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**DECISION OF THE EUROPEAN COMMISSION**

**on Former Commissioner Kadri Simson's envisaged post term of office professional activity as member of the Global Council for Responsible Transition Minerals of the Paris Peace Forum**

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### **on Former Commissioner Kadri Simson's envisaged post term of office professional activity as member of the Global Council for Responsible Transition Minerals of the Paris Peace Forum**

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 email of 10 April 2025, Former Commissioner Simson notified the Commission of her intention to join the Global Council for Responsible Transition Minerals of the Paris Peace Forum. Former Commissioner Simson explained that this Global Council is an independent, high-level and multistakeholder group of ten members and meets four times per year.
- 5) According to open sources, the Global Council for Responsible Transition Minerals ('Global Council') was formally established in 2023 under the auspices of the Paris Peace Forum, building upon the Forum's preceding efforts commenced in 2022 to promote responsible practices within the critical minerals sector. The Global Council's mandate is to address a coordinated, sustainable, and inclusive framework governing the extraction, production, and trade of transition minerals, which are essential components in the global transition to net-zero emissions, particularly in the context of clean energy technologies, such as batteries, wind turbines, and solar panels.
- 6) The notified activity appears closely linked to the Former Commissioner's 'Energy' portfolio in view of the political responses that the Global Council for Responsible Transition Minerals <sup>(1)</sup> is expected to provide on important issues and challenges with strong relevance under energy policy. The Independent Ethical Committee was therefore requested, on 16 April 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 2 June 2025. The Committee first established the facts regarding the nature of the Paris Peace Forum, its activities, its partners, its governance, its funding, the role of the Global Council for responsible Transition Minerals. The Committee further assessed the nature of Former Commissioner Simson's envisaged activity, taking into account its link with her former functions as Member of the European Commission. The Committee then examined the legal context applicable and drew its conclusions on the compatibility of the envisaged activity vis-à-vis the legal context.
- 8) The Committee noted that the Paris Peace Forum, headquartered in Paris, is an independent, non-profit association, with legal personality since its establishment on 9 March 2018. The Committee underlined that according to its website <sup>(2)</sup>, the Paris Peace Forum's principal objective is to mobilise policymakers worldwide around the challenges of peacebuilding and to strengthen cooperation in the pursuit of more effective global governance. The Committee added that the Paris Peace Forum provides institutional support to international organisations whose objectives are

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<sup>(1)</sup> <https://parispeaceforum.org/initiatives/global-council-for-responsible-transition-minerals/>

<sup>(2)</sup> [Paris Peace Forum](#) last consulted on 20 May 2025

aligned with its own and also seeks to increase public awareness of global challenges promoting private initiatives capable of addressing them effectively <sup>(3)</sup>.

- 9) As regards the Paris Peace Forum's activities, the Committee indicated that, according to its website <sup>(4)</sup>, the Paris Peace Forum has supported more than 600 projects and launched over 30 policy initiatives aimed at addressing global challenges since its inception. In total, it has gathered 45,000 participants, including 147 Heads of state and government. The Committee added that each year, the Paris Peace Forum brings together more than 1,000 participants in Paris during late autumn, fostering dialogue and collaboration across sectors and regions. The next event will take place on 29 and 30 October 2025. In addition to their annual event, the Committee noted that the Paris Peace Forum also contributes to other major global summits held in Paris. Since 2018, the Paris Peace Forum has held an annual 'Call for Solutions' where it chooses projects focused on concrete solutions for global governance and public goods. Among those projects exhibited, the 'Scale-Up Program' chooses ten projects a year which receive support. The Committee finally stressed that the Paris Peace Forum plays a role in advancing key global public goods through a range of dedicated initiatives.
- 10) As concerns the Paris Peace Forum's partners, the Committee underlined that according to its website <sup>(5)</sup>, the Paris Peace Forum receives the support of numerous benefactors, including foundations, businesses, development agencies, governments, and philanthropic actors that share its mission and contribute financially or in-kind to its activities. The Committee noted that this includes the European Commission, which is listed on the website as a 'strategic partner'.
- 11) The Committee noted also that the Paris Peace Forum has governance bodies that decide the strategic, legal, and budgetary orientations, which are implemented by its Permanent Secretariat <sup>(6)</sup>. The Committee underlined that the Paris Peace Forum's structure consists of a President, an Executive Committee responsible for strategic oversight consisting of nine members, including the European Commission <sup>(7)</sup>, a General Assembly including members of the Executive Committee as well as additional members, and a Steering Committee ensuring the alignment of the Paris Peace Forum's work with its global mission, as well as a permanent Secretariat, with a Director-General and various teams.
- 12) On the funding of the Paris Peace Forum, the Committee captured 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 2024, the Paris Peace Forum received a total of 7,492,900 EUR from donations,

