

ECB high level Officials' declarations of conflicts of interest in line with Articles 11 and 12 of the Single Code of Conduct

Safeguards:

in addition to 1) delayed publication and 2) advance information of affected high-level ECB officials, 3) the third parties () and 4) the entities (**) are presented in a not identifiable way.*

Name/Position	Topic	Ethics Committee Opinion and outcome of deliberations	Other follow up
Luis de Guindos ECB Vice-President Governing Council member	Gainful occupational activities of family member**	On 25 October 2018, the Ethics Committee approved the assessment and opinion [ECB/EC/18/1] ¹	The advice was transmitted the same day and the ECB President was informed.
Olli Rehn, Governing Council member	Gainful occupational activity of family member*	On 20 February 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/1] ¹	The advice was transmitted the same day and the ECB President was informed.
Madis Müller, Governing Council member [former Supervisory Board member]	Gainful occupational activity of family member**	On 25 March 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/2] ¹	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Mr Joachim Wuermeling, Supervisory Board member	Gainful occupational activity of family member**	On 6 May 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/3] ¹	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Gottfried Haber, Supervisory Board member	Gainful occupational activity of family member*	On 29 July 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/4] ¹	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Kerstin af Jochnick, Supervisory Board member	Gainful occupational activity of family member*	On 24 October 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/5] ¹	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Mārtiņš Kazāks, Governing Council member	Notification of a potential conflict of interest	On 3 February 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/1]	The advice was transmitted the same day and the ECB President was informed.

¹ Public versions of Ethics Committee Opinions have been prepared to protect personal data

Kristīne Černaja-Mežmale, Supervisory Board member	Notification of a potential conflict of interest and a gainful occupational activity of family member*	On 25 June 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/2] ¹	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Māris Kālis, Supervisory Board member	Notification of a potential conflict of interest**	On 5 August 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/3]	The advice was transmitted the same day and the Chair of the Supervisory Board was informed.
Mārtiņš Kazāks, Governing Council member	Notification of a potential conflict of interest**	On 5 August 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/4]	The advice was transmitted the same day and the ECB President was informed.
François Villeroy de Galhau, Governing Council member	Gainful occupational activity of family member*	On 5 January 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/21/1] ¹	The advice was transmitted the same day and the ECB President was informed.

ECB high level Officials' post mandate notifications in line with Article 17 of the Single Code of Conduct

Safeguards:

*in addition to 1) delayed publication and 2) advance information of affected high level ECB officials, 3) the envisaged activity is presented in a non-identifiable manner, in case it has not been taken up (alternatively publication could be further delayed) ***

Name/Position	Role	Ethics Committee Opinion and outcome of deliberations	Governing Council outcome of deliberations /Other follow-up
Ignazio Angeloni, former Supervisory Board member	Senior Fellow to the activities of the Sustainable Architecture for Finance in Europe (SAFE) and the Harvard Kennedy School of Government	On 8 April 2019, the Ethics Committee approved the assessment and draft reply of the ECB President. The Ethics Committee confirmed that no cooling-off period should be applied in this case.	The advice was transmitted by the ECB President on the same day and the Chairman of the Supervisory Board was informed [Letter ECB/MD/19/1].
Jozef Makúch, former Governing Council member	Visiting Professor at the University of Economics in Bratislava	On 15 April 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/6] . The Ethics Committee confirmed that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Makúch was accordingly informed on 8 May 2019 [Letter ECB/MD/19/2].
Mr Ewald Nowotny, former Governing Council member	Adviser to the Chairman of the Supervisory Board of an Austrian credit institution directly supervised by the ECB **	On 31 July 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/7] . The Ethics Committee considered that a nine months cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council concluded that a one-year cooling-off period should nevertheless be applied in this case. Mr Nowotny was accordingly informed on 30 September 2019 [Letter ECB/MD/19/4].
Vytautas Valvonis, former Supervisory Board member	High Level Adviser to an EU mission in Moldova	On 11 September 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/8] . The Ethics Committee confirmed that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Valvonis was accordingly informed on 13 September 2019 [Letter ECB/MD/19/3].

