

Opinion
of the
Independent Ethical Committee
established
by the European Commission
20 February 2026

Subject: Request for an opinion on Former Commissioner Jutta Urpilainen’s envisaged post-term of office activity as Distinguished Non-Resident Fellow in the Center for Global Development

On request of the President of the European Commission, the Independent Ethical Committee, composed of Ms Elisabeth Morin-Chartier, Ms Alexandra Prechal and Ms Gertrud Ingestad, delivers the present opinion:

Procedure

1. On 15 December 2025, Former Commissioner Urpilainen informed the Commission about her intention to accept a post-term of office Distinguished Non-Resident Fellowship in the Center for Global Development (hereafter ‘CGD’).
2. On 4 February 2026, the Secretary-General of the European Commission asked the Committee, on behalf of the President of the Commission, to deliver an opinion on the compatibility of this envisaged post-term of office activity with Article 245 of the Treaty on the Functioning of the European Union (TFEU).

Facts

3. According to the information provided by Former Commissioner Urpilainen in her notification, she would like to be appointed as a Distinguished Non-Resident Fellow in the Center for Global Development.
4. Distinguished Non-Resident Fellows engage with CGD in various ways, including by participating in private roundtables, speaking at public CGD events, and authoring op-eds or blog posts on key developments in CGD’s research areas. They may also contribute to peer reviews of research papers and publications.

Objectives of CGD

5. According to the information provided by Former Commissioner Urpilainen, CGD is a nonpartisan, independent think tank with offices in Washington, DC, and London, UK.
6. The organisation works to reduce global poverty and improve lives through innovative economic research that informs better policy and practice. CGD's work is nonpartisan, and its recommendations are not influenced by its funders.
7. Through analysis and practical policy solutions, CGD focuses on the issues and institutions most critical to global development. The organisation generates new ideas, publishes independent and actionable policy proposals, and actively engages in outreach, including convening events and participating in bilateral meetings related to its research.

Governance of CGD

8. CGD's President is Ms Rachel Glennerster.
9. CGD's Board of Directors is composed of prominent individuals from the public and private sectors. The Board meets twice a year to review the Center's activities and finances and to provide advice and counsel to the President.
10. The Executive Committee meets quarterly to provide ongoing oversight. The Board is responsible for the overall control of the Center's property, funds, and affairs.

Funding of CGD

11. CGD is an independent, nonpartisan "think-and-do tank". According to their website, the think tank does not accept funding that seeks to impose limits or restrictions on the independence of its research, findings, conclusions, or resulting publications.
12. The Center publishes and regularly updates a list of active and historic grants over \$30,000 USD.

Links between CGD and the European Commission

13. CGD is registered in the EU Transparency Register.
14. According to the information in the register, CGD Europe has received the following EU grant for the current financial year: Neighbourhood, Development and International Cooperation Instrument – Global Europe (NDICI): €469,777 and its main sources of funding for 2024 were donations and grants.

Former Commissioner Urpilainen's envisaged position

15. According to the information provided by Former Commissioner Urpilainen in her notification, the activity would be related to her former Commission portfolio and responsibilities in the area of International Partnerships and would have an academic nature.
16. The position would involve policy-relevant engagement alongside research-oriented and evidence-based contributions, consistent with CGD's role at the intersection of academic analysis and policy practice.
17. The role will be flexible. The only formal requirement is that Distinguished Non-Resident Fellows engage with CGD at least once per year. This can take various forms, such as participating in private roundtables, speaking at public CGD events, or authoring op-eds or blog posts on key developments in the sector. From time to time Distinguished Non-Resident Fellows are invited to take part in peer reviews of research papers and publications, but this is entirely optional.
18. According to the notification, this is a non-remunerated position, involving no salary, consultancy fee, or honorarium. The CGD will reimburse all travel and accommodation expenses for CGD-related trips. The chair and the commissioners participate on a voluntary basis, in keeping with the public-service and non-profit character of the initiative.

Legal context

19. Article 245 TFEU provides:

The Members of the Commission shall refrain from any action incompatible with their duties. Member States shall respect their independence and shall not seek to influence them in the performance of their tasks.

The Members of the Commission may not, during their term of office, engage in any other occupation, whether gainful or not. When entering upon their duties they 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. In the event of any breach of these obligations, the Court of Justice may, on application by the Council acting by a simple majority or the Commission, rule that the Member concerned be, according to the circumstances, either compulsorily retired in accordance with Article 247 or deprived of his right to a pension or other benefits in its stead.

20. Article 15(1) and (2) of the Charter of Fundamental Rights of the European Union provides:

1. Everyone has the right to engage in work and to pursue a freely chosen or accepted occupation.

2. Every citizen of the Union has the freedom to seek employment, to work, to exercise the right of establishment and to provide services in any Member State.

