

THE ETHICS COMMITTEE

ECB/EC/23/23

ECB-PUBLIC

Ms Sabine Mauderer
Alternate Member of the Governing Council

2 November 2023

Subject: Request for advice on private activity

Dear Ms Mauderer,

On 10 October 2023, you informed the Ethics Committee of your intention to become a member of the “Group of Trustees” for the Principles for Stable Capital Flows and Fair Debt Restructuring.

In formulating its assessment, the Ethics Committee took into account the mandate of the Group of Trustees, its relevance to the ECB’s core activities such as monetary policy and/or banking supervision. It notes that none of these topics are themselves part of the mandate of the Group of Trustees and especially that the latter does not address any topics of microprudential supervisory nature or other issues related to individual financial entities. The Group rather focuses on issues related to the eon of the international financial system, which are of interest to the ECB from a global financial stability perspective. Yet, this is foremost of indirect relevance as the Group’s focus is not on the euro area but on emerging markets and other major debtor countries, which is outside the scope of the ECB’s mandate.

Hence, given the remoteness of overlapping / conflicting responsibilities, the Ethics Committee is of the view that the activity does not raise conflict of interest concerns with your role as alternate member of the Governing Council. Still, considering that the themes on global financial stability are not delinked from the ECB’s interests, the Ethics Committee recommends minimum safeguards. To this end, the Committee suggests that you would refrain from intervening in exchanges, should topics of a direct link to the Eurosystem’s or the ECB’s activities be addressed or, alternatively, relay the position adopted (and made public) by the ECB, to avoid potential issues of loyalty and/or inconsistencies of stances to arise.

The Ethics Committee notes that the Group of Trustees consists mainly of central bank governors and senior members of international organisations, government and administration while some are senior representatives of credit institutions. However, the presence of private sector participants does not *ipso facto* preclude a high-level official from participating in an event or becoming a member to a group such as the one at hand.

Furthermore, the activity is unremunerated and trustees' time commitment are kept to a minimum (one/two meetings per year). Taking into account the above and considering the positive impact of the Principles on the resilience of the global financial system in the event of sovereign debt crises, the Ethics Committee concludes that this activity cannot be seen as having a negative impact on your obligations as an alternate member of the Governing Council, nor as damaging the ECB's reputation.

Nevertheless, for the sake of good order, the Ethics Committee wishes to recall your obligation of professional secrecy at all times.

In addition, the Ethics Committee wishes to stress that its assessment applies exclusively and is strictly limited to your role as alternate member of the Governing Council, i.e. your role as high-level ECB Official as covered by the Single Code of Conduct, and is independent from any assessment being made at a national level for instance as regards your responsibilities at and your commitments vis-à-vis the Bundesbank in your capacity as Member of the Executive Board of the Bundesbank, which may be subject to different national rules. In this regard, the Ethics Committee notes that you have informed the Corporate Governance Officer of the Bundesbank, who did not raise objections.

Finally, the Ethics Committee recalls that, in line with the Governing Council decision of 16 February 2022, opinions on envisaged private activities are, as a rule, published with a six-month delay.

With best regards,

The Chairman of the Ethics Committee (Erkki Liikanen)