finora bank

Conflicts of Interest (COI) Policy Summary

Finora Bank is committed to integrity, objectivity, and fair treatment of all clients. **A conflict of interest (COI) is when a personal, financial, or other interest could influence—decisions made for clients or the Bank.**

Scope:

Applies to all employees, managers, members of the Supervisory Board, Audit Committee, Management Board, other bodies of the Bank, and their related persons.

Our principles

- **Responsibility:** Everyone must act to prevent and manage COIs.
- **Avoidance:** Avoid conflicts wherever possible.
- **Disclosure:** Conflicts (actual, potential, perceived) must be disclosed promptly.
- **Identification and management:** We assess and mitigate conflicts that cannot be avoided.
- **Documentation:** Potential/Real COIs and actions taken are recorded.
- **Objectivity:** Decisions are made on facts and client interests, not personal interests.
- **Fair treatment:** All clients are treated consistently and fairly.

Typical situations that may create COIs

- Personal relationships or interests affecting business decisions (e.g., approving terms for a relative).
- Outside roles or investments that overlap with Finora's business.
- Related-party dealings (e.g., contracts with a company owned by an insider).
- Governance situations (e.g., a board member involved in a decision where they have an interest).

COI's types:

- **Potential** (could arise),
- **Actual** (exist now), or
- **Perceived** (appear problematic to a reasonable observer).

Gifts and hospitality

- We do not accept or offer anything intended to influence decisions.
- Modest, proportionate, and transparent business hospitality may be acceptable.
- When in doubt, we seek prior clearance from Compliance or Legal functions, respectively.

How we protect clients and the Bank

- Early disclosure and independent oversight by the Chief Compliance Officer (CCO).
- Practical safeguards such as recusal from decisions, segregation of duties, enhanced monitoring, or declining an engagement.

- Central record-keeping for oversight and audit.

Accountability

- Breaches are addressed proportionately (from warnings and training to suspension of duties or mandates and regulatory reporting), depending on severity and impact.
- The Management Board and Supervisory Board hold ultimate responsibility for effective COI management.
- We review this policy at least annually and train our teams regularly.

Questions or concerns?

- **Contact:** compliance@finorabank.eu

Note: This is a public summary. The full Conflicts of Interest Policy prevails in all cases.