EUROPEAN CENTRAL BANK
EUROSYSTEM

THE ETHICS COMMITTEE

ECB/EC/25/01

ECB-PUBLIC

Ms Isabel Schnabel
Member of the Executive Board and
Member of the Governing Council of the European Central Bank

28 February 2025

Subject: Notification of a gainful occupational activity of a family member[1] that may raise conflict-of-interest concerns

Dear Ms Schnabel,

Thank you for notifying the Ethics Committee of a new professional role to be taken up by a family member at a global financial services firm in London. Your notification has been duly registered in line with good administration.

The Ethics Committee notes that although the global financial services firm is not directly supervised by the ECB, some of its European subsidiaries are supervised directly by the ECB. Moreover, some of them are also eligible monetary policy counterparties of the Eurosystem.

Taking this into account and considering that prudential supervisory decisions are ultimately taken by the ECB Governing Council, the Ethics Committee considers it essential to proactively address possible public perceptions that private or personal interests related to the new occupational activity of a family member could negatively affect the impartial and objective performance of your duties and responsibilities as member of the Governing Council.

To this end and in line with the advice formulated in comparable previous opinions, the Ethics Committee:

- asks you to recuse yourself from any discussion/consideration of the ECB decision-making bodies on matters directly related to the global financial services firm or one of its subsidiaries. This means in concreto that you would neither be granted access to related documents nor participate in discussions and deliberations nor exercise any voting rights (in meetings or written procedures); the Secretary of the Ethics Committee will inform the Secretary of the Governing Council accordingly. Since prudential supervisory decisions are ultimately taken by the ECB Governing

[1] Disclaimer: In accordance with applicable data protection legislation, parts containing personal data of third parties have been redacted from these opinions

Council, this measure also covers all decisions submitted by the Supervisory Board for adoption by the Governing Council;

- considers that, given the junior professional role of the family member, an extension of the recusal to the direct competitors of the global financial services firm or one of its subsidiaries would be disproportionate;
- finally notes that, in the event of the global financial services firm or one of its subsidiaries entering into a controlling-stake or a strategic alliance with another credit institution under SSM supervision or the family member obtaining a more senior position at an entity of the global financial services firm, the possible extension of scope of the mitigating measures would need to be re-examined.

The Ethics Committee is confident that through adherence to the above safeguards and a proper recording of their application in the relevant proceedings of the Governing Council, risks arising from (perceived) conflict of interest concerns are effectively and satisfactorily addressed.

For the sake of good order, the Ethics Committee wishes to recall the importance of your professional secrecy obligations.

Finally, please also note that in line with the transparency policy adopted by the Governing Council in July 2020, opinions issued by the Ethics Committee on possible conflicts of interests of high-level ECB officials are published on the ECB website with a six-month delay.

With best regards,

The Chairman of the Ethics Committee (Erkki Liikanen)

Cc: C. Lagarde, ECB President

P. Senkovic, Secretary to the ECB Governing Council