Peter Praet, former Governing Council and Executive Board member	Set up a private company having the objective of delivering speeches and providing macroeconomic advice to financial firms	On 24 October 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/9]. The Ethics Committee confirmed that a six months cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Praet was accordingly informed on 12 November 2019 [Letter ECB/CL/19/1].
Elisa Ferreira, former Supervisory Board member	Member of the European Commission	On 24 October 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/10]. The Ethics Committee confirmed that no cooling-off period should be applied in this case.	The advice was transmitted by the Chairman of the Supervisory Board on 29 October 2019 [Letter ECB/AE/19/1].
Ewald Nowotny, former Governing Council member	Member of the Advisory Board of Scope Ratings GmbH	On 4 November 2019, the Ethics Committee approved the assessment and draft reply [ECB/EC/19/11]. The Ethics Committee concluded that the activity did not constitute a gainful occupational activity.	The advice was transmitted by the Ethics Committee Chairman on the same day.
Benoît Cœuré, former Governing Council and Executive Board member	Head of the Innovation Hub and member of the Executive Committee of the Bank for International Settlement (BIS)	On 9 November 2019, the Ethics Committee approved the assessment and opinion [ECB/EC/19/12]. The Ethics Committee confirmed that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Cœuré was accordingly informed on 13 November 2019 [Letter ECB/CL/19/2].
Sabine Lautenschläger, former Governing Council and Executive Board member and Vice-Chair of the Supervisory Board	Non-executive member of the Board of Directors of the Dubai Financial Services Authority	On 17 January 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/7]. The Ethics Committee confirmed that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Ms Lautenschläger was accordingly informed on 29 January 2020 [Letter ECB/CL/20/3].
Klaus Kumpfmüller, former alternate Supervisory Board member	CEO of HYPO Oberösterreich (Oberösterreichische Landesbank AG)	On 24 January 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/8]. The Ethics Committee confirmed that a six months cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Kumpfmüller was accordingly informed on 31 January 2020 [Letter ECB/CL/20/4].

<p>Ardo Hansson, former Governing Council member</p>	<p>(i) (non-executive) member of the Supervisory Board of Coop Pank AS, a less significant Estonian credit institution;</p> <p>(ii) part-time visiting Professor or Adjunct Professor at Estonian universities; and</p> <p>(iii) a project-based consultant for a (public) International Financial Institution (a multilateral development bank)</p>	<p>On 21 February 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/9].</p> <p>The Ethics Committee confirmed that a one-year cooling-off period should be applied for the first role. The Ethics Committee confirmed that no cooling-off period should be applied for the other two roles.</p>	<p>Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.</p> <p>Mr Hansson was accordingly informed on 6 March 2020 [Letter ECB/CL/20/5].</p>
<p>Andreas Ittner, former Supervisory Board member and alternate Governing Council member</p>	<p>Advisor of Amundi Austria GmbH</p>	<p>On 15 May 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/10].</p> <p>The Ethics Committee confirmed that a six months cooling-off period should be applied in this case.</p>	<p>Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.</p> <p>Mr Ittner was accordingly informed on 27 May 2020 [Letter ECB/CL/20/6].</p>
<p>Jozef Makúch, former Governing Council member</p>	<p>Member of the Supervisory Board of Kooperativa poisťovní, a.s. Vienna Insurance Group</p>	<p>On 30 July 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/11].</p> <p>The Ethics Committee confirmed that a six months cooling-off period should be applied in this case.</p>	<p>Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.</p> <p>Mr Makúch was accordingly informed on 11 August 2020 [Letter ECB/CL/20/7].</p>
<p>Klaus Kumpfmüller, former alternate Supervisory Board member</p>	<p>Deputy Chairman of the Supervisory Boards of</p> <p>(i) Kepler-Fonds Kapitalanlagegesellschaft m.b.H.;</p> <p>(ii) WAG Wohnungsanlagen</p>	<p>On 14 September 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/12].</p> <p>The Ethics Committee confirmed that a three-months cooling-off period should be applied for the first role. The Ethics Committee confirmed that no cooling-off period should be applied for the other two roles.</p>	<p>Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.</p> <p>Mr Kumpfmüller was accordingly informed on 25 September 2020 [Letter ECB/CL/20/8].</p>

