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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 'Global Women Leaders Voices for Change and Inclusion'

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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 15 May 2025, about her intention to join ‘Global Women Leaders Voices for Change and Inclusion’. Following a request for clarification from the Commission, she confirmed, on 23 May 2025, that she intended to participate in the activities carried out by this organisation.
- 5) Former Commissioner Urpilainen enclosed to her notification the e-mail and letter sent to her by the President of ‘Global Women Leaders Voices for Change and Inclusion’, explaining that this network had been established in March 2019, aiming to promote women rights and multilateralism. More precisely, ‘Global Women Leaders Voices for Change and Inclusion’ focusses on two fundamental areas: increasing gender equality and the space for women to contribute to society and strengthening multilateralism as a fundamental tool to address global challenges.
- 6) Former Commissioner Urpilainen’s envisaged activity is related to her former Commission portfolio on ‘International Partnerships’. The Independent Ethical Committee was therefore requested, on 5 June 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.
- 7) The Committee delivered its opinion on 7 July 2025. The Committee first established the facts regarding the nature of ‘Global Women Leaders Voices for Change and Inclusion’, its activities, its governance structure, its partners, its funding, the precise scope of Former Commissioner Urpilainen envisaged position and the link with the European Commission.
- 8) The Committee noted that ‘Global Women Leaders Voices for Change and Inclusion’ is a global network founded in 2019, gathering 75 women leaders from 43 countries who work to build a gender-equal international system rooted in sustainable development, peace, security, and human rights. As of 2022, the organisation has been officially established as a non-governmental organisation with its headquarters in Madrid. The Committee noted also that ‘Global Women Leaders Voices for Change and Inclusion’ leverages the experience and voices of its members to influence global decision-makers, shape public opinion, and transform multilateral systems.
- 9) The Committee noted that the activities carried out by ‘Global Women Leaders Voices for Change and Inclusion’ include advocacy, policy influence, education and networking. ‘Global Women Leaders Voices for Change and Inclusion’ advocates for gender parity in international institutions through campaigns like ‘*Rotation for Equality*’ (pushing for gender-balanced leadership rotations across international institutions) and ‘*Madam SG*’ (calling for a woman UN Secretary General). It also issues open letters, policy statements, and reports. ‘Global Women Leaders Voices for Change and Inclusion’ also participates actively in ‘*Financing for Development (FfD4)*’ conferences to promote gender equitable finance and multilateral reform.

- 10) The Committee noted that the governance structure of ‘Global Women Leaders Voices for Change and Inclusion’ includes a board composed of its founders, an executive director, and an operational team.
- 11) The Committee furthermore noted that the organisation’s official website identifies 22 partner organisations that collaborate on promoting gender equality at the global level, therein not including the European Commission.
- 12) On the funding of ‘Global Women Leaders Voices for Change and Inclusion,’ the Committee underlined that, according to its latest financial statement, ‘Global Women Leaders Voices for Change and Inclusion’ received €1,233,883.87 as operating subsidies for the year 2024. The Committee noted that ‘Global Women Leaders Voices for Change and Inclusion’ emphasises diverse and independent funding sources to preserve integrity and autonomy, yet adding that its webpage does not list its donors. The Committee indicated that the Gates Foundation had reported having granted USD 400,000 to ‘Global Women Leaders Voices for Change and Inclusion,’ *‘to strengthen gender and women in leadership in multilateral engagements’* in August 2024.
- 13) As regards Former Commissioner Urpilainen’s non-remunerated envisaged position, and based on public information, the Committee observed that the role of member of this network might include four distinct aspects, namely: (1) Advocacy: leading campaigns and public messaging; (2) Policy influence: providing expert input and recommendations; (3) Education: designing and delivering educational offerings on gender-related topics; (4) Networking: creating networks to foster influence and coordinated action.
- 14) The Committee finally noted that ‘Global Women Leaders Voices for Change and Inclusion’ is not registered in the Transparency Register of the European Parliament, the Council of the European Union and the European Commission, and that there is no established institutional connection between the European Commission and ‘Global Women Leaders Voices for Change and Inclusion Voices’.
- 15) The Committee 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 Urpilainen’s envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.
- 16) 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.

- 17) On the substance of the notified activity, the Committee first underlined that the work of ‘Global Women Leaders Voices for Change and Inclusion’ is linked to Former Commissioner Urpilainen’s portfolio on ‘International Partnerships’. The Committee furthermore noted that, as a member of this network, Former Commissioner Urpilainen will possibly be involved in activities of advocacy, policy influence, education or networking. The Committee added that these activities are not related to the acquisition or distribution of funds.
- 18) Moreover, the Committee noted that the objectives of ‘Global Women Leaders Voices for Change and Inclusion’ in gender equality and inclusive governance appear to be broadly aligned with those of the European Commission.
- 19) The Committee considered therefore that Former Commissioner Urpilainen’s envisaged activity does not represent a risk with regard to the interests of the Commission. In addition, the Committee did not identify any legal or other impediments which would lead to prevent Former Commissioner Urpilainen from accepting this activity, as long as Former Commissioner Urpilainen respects the obligations set out in the Treaties and the Code of Conduct for the Members of the European Commission.
- 20) The Committee suggested nevertheless that the Commission recalls that Former Commissioner Urpilainen remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying ⁽¹⁾ Members or staff of the European Commission on behalf of ‘Global Women Leaders Voices for Change and Inclusion’ on matters for which she was responsible within her portfolio, for a period of two years after ceasing to hold office. The Committee noted that that this restriction 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.
- 21) The Committee also considered that the Commission’s decision should also recall that Former Commissioner Urpilainen must strictly respect Article 339 of the Treaty on the Functioning of the European Union, which entails that she is required, even after her term of office, to refrain from disclosing information of the kind covered by the obligation of professional secrecy, in particular information about undertakings, their business relations or their cost components.

⁽¹⁾ 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.

- 22) The Committee furthermore considered that the Commission's decision should recall that Former Commissioner Urpilainen remains bound by the duties of collegiality and discretion, as laid down in Article 5 of the Code of Conduct for the Members of the European Commission, with respect to the Commission's decisions and activities during her term of office. The Committee underlined that Former Commissioner Urpilainen must not disclose anything which was said at meetings of the Commission or call into question decisions taken by the Commission during her mandate.
- 23) Finally, the Committee considered that the Commission decision should recall that Former Commissioner Urpilainen must show in general a high sense of discretion with regard to the use of information and insights that she obtained in the performance of her duties.
- 24) On the basis of the above-mentioned considerations, the Committee concluded that Former Commissioner Urpilainen's envisaged activity would be compatible with Article 245 of the Treaty on the Functioning of the European Union.
- 25) The Commission has considered the Committee's opinion and shares its conclusions.

HAS DECIDED AS FOLLOWS:

Article 1

Former Commissioner Urpilainen's envisaged post term of office activity as member of 'Global Women Leaders Voices for Change and Inclusion' 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 Global Women Leaders Voices for Change and Inclusion, and/or in the interest of the entities who support the Global Women Leaders Voices for Change and Inclusion 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 16 July 2025

The President
Ursula von der Leyen