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DECISION OF THE EUROPEAN COMMISSION

**on Former Commissioner Jutta Urpilainen's envisaged post-term of office activity as
Distinguished Non-Resident Fellow in the Center for Global Development**

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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,

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 December 2025, about her intention to accept a post term of office Distinguished Non-Resident Fellowship with the Center for Global Development. She underlined that her envisaged activity will not be remunerated, although her related travel and accommodation expenses will be reimbursed.
- 5) Additional information shared by Former Commissioner Urpilainen with the Commission established the link between this envisaged activity and her former portfolio responsibilities for ‘International Partnerships. The Independent Ethical Committee was therefore requested, on 4 February 2026, 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 20 February 2026. The Committee first established the general facts regarding the Center for Global Development (in particular its nature, its activities, its governance and its funding), the precise scope of Former Commissioner Urpilainen’s envisaged activity, and the links between the Center for Global Development and the European Commission. 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 according to the information provided by Former Commissioner Urpilainen, the Center for Global Development is a non-partisan, independent think tank with offices in Washington and London.
- 8) The organisation works to reduce global poverty and improve lives through innovative economic research that informs better policy and practice. Through analysis and practical policy solutions, the Center for Global Development 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. Its recommendations are not influenced by its funders.
- 9) As regards the Center for Global Development’s governance structure, the Committee noted that its 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 (currently Ms Rachel Glennerster). 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.
- 10) As regards funding, the Committee noted that according to its website, the Center for Global Development does not accept funding that seeks to impose limits or restrictions on the independence of its research, findings, conclusions, or resulting publications.

The Center publishes and regularly updates a list of active and historic grants over 30,000 USD. Its main sources of funding for 2024 were donations and grants ⁽¹⁾.

- 11) As regards the precise scope of Former Commissioner Urpilainen,'s envisaged activity, the Committee noted that according to the information provided in her notification, the activity will have an academic nature and will be related to her former Commission portfolio on 'International Partnerships'.
- 12) The position will involve policy-relevant engagement alongside research-oriented and evidence-based contributions, consistent with the Center for Global Development's role at the intersection of academic analysis and policy practice.
- 13) The assignment proposed is flexible and will be shaped in detail at a later stage. The only formal requirement is that Distinguished Non-Resident Fellows engage with the Center for Global Development at least once per year. This can take various forms, such as participating in private roundtables, speaking at public events organised by the Center for Global Development, or authoring op-eds or blog posts on key developments in the sector. The assignment will also include occasional invitations to take part in peer reviews of research papers and publications.
- 14) The Committee noted that the Center for Global Development is registered in the EU Transparency Register ⁽²⁾. According to the information in the Register, the Center for Global Development has received a grant from the EU budget (Neighbourhood, Development and International Cooperation Instrument – Global Europe - NDICI) for the current financial year, amounting to 469,777 EUR.
- 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.
- 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) The Committee underlined that Former Commissioner Urpilainen's envisaged position will be linked to her former portfolio 'International Partnerships', knowing that among her Commission portfolio responsibilities, she was tasked with 'building inclusive and equitable partnerships to reduce global poverty and support sustainable development'.
- 18) As a Distinguished Non-Resident Fellow of the Center for Global Development, Former Commissioner Urpilainen will be requested to contribute to the work of the

⁽¹⁾ Full list of funders available under <https://www.cgdev.org/funding>.

⁽²⁾ Under number 370200435629-58.

organisation with policy-relevant engagement, alongside research-oriented and evidence-based contributions, without being a full-time, on-site employee.

- 19) The Committee noted that this role may involve advocacy to disseminate the recommendations of the Center for Global Development, while underlining that the activity is not related to the acquisition or distribution of funds and does not involve any direct activities of lobbying the EU institutions.
- 20) The Committee finally noted that the objectives of the Center for Global Development are not for profit and aim to achieve objectives that are widely shared globally, including by the European Union.
- 21) The Committee therefore considered that Former Commissioner Urpilainen's envisaged activity does not represent a risk with regard to the interests of the Commission and the European Union.
- 22) The Committee concluded that in its view, this activity is compatible with Article 245 of the Treaty on the Functioning of the European Union without warranting restrictions that go beyond the respect of the obligations laid down in the Treaties and the Code of Conduct.
- 23) The Committee nevertheless considered that the Commission might wish to recall that Former Commissioner Urpilainen remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying ⁽³⁾ Members or staff of the European Commission on behalf of the Center for Global Development, 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 participation in public events or general exchanges of, and on, publicly available information with Members of the European Commission or its staff.
- 24) The Committee furthermore noted that 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.

⁽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.

- 25) Finally, in the Committee's opinion, the Commission's decision should also recall that according to Article 13(2) of the Code of Conduct for the Members of the European Commission, 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.
- 26) 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 Distinguished Non-Resident Fellowship with the Center for Global Development 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 Center for Global Development 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 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 25 March 2026.

The President
Ursula von der Leyen