Maive Rute, former Supervisory Board member	Gesellschaft m.b.H.; and (iii) EBS Wohnungsgesellschaft m.b.H. Linz		
	Deputy Director General in the Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs of the European Commission	On 5 October 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/5] . The Ethics Committee considered that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Ms Rute was accordingly informed on 13 October 2020 [Letter ECB/CL/20/1].
Ignazio Angeloni, former Supervisory Board member	Member of the Advisory Board of a joint initiative between an asset management firm and a think tank**	On 4 November 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/13] . The Ethics Committee confirmed that a six months cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Angeloni was accordingly informed on 13 November 2020 [Letter ECB/CL/20/9].
Mario Vella, former Governing Council member	Special Commissioner for Economic, Financial and Trade Relations with the United Kingdom, within the Maltese Government	On 11 November 2020, the Ethics Committee approved the assessment and opinion [ECB/EC/20/6] . The Ethics Committee considered that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Vella was accordingly informed on 18 November 2020 [Letter ECB/CL/20/2].
Ardo Hansson, former Governing Council member	Economic Adviser to the Estonian Prime Minister	On 5 February 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/21/2] . The Ethics Committee confirmed that no cooling-off period should be applied in this case, given the lapse of time from the end of term.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Angeloni was accordingly informed on 10 February 2021 [Letter ECB/CL/21/1].
Peter Praet, former Governing Council and Executive Board member	Consultancy assignment for a provider of Financial Market Infrastructure (FMI) services**	On 16 February 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/21/3] .	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.

Mario Draghi, former ECB President and Governing Council member		The Ethics Committee confirmed that no cooling-off period should be applied in this case, given the lapse of time from the end of term.	Mr Praet was accordingly informed on 22 February 2021 [Letter ECB/CL/21/2].
	Italy's Prime Minister	The Ethics Committee considered that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Draghi was accordingly informed on 26 February 2021 [Letter ECB/CL/21/3].
Vitas Vasiliauskas, former Governing Council member	Adviser to the Lithuanian Prime Minister	On 21 July 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/22/1]. The Ethics Committee considered that no cooling-off period should be applied in this case.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Vasiliauskas was accordingly informed on 28 July 2021 [Letter ECB/CL/22/1].
Sabine Lautenschläger, former member of the Governing Council and Executive Board, former Vice-Chair of the Supervisory Board	Senior Advisor in US law firm, Covington & Burling LLP	On 5 August 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/22/2]. The Ethics Committee confirmed that no cooling-off period should be applied in this case, given the lapse of time from the end of term.	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Ms Lautenschläger, was accordingly informed on 1 September 2021 [Letter ECB/CL/22/2].
Yves Mersch, former member of the ECB Executive Board and Governing Council	Member of the Board of Trustees of "Scope" Foundation	On 15 October 2021, the Ethics Committee approved the assessment and opinion [ECB/EC/21/4]. The Ethics Committee considered that taking on such responsibility would be subject to a six-month cooling-off period and that such cooling-off period has meanwhile been observed. Nevertheless, in order to credibly avoid the merest doubts on Mr Mersch's impartiality and to best protect the independence and integrity of the ECB and that of its (former) high-level officials, the Ethics Committee	Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee. Mr Mersch was accordingly informed on 25 October 2021 [Letter ECB/CL/21/4].

Ed Sibley, former member of the Supervisory Board		considered appropriate asking Mr Mersch to abstain from participating in matters/discussions/deliberations on dossiers that also fall within the remit of the ECB, until the end of his two-year notification period established by Article 17.1 of the Single Code.	
	Non-equity partner in the financial services practice of a professional services firm	<p>On 9 March 2022, the Ethics Committee approved the assessment and opinion [ECB/EC/22/3].</p> <p>The Ethics Committee considered that taking on such responsibility would be subject to a six-month cooling-off period from the date that Mr Sibley resigned from his role as member of the Supervisory Board (14 February 2022).</p>	<p>Having taken note of the information provided by the ECB President, the Governing Council confirmed that it shared the assessment of the Ethics Committee.</p> <p>Mr Sibley was accordingly informed on 17 March 2022 [Letter ECB/CL/22/43].</p>