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<sup>(3)</sup> [Missions and values - Paris Peace Forum](#)

<sup>(4)</sup> [Our impact - Paris Peace Forum](#)

<sup>(5)</sup> [Partners - Paris Peace Forum](#)

<sup>(6)</sup> [Governance - Paris Peace Forum](#)

<sup>(7)</sup> Currently represented by the Deputy Director-General of the Directorate-General for International Partnerships.

member contributions, EU funding, public funding, and grants. The Committee noted notably that the Paris Peace Forum received a total of €1,000,000 in funding from the European Union, comprising €300,000 from the Service for Foreign Policy Instruments and €700,000 from the Directorate-General for International Partnerships. The Committee noted that, among the remaining large contributors, were the French Ministry for Europe and Foreign Affairs, the Bill & Melinda Gates Foundation, and the Open Society Foundations. Additionally, the Committee noted that the Transparency Register indicates two meetings between the Paris Peace Forum and the Director-General for Environment in 2024 <sup>(8)</sup>.

- 13) Concerning the Global Council for Responsible Transition Minerals, the Committee noted that this Global Council is a high-level, independent initiative established by the Paris Peace Forum in 2023 and benefits from the organisational structure of the Paris Peace Forum. The Committee underlined that the Global Council addresses the issue of transition minerals, which are resources essential for the global shift to net-zero emissions, particularly for clean energy technologies such as batteries, wind turbines, and solar panels including lithium, cobalt or nickel. The Committee emphasised that the Global Council brings together ten prominent figures from government, academia, civil society, and industry across both the Global North and South. The Committee added that their collective aim is to align mineral governance with sustainable development objectives, while fostering global collaboration and inclusive economic opportunities, particularly for mineral-rich developing countries.
- 14) The Committee noted that the Global Council's activities are structured around five thematic workstreams: (1) tackling the global fragmentation of multilateral efforts; (2) advancing international cooperation for financing responsible mining; (3) fostering value creation for mineral-rich countries; (4) enhancing transparency in mineral markets; and (5) ensuring social and environmental sustainability in the mineral supply chains <sup>(9)</sup>. The Committee added that the Global Council's work is informed by a network of Special Advisors, comprising over 40 independent experts from a diverse range of organisations.
- 15) The Committee highlighted that Former Commissioner Simson was invited to participate in the Global Council and contributing to the work of the five abovementioned workstreams. Based on the available information, the Committee is not aware of a remuneration of the members of the Global Council.
- 16) The Committee then 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 Simson's envisaged activity with Article 245 of the Treaty on the Functioning of the European Union.

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<sup>(8)</sup> *ibidem*

<sup>(9)</sup> *ibidem*

- 17) 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.
- 18) On the substance of the notified activity, the Committee first noted that the Global Council is closely tied to Former Commissioner Simson's 'Energy' portfolio. The Committee furthermore noted that the envisaged role consists in participating in the work of the Global Council, which involves promoting international cooperation on the topic of transition minerals. This role does not involve any lobbying or responsibilities in securing funding for the Paris Peace Forum or the Global Council. Moreover, the Committee noted that the objectives of the Paris Peace Forum and Former Commissioner Simson's involvement are not for profit and pursue aims that are aligned with those of the European Union.
- 19) The Committee concluded that Former Commissioner Simson'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 Simson 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 Simson remains bound by Article 11(4) of the Code of Conduct, laying down the obligation to refrain from lobbying <sup>(10)</sup> Members or staff of the European Commission on behalf of the Paris Peace Forum 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.
- 21) The Committee furthermore considered that the Commission's decision should also recall the confidentiality obligation laid down in Article 339 TFEU, 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

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<sup>(10)</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.

discretion with respect to the Commission's decisions and activities during their term of office.

- 22) Finally, the Committee considered that the Commission decision should 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.
- 23) Subject to the above-mentioned considerations, the Committee concluded that Former Commissioner Simson's envisaged activity would be compatible with Article 245 TFEU.
- 24) The Commission has considered the Committee's opinion and shares its conclusions.

HAS DECIDED AS FOLLOWS:

#### *Article 1*

Former Commissioner Simson's envisaged post term of office activity as member of the Global Council for Responsible Transition Minerals of the Paris Peace Forum 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 Simson 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 Simson 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 Simson shall refrain from lobbying the Commission on behalf

of the Paris Peace Forum 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 Simson 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 17 June 2025.

*The President*  
*Ursula von der Leyen*