Russia was suspended, alongside select Belarusians, following the Russian authorities' designation of the European Leadership Network as 'undesirable'.

- 11) The European Leadership Network also serves as a platform for informal diplomacy, offering space for dialogue between Western and Eastern European actors, as well as between Europe and other regions. Through its action, the European Leadership Network seeks to influence policy, improve dialogue and strengthen cooperation between European states and their international partners, with the overarching goal of contributing to a safer and more stable world.
- 12) The European Leadership Network is governed by an Executive Board which is responsible for setting the organisation's strategic direction, overseeing its operations, and guiding its long-term development. Beneath the board, the senior management team (staff) carries out the organisation's daily activities, including research, policy engagement, event coordination and external relations. An Advisory Board composed of former policymakers, diplomats, academics, and business leaders from across the Euro-Atlantic region, contributes to shaping the European Leadership Network's research agenda, offering strategic advice and facilitating high-level access to decision-makers and key stakeholders.
- 13) Partners of the European Leadership Network include the Open Society Foundations as well as think tanks and organisations based in different European countries.
- 14) As concerns its funding, the European Leadership Network underlines that, according to its strategic vision, the organisation aims to raise funds and diversify its funding sources to make the Network strong, agile, sustainable and independent. The European Leadership Network states that it does not directly receive financial support from governments yet noting that some of its programmes have been co-sponsored by government ministries in countries such as Germany, Norway and United-Kingdom. Important financial support is also brought through grants from private philanthropies and foundations (notably the Rockefeller Brothers Fund, the Joseph Rowntree Charitable Trust etc). In addition, the European Leadership Network's website invites donators to help fund its research.
- 15) The European Leadership Network is registered with the Transparency Register of the European Commission, the European Parliament, and the Council of the European Union. According to its registration, the organisation operates as a think tank and research institution with non-commercial interests, with a primary objective of advancing research and education in the fields of political, security, defence, economic and energy challenges across Europe. Furthermore, the organisation promotes international conflict resolution, reconciliation and social cohesion for the public benefit. The European Leadership Network's registration also indicates that its activities are primarily focused on the work of the European External Action Service and the European Commission in the areas of external relations and defence, particularly within the EU's Eastern Neighbourhood.
- 16) According to the Transparency Register, the European Leadership Network is primarily funded through grants. In its most recent financial year (March 2023 to May

2024), the organisation reported a total budget of €2,054,891, with significant contributions from the UK Foreign, Commonwealth and Development Office (€563,857) and the Carnegie Corporation of New York (€456,232).

- 17) The Commission has assessed the envisaged activity and finds that it is not linked to Former Commissioner Urpilainen's former portfolio responsibilities as Commissioner in charge of International Partnerships.
- 18) On substance, the notified activity does not present any risk of incompatibility with Former Commissioner Urpilainen's former functions as Member of the Commission or with the interests of the Commission, provided Former Commissioner Urpilainen abides by all the relevant provisions of the Treaty on the Functioning of the European Union, namely Article 339, and of the Code of Conduct for the Members of the Commission, in particular the duties of collegiality and discretion with respect to the Commission's decisions and activities during her term of office, as provided for by Article 11(1) of the Code in conjunction with Article 5 and the interdiction of lobbying the Members of the Commission or their Staff, as set out in Article 11(4) of the Code.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Urpilainen's envisaged post term of office activity as member of the European Leadership Network 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

- 1) In accordance with Article 339 of the Treaty on the Functioning of the European Union, Former Commissioner Urpilainen 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;
- 2) 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 Urpilainen 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;

- 3) In line with Article 11(4) of the Code of Conduct for the Members of the Commission, Former Commissioner Urpilainen shall refrain from lobbying the Commission on behalf of the European Leadership Network on matters for which she was responsible within her former Commission portfolio, for a period of two years after ceasing to hold office, i.e. until 30 November 2026. This 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;
- 4) In line with Article 13(2) of the Code of Conduct for the Members of the Commission, Former Commissioner Urpilainen 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 19 November 2025.

The President
Ursula von der Leyen