21. Article 2(7) of the Code of Conduct for the Members of the European Commission (hereafter the ‘Code of Conduct’) provides:

7. Former Members shall respect the obligations arising from their duties that continue to have an effect after their term, in particular the duty to behave with integrity and discretion as regards the acceptance of certain appointments or benefits in line with Article 245 of the Treaty on the Functioning of the European Union, and the obligations specified in this Code of Conduct.

22. Article 5 of the Code of Conduct provides:

1. Members shall comply with the duty of loyalty towards the Commission and discretion in discharging their duties. They shall act and express themselves with the restraint that their office requires.

2. Members shall refrain from disclosing what is said at meetings of the Commission.

3. Without prejudice to the disciplinary provisions applicable to officials and other agents, Members are responsible for the proper handling and any external transmission by members of their Cabinets of classified documents, of sensitive information or of confidential documents submitted to the College for adoption or information.

4. Members shall not make any comment that would call into question a decision taken by the Commission or which may harm the Commission's reputation.

23. Article 11 of the Code of Conduct provides:

1. After ceasing to hold office, former Members shall continue to be bound by their duty of integrity and discretion pursuant to Article 245 of the Treaty on the Functioning of the European Union. They shall continue to be bound by the duties of collegiality and discretion, as laid down in Article 5, with respect to the Commission's decisions and activities during their term of office.

2. Former Members shall inform the Commission with a minimum of two months' notice of their intention to engage in a professional activity during a period of two years after they have ceased to hold office. For the purposes of the present Code, ‘professional activity’ means any professional activity, whether gainful or not, other than any unpaid activity which has no link with the activities of the European Union and which does not give rise to lobbying or advocacy vis-à-vis the Commission and its services such as:

- (a) charitable or humanitarian activities;*
- (b) activities deriving from political, trade unionist and/or philosophical or religious convictions;*
- (c) cultural activities;*
- (d) the mere management of assets or holdings or personal or family fortune, in a private capacity;*
- (e) or comparable activities.*

3. 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, and if the planned activity is related to the portfolio of the former Member, it shall decide only after having consulted the Independent Ethical Committee.

Without prejudice to the possibility for the President to seek its opinion in cases of doubt, the Independent Ethical Committee does not need to be consulted where former Members intend to:

- (a) continue to serve the European interest in an Institution or Body of the European Union;*
- (b) take up functions in the national civil service of a Member State (at national, regional or local level)*
- (c) engage with international organisations or other international bodies dealing with public interests and in which either the EU or one or several of its Member States are represented;*
- (d) engage in academic activities;*
- (e) engage in one-off activities for a short duration (1 or 2 working days);*
- (f) accept honorary appointments.*

4. Former Members shall not lobby Members or their staff on behalf of their own business, that of their employer or client, on matters for which they were responsible within their portfolio for a period of two years after ceasing to hold office.

5. In the case of a former President, the periods set out in paragraphs (2) and (4) shall be three years.

6. The duties set out in paragraphs (2) and (4) shall not apply where the former Member is engaging in public office.

7. Decisions taken under paragraph (3) determining compatibility with Article 245 of the Treaty on the Functioning of the European Union and related opinions of the Independent Ethical Committee shall be made public with due consideration to the protection of personal data.

Opinion

24. The Committee notes that 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, which develops these obligations in more detail.
25. The Committee first notes that the envisaged position of Former Commissioner Urpilainen would be linked to her former portfolio ‘International Partnerships’. Among her responsibilities as Former Commissioner, she was tasked with ‘building inclusive and equitable partnerships to reduce global poverty and support sustainable development’.
26. As Distinguished Non-Resident Fellow of CGD, Former Commissioner Urpilainen would contribute to the work of the organisation with policy-relevant engagement alongside research-oriented and evidence-based contributions, without being a full-time, on-site employee.
27. This role may involve advocacy to disseminate the recommendations of the think tank.
28. The activity is not related to the acquisition or distribution of funds and does not involve any direct activities of lobbying the EU institutions.
29. The Committee notes that the objectives of CGD are not for profit and aim to achieve objectives that are widely shared globally, including by the European Union.
30. The Committee therefore considers that Former Commissioner Urpilainen’s envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union.
31. The Committee concludes that, in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union. The activity does not warrant imposing restrictions that go beyond the respect of the obligations laid down in the Treaties and the Code of Conduct.
32. The Commission might however wish to recall that Former Commissioner Urpilainen’s 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

⁽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

on behalf of CGD on matters for which she was responsible within her portfolio for a period of two years after ceasing to hold office. This does not affect a participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.

33. The decision should also recall the confidentiality obligation laid down in Article 339 of the Treaty on the Functioning of the European Union, 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.
34. Finally, the decision should also 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 this Code before acting on the matter relating to which the doubts arise.

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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.