

## **Annual Declaration of Interest**

You are required to 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 EBA's Staff Ethics Rules (EBA DC 271), 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 do have a conflict of interest you should inform the Appointing Authority accordingly.

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 EBA's Staff Ethics Rules (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.

Please fill in and sign Annex 1 and 2.



## 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;

Staff should declare all such economic interests that they hold or have held during the same year and the year prior to this declaration (e.g. for the declaration made in 2018, all such interest that have been held at any point during 2018 and 2017 must be declared, even if the interest is not held any longer when the declaration is made.

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	Date of sale
			or nominal value	
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>&</sup>lt;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.

explain why this is not the case:



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 all such activities during five years preceding the submission of the declaration, that could create actual or potential conflicts of interests, have to be declared:

		•				
Туре	of conflict (as	s per Ar	ticle 1)			
	Membership of a body with an interest in the subject matter					
~	Employment (including being a SNE or on unpaid leave)					
	Consultancy					
$\overline{\Box}$	Intellectua	I prope	rtv			
Ħ	Other men		•			
П		Other (e.g. gainful employment of the spouse in the financial sector)				
H	No conflict of interest to be declared					
Ш	NO COMMICE	. Or litte	rest to be deciared			
In all o	cases, please	provid	le as many details a	s possible (in the	case of a body or employer, for	Ill
name,	location, pr	ivate or	public nature and y	our role):		
Desc	Description: Luminor Bank AS, Member of Board. Estonia					
Perio	d concerned:	from	16.06.2017	to:	05.01.2021	
0	Past, Present,	since:	10.00.2017	to:	03.01.2021	
State	•		sibility or procedure i		volved in the performance of you	r
duties	s that is actu	ally or c	ould potentially be po	erceived as being in	conflict with the above persona	I
intere						
	of Compliance Risk Commit		r, Chair of Business	Integrity and Susta	inability Committe, Member of	
1101	CON COMMIN					
	_					
PIPAC	o state the re	asons v	inv voll consider that	vour independence	nav he or has heen impaired o	•

No indpendence issues as this is a past professional experience which has been terminated over 12 months ago.

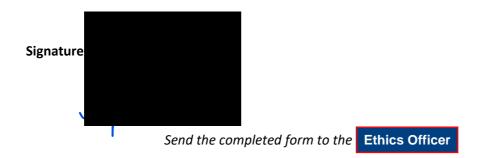


## Description:

Period	d concerned:		
0	Past,	from:	to:
0	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:





Assessment of the Ethics Officer			
Identified conflicts of interest:	Yes	No	
Please describe the COI:			
Suggested preventive measures:			
Signature of the Ethics Officer:			
Decision of the Executive Director:			
Signature of the Executive Director:			