



Strasbourg, 1.4.2025  
C(2025) 9011 final

## **DECISION OF THE EUROPEAN COMMISSION**

**on Former Commissioner Jutta Urpilainen's envisaged post term-of-office professional activity as member of the Africa-Europe Women Leaders Network**

## **DECISION OF THE EUROPEAN COMMISSION**

### **on Former Commissioner Jutta Urpilainen's envisaged post term-of-office professional activity as member of the Africa-Europe Women Leaders Network**

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) With her letter of 25 November 2024, Former Commissioner Urpilainen notified the Commission of her intention to engage in a non-remunerated position as member of the Africa-Europe Women Leaders Network, committing thereby to participate in and contribute to this Network's meetings twice a year.
- 5) Former Commissioner Urpilainen explained that the Africa-Europe Women Leaders Network brings together leading personalities from neighbouring continents, Africa and Europe, to transform dialogue into action on the most pressing issues, from job creation to improved healthcare systems and tackling the climate emergency. It is chaired by the Honorary Presidents of the Africa-Europe Foundation: Ms Ellen Johnson Sirleaf, former President of Liberia, and Ms Mary Robinson, former President of Ireland.
- 6) The Africa-Europe Women Leaders Network aims at unlocking new opportunities for action through an enhanced Africa-Europe partnership. The Network meets in person at least twice a year for a public advocacy push, also meeting on average once every two months for working meetings, allowing informal, frank and trusted discussions across critical areas of inter-regional dialogue. Under the framework of the Africa-Europe Women Leaders Network, regular exchanges take place, directly connected to the work of the Africa-Europe Foundation Strategy and Working Groups, including on Health, Agriculture, Energy, Oceans, Carbon Markets, Adaptation, Illicit Financial Flows and Digital. Youth, Gender and Digital are cross-cutting themes that are also discussed within this space.
- 7) Former Commissioner Urpilainen clarified that the Africa-Europe Foundation is a consortium founded by a prominent European think tank, Friends of Europe, and a leading African foundation, the Mo Ibrahim Foundation, in partnership with the African Climate Foundation, the ONE Campaign and several other stakeholders from civil society, business, policymaking, and the youth sector across both Africa and Europe.
- 8) According to the Commissioner's notification, the Africa-Europe Foundation operates under a two-tier governance structure. This structure consists of a High-Level Group, which assembles some of the most influential figures from both Africa and Europe, and an Executive Board, which includes representatives from the organisation's founding partners.
- 9) Former Commissioner Urpilainen's envisaged activity is related to her former Commission portfolio on 'International Partnerships'. The Independent Ethical Committee was therefore requested, on 12 December 2024, to deliver its opinion on the compatibility of the notified activity with Article 245 of the Treaty on the Functioning of the European Union.
- 10) The Committee delivered its opinion on 14 March 2025. The Committee first established the facts regarding the nature of the Africa-Europe Women Leaders

Network, its activities, its governance structure and organisation, the precise scope of Former Commissioner Urpilainen envisaged position and the funding of Africa-Europe Women Leaders Network.

- 11) The Committee noted that the Africa-Europe Women Leaders Network functions under the institutional umbrella of the Africa-Europe Foundation, which facilitates the Women Leaders Network's activities, strategy, and partnerships. According to publicly available information, the Africa-Europe Foundation is described as responsible for overarching strategic decisions and coordination of the Women Leaders Network.
- 12) The Committee noted and took into account the information provided by Former Commissioner Urpilainen on the Africa-Europe Women Leaders Network and on her envisaged activity. As regards her envisaged position, the Committee noted that specific details about the functions of individual members, particularly former Commissioners, are not publicly detailed.
- 13) The Committee underlined that, in response to an additional question from the Committee regarding the functions of individual members of the network, Former Commissioner Urpilainen clarified that their principal function is to take part in special dialogues to collaborate with other African and European experienced leaders on strategies to increase cross continental cooperation and reinforce Africa-Europe cooperation at the multilateral level. Former Commissioner Urpilainen further explained that each meeting has a thematic focus and often an expert briefing to feed the discussion or an insight from one of the heads of international organisations affiliated to the Network.
- 14) On the funding of the Africa-Europe Women Leaders Network, the Committee noted that there is no publicly available information regarding its budget. The Committee captured nevertheless the information provided by the Transparency Register of the European Parliament, the Council of the European Union and the European Commission. More precisely, the Committee noted that in 2023 <sup>(1)</sup>, the Africa-Europe Foundation received a total of 1,256,462 EUR in EU grants, including 182,510 EUR from the European Climate, Infrastructure and Environment Executive Agency (CINEA) and 1,073,952EUR from the European Commission's Directorate-General for International Partnerships (DG INTPA), which worked under the authority of Former Commissioner Urpilainen.
- 15) The Committee furthermore noted that the Transparency Register also mentions a steering meeting held on 9 July 2024, in Brussels between the Africa-Europe Foundation with the Director-General of DG INTPA.

---

<sup>(1)</sup> This is the most recent closed financial year detailed on the Transparency Register ([organisation detail - European Union](#), last consulted on 28 February 2025).

- 16) The Committee furthermore quoted the following reply given by Former Commissioner Urpilainen to the Committee's additional questions regarding the specific powers of the Africa-Europe Foundation over the Women Leaders Network, the existence of an independent budget of the Women Leaders Network and whether the Women Leaders Network apply, directly or indirectly, for EU funding: As replied by Former Commissioner Urpilainen, "*the Women Leaders Network is an independent group and does not apply for any funding from the European Union or other sources. The Africa-Europe Foundation acts as secretariat in helping support the online and in person meetings of the Women Leaders Network and this resourcing is specifically from a budget from the Africa-Europe Foundation's founders (e.g. Mo Ibrahim Foundation) and not any institution.*"
- 17) 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.
- 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 of the notified activity, the Committee first underlined that the work of the Africa-Europe Women Leaders Network is linked to Former Commissioner Urpilainen's portfolio on "International Partnerships". The Committee furthermore noted that Former Commissioner Urpilainen will be engaging in networking activities and discussions with other leaders. The activity is not related to the acquisition or distribution of funds and does not involve any direct activities of lobbying the EU institutions. Moreover, the Committee noted that the objectives of the Africa-Europe Women Leaders Network are widely shared at global level, including by the European Union.
- 20) The Committee considered that Former Commissioner Urpilainen's envisaged activity does not represent a risk with regard to the interests of the Commission and did not identify any legal or other impediments to accepting the functions, 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.
- 21) 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 <sup>(2)</sup> Members or staff of the European Commission on behalf of the Women Leaders Network on matters for which she was responsible within her portfolio for a period of two years after ceasing to hold office, yet adding that 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.

- 22) The Committee also considered that the Commission's decision should also recall that Former Commissioner Urpilainen must strictly respect Article 339 TFEU, 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.
- 23) Additionally, in line with the Committee's opinion, the Commission 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, with respect to the Commission's decisions and activities during her terms of office. She must not disclose anything, which was said at meetings of the Commission, or call into question decisions taken by the Commission during these periods.
- 24) 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.
- 25) On the base of the above-mentioned considerations, the Committee concluded that Former Commissioner Urpilainen's envisaged activity would be compatible with Article 245 TFEU.

---

<sup>(2)</sup> 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.

HAS DECIDED AS FOLLOWS:

*Article 1*

Former Commissioner Urpilainen's envisaged post term of office activity as member of the Africa-Europe Women Leaders 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 Africa-Europe Women Leaders Network, and/or in the interest of the entities who support the Africa-Europe Foundation 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 Strasbourg, on 1 April 2025.

*The President*  
*Ursula von der Leyen*