

Eurobank Conflicts of Interest Policy Statement

Scope & Applicability of the Conflicts of Interest Policy

Eurobank is committed to upholding the highest standards and principles of professional ethics. In performing its activities, Eurobank has established and implements a policy for the purpose of identifying and managing situations that give, or may give, rise to actual, potential or perceived conflicts of interest in accordance with local legislation and international best practices. The Policy takes into account the size and structure of the Group and the nature, scale and complexity of its business activities.

All staff and third parties must comply with the Policy at all times and failure to do so may result in disciplinary and/or legal actions.

Definition of Conflicts of Interest

Put simply, a conflict of interest is where an individual's or an entity's interests are in conflict with the interests of a client or the Eurobank Group. This can result in loss, either direct or indirect, financial or non-financial, for the client or the Group.

Conflicts of interest are categorized as follows:

- **Actual conflict of interest**, which occurs, for example, when a staff member's, a third party's or a Group company's interests are actually in conflict with the interests of the Group, joint venture or associated entity and could, therefore, be harmful to the interest of a client or the Group.
- **Potential conflict of interest**, which occurs, for example, when a staff member's, a third party's or a Group company's interests may be, or may become, in conflict with the interests of the Group, joint venture or associated entity and could, therefore, be harmful to the interests of a client or the Group.
- **Perceived conflict of interest**, which occurs, for example, when the public, or a third party, could perceive or form an opinion that a staff member's, a third party's or a Group company's interests are in conflict with the interests of the Group, joint venture or associated entity and could, therefore, be harmful to the interests of a client or the Group.

Conflicts of interest may arise in various ways including the following examples:

- between a Group company and the interests of a client, member of staff or third party
- between two or more units of the Group that have differing interests; or
- between the interests of two or more clients, when a product or service is provided by a Group company to those clients.

Risks of non-adherence to the Conflicts of Interest Policy

Conflicts of interest may give rise to one or more of the following risks:

- a member of staff engaging in unethical conduct;
- a Group Company or member of staff failing to fulfil a duty of care to a client;
- a staff member's professional judgement being compromised by personal interests;
- a Group Company or member of staff failing to comply with a legal or regulatory obligation; or
- a Group Company obtaining, or appearing to obtain, an improper advantage.

Policies and measures for the identification, prevention and management of conflicts of interest

The Group has adopted a series of policies and measures, for identifying, preventing and managing conflicts of interest situations arising from the business activities of the Group, including providing investment and/or ancillary services to clients. Such policies and measures are appropriate to the size and the activities of the Group and proportional to the risk of loss or damage to clients' interests.

Indicative examples of such policies and measures are the following:

- Differentiation of reporting lines - Segregation of duties;
- Confidentiality - Restricted access policy;
- Segregation of executive and non-executive responsibilities of the members of the Board of Directors (BoD) and assessment of their independence of mind.

To comply with the Policy, staff must inform Compliance whenever they identify an actual, potential or perceived conflict of interest and consult with Compliance when they are uncertain as to whether a conflict of interest exists.

Roles and Responsibilities

Board of Directors

The BoD is responsible for:

- establishing an internal culture promoting compliance at all levels, including effective management of conflicts of interest; and
- ensuring the existence of an adequate Conflicts of Interest Policy.

When performing their duties and responsibilities BoD members should:

- ensure they act with independence of mind;
- proactively identify conflicts of interest and disclose such conflicts as required; and
- implement mitigating measures.

Management

Management is responsible for:

- promoting a culture emphasizing the importance of the fair handling of conflicts of interest and ethical treatment of clients;
- establishing and communicating the Conflicts of Interest Policy;
- setting internal regulations and procedures that ensure the implementation of the Policy; and
- overseeing the effective identification, documentation, escalation and management of conflicts of interest.

Staff

Staff members are responsible for:

- identifying, documenting, escalating and managing conflicts of interest on a day-to-day basis;
- familiarizing themselves with compliance requirements and the types of conflicts or improprieties that may occur within their areas of responsibility;
- being alert to events, transactions or behavior that could lead to conflicts of interest;
- implementing such processes and procedures that promote compliance with the Policy and ensuring that they are being adhered to;
- acting with integrity and exercising good judgement, objectivity and professionalism when discharging their duties;
- reporting any cases of conflicts of interest.

Compliance

Compliance is responsible for monitoring cases which could give rise to conflicts of interest, including:

- a. overview of the process
- b. receiving report of conflict of interest cases
- c. keeping a register of conflict of interest cases
- d. informing top management

Employee training

The Group provides training and information on conflicts of interest issues to all staff members in order to raise their awareness. Appropriate training is provided regularly to ensure that staff members are aware and understand their obligations under the legal and regulatory framework regarding conflicts of interest, as well as the Group's own policies and procedures.

Approving body and Policy approval

Unless material changes necessitate earlier revision, the Executive Board of Eurobank will first approve, then the Audit Committee will review and propose to the BoD the approval of the Conflicts of Interest Policy every year.

Reporting Conflict of Interest Cases

Staff or any other third party can contact Compliance through any of the following communication channels in order to report any cases of perceived, actual or potential conflicts of interest:

- Contacting the Head of Compliance; or
- Sending an email to the email address COMPLIANCEPERSONNELU@eurobank.gr

Eurobank takes all reasonable measures to protect any member of staff against any abuse or reprisals as a result of reporting reasonably held suspicions of non-compliance.