

# Annual Declaration of Interests (ADoI)

You are required to complete and sign this form in order to confirm that you have read and taken note of Article 11a of the Staff Regulations as applied by the Conditions of Employment of Other Servants, the Ethics Guidelines (EBA DC 271) and the EBA's Policy on Independence and Decision Making Processes for avoiding Conflicts of Interest (Conflict of Interest Policy) for Staff and Other Contractual Parties (EBA DC 104rev1).

Signing this declaration should prompt you to consider whether you may have a possible conflict of interest that could affect the performance of your duties at the EBA. The act of signing the declaration should also remind you that when you have a conflict of interest, you should inform the Appointing Authority immediately.

Article 11a of the Staff Regulations states the following:

- "1. An official shall not, in the performance of his duties and save as hereinafter provided, deal with a matter in which, directly or indirectly, he has any personal interest such as to impair his independence, and, in particular, family and financial interests.*
- 2. Any official to whom it falls, in the performance of his duties, to deal with a matter referred to above shall immediately inform the Appointing Authority. The Appointing Authority shall take any appropriate measure, and may in particular relieve the official from responsibility in this matter.*
- 3. An official may neither keep nor acquire, directly or indirectly, in undertakings which are subject to the authority of the institution to which he belongs or which have dealings with that institution, any interest of such kind or magnitude as might impair his independence in the performance of his duties."*



**I hereby declare that I have read Article 11a of the Staff Regulations, the Ethics Guidelines (EBA DC 271) and the EBA's Policy on Independence and Decision Making Processes for Avoiding Conflicts of Interest (Conflicts of Interest Policy) for Staff and Other Contractual Parties (EBA DC 104 rev1) and am aware of my obligations.**

**I attach a list of my current interests (annex 1) and, where applicable, sources of conflict of interest (annex 2).**

**Whenever I have a conflict of interest, I will alert the Appointing Authority.**

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**Annex 1. List of financial assets according to Article 4 and point (1.3) (a) of Article 1:**

Article 1 point 1.3 (a): Economic interest meaning any economic stake or share in a body, in particular any financial institutions that are under the EBA's scope of action (as defined in Article 1(2) and (3) of Regulation (EU) No 1093/2010 including the stocks, equities or bonds thereof, or of one of its subsidiaries or of a company in which it has a holding. Staff should also declare any holdings insurance undertakings. Economic interests also include crypto currencies held as investment. This does not include personal insurance policies, collective investment funds<sup>1</sup> or deposits contracted as a regular customer;

Suld declare all such economic interests that they hold or have held during a period of five years preceding the submission of this declaration.

Staff is reminded that dealings in financial instruments requires in some cases prior approval and in nearly all cases a prior notification to the Ethics Officer in line with the Ethics Guidelines. This obligation exists in addition to the above declaration.

	Name and ISIN	Date of acquisition	Number of shares or nominal value	Date of sale
1	Citigroup Inc US1729674242	26.02.2021		06.01.2022
2	Nordea Bank Abp FI4000297767	19.08.2021		28.12.2021
3	Luminor Group shares (MiCom)	01.01.2018		13.03.2021
4				
5				
6				
7				
8				
9				
10				

Use this space in case you want to explain any of the economic interests declared above:

I do not have any financial assets that fall under the definition of Article 1.3 (a) of the Conflicts of Interest Policy.

<sup>1</sup> Units in collective investment undertakings, that invest in shares of credit institutions, investment firms, financial conglomerates, or their group companies, should only be declared if their dealing would require notification under the Ethics Guidelines.

**Annex 2. Source(s) of conflict of interest, actual (past or present) or potential (declare separately all relevant COI); according to Article 4 of the Conflict of Interest Policy, you need to declare all activities that, during a period of five years preceding the submission of the declaration, could create actual or potential conflicts of interests:**

**Type of conflict (as per Article 1)**

- Membership of a body with an interest in the subject matter
- Employment (including being a SNE or on unpaid leave)
- Consultancy
- Intellectual property
- Other memberships
- Other (e.g. gainful employment of the spouse in the financial sector)
- No conflict of interest to be declared

**In all cases, please provide as many details as possible (in the case of a body or employer, full name, location, private or public nature and your role):**

Description: Luminor Bank AS, Member of Board. Liivalaia 45, Tallinn, Estonia

**Period concerned:**

- Past, from 16.16.2017 to: 5.01.2021
- Present, since: to:

**State the fact, task, responsibility or procedure in which you are involved in the performance of your duties that is actually or could potentially be perceived as being in conflict with the above personal interest:**

**Please state the reasons why you consider that your independence may be or has been impaired or explain why this is not the case:**

I held a role as a Chief Compliance Officer, member of the Management Board for the Luminor Group. This role has been terminated over 26 months ago. This role was subject to the remuneration which consisted fixed and variable pay. Following applicable Eu Directives and RTSs, part of the variable pay occurred in year 2018- 2020 were waved and subject to payout during following 5 years after the variable pay was assigned by the Board of Directors of the Bank. So those annual payouts may occur until 2025.

**Period concerned:**

- Past, from: to:
- Present, since: to:

**State the fact, task, responsibility or procedure in which you are involved in the performance of your duties that is actually or could potentially be perceived as being in conflict with the above personal interest:**

**Please state the reasons why you consider that your independence may be or has been impaired or explain why this is not the case:**

**Signature****Marilyn Pikaro**

Digitally signed by Marilyn Pikaro  
Date: 2023.06.15 07:54:07  
+02'00'

Once the form is completed and signed, please submit it by uploading it with the relevant request in EBA Ethics Workflow