

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 11 para.2 of the Staff Regulations (SR) states that:

An official shall not without the permission of the appointing authority accept from any government or from any other source outside the institution to which he belongs any honour, decoration, favour, gift or payment of any kind whatever, except for services rendered either before his appointment or during special leave for military or other national service and in respect of such service.

Article 11a of the Staff Regulations states that:

- 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 financial interests (or declaration of no financial interests) (annex 1) and sources of conflict of interest (or declaration of no conflict of interests) (annex 2).**
- ☒ **I am aware of and follow the rules applicable to the acceptance of gifts as outlined in annex 3.**
- ☒ **Whenever I have a conflict of interest, I will alert the Appointing Authority.**

Signature

REDACTED

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 funds¹ or deposits contracted as a regular customer”.

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

Staff is reminded that dealings in financial instruments require in some cases prior approval or prior notification to the Ethics Officer in line with the Ethics Guidelines. This obligation exists in addition to this declaration.

	Name and ISIN	Date of acquisition	Number of shares or nominal value	Date of sale
1	Citigroup Inc US1729674242	26.02.2021	Redacted	06.01.2022
2	Nordea Bank Abp FI400297767	19.08.2021	Redacted	28.12.2021
3	Luminor Group shares (MiCom)	01.01.2018	Redacted	13.03.2021
4				
5				
6				
7				
8				
9				

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.

¹ UCITS are to be declared only if invest in more than 40% in shares of credit institutions, investment firms, financial conglomerates, or their group companies.

Annex 2. Source(s) of actual (past or present) or potential conflict of interest

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.

Please declare all relevant situations separately

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 (e.g. gainful employment of the spouse in the financial sector)
- ☐ No conflict of interest to be declared

Please declare every situation separately and provide as many details as possible (in the case of a body or employer, full name, location, private or public nature and your role):

1. Description of the activity/personal interest:

Member of the Management Board, Chief Compliance Officer of Luminor Group AS in 2017-2021. Limited part of the remuneration was waved and paid out during the period 4 years after the employment with the bank.

Period concerned:

- ☒ Past, from 16.06.201 to: 05.01.2017
- ☐ Present, since:

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:

No independence issues as the employment was ended more than 4 years ago.

2. Description of the activity/personal interest:

Period concerned:

☐

Past,

from:

to:

☐

Present,

since:

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:

3. Description of the activity/personal interest:

Period concerned:

☐

Past,

from:

to:

☐

Present,

since:

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:

Annex 3 Acceptance of gifts

General rule

Gifts offered directly or indirectly by a third party, in the professional context, should not be accepted by EBA staff.

Exceptions

In exceptional cases, a gift can be accepted if:

- It does not compromise or is not perceived to compromise the staff member's objectivity and independence; and
- It does not damage the EBA's public image; and
- Its value does not exceed EUR 50.

Special cases

- If a gift's value exceeds EUR 50 and its acceptance would be in line with social, courtesy or diplomatic usage, the authorization of the Appointing Authority should be sought.
- Any gift above the value of EUR 150 shall always be refused.
- Any sum of money must always be refused.
- Benefits accumulated on private loyalty or membership cards (e.g. railway companies, airlines, hotels etc.) added by the staff member on the occasion of an EBA mission must be exclusively used for EBA business travel purposes in so far as they exceed the yearly EUR 50 limit.

Once the form is completed and signed, please submit it by uploading it with the relevant request in [EBA Ethics Workflow](#).