

bunq - Conflict of Interest

Policy

May 2023

To our Evas,

At bunq, we believe in transparency and having an inside=outside approach to our policies and procedures. We want to be fully transparent with our users and inform them of anything you may want to know. For this reason, we aim to make our policies publicly available, where we (legally) can!

bunq

BANK OF THE FREE

Summary

This document lays out the current policy and procedure of dealing with Conflicts of Interest within bunq.

- Section 1: The guiding principles of this policy and the responsibility each individual employee of bunq has to personally avoid and watch out for Conflicts of Interest;
- Section 2: The relevant definitions;
- Section 3: Who can be involved in a Conflict of Interest and (non-exhaustive) list of examples of Conflicts of Interest;
- Section 4: Lists existing measures that aim to prevent Conflicts of Interest;
- Section 5: Where to report a Conflict of Interest and what is the procedure after the report;
- Section 6: Who to contact with questions on the policy.


1 Introduction

Do you suspect that you or someone else may be in an actual or potential Conflict of Interest? This policy will guide you through understanding what a Conflict of Interest is (section 2), when it may arise (section 3), safeguards currently in place (section 4) and what happens if a Conflict of Interest arises (section 5).


bunq aims to serve Eva to the best of its ability, taking in mind relevant laws and regulations, and to guarantee their wellbeing. To achieve that, we must follow the applicable laws and regulations, such as the Section 3:10 and 3:17 of the Dutch Financial Supervision Act (“FSA”) and section 11 of the Decree on Prudential Rules FSA.


All employees of bunq have an obligation to disclose any potential or existing conflicts of interest that may affect them and prevent situations where their direct or indirect financial or personal interests (might) conflict with the interests of bunq. This Policy also applies to bunq BV and all of its branches and subsidiaries. This Policy can be complemented by annexes for local branches or subsidiaries that describe the local laws and regulations and/or processes where they differ from those described in this Policy.


Keep in mind! The Compliance Team, specifically Regulatory Compliance, is responsible for monitoring compliance with this Policy, **but** the manager(s) IT, Customer Support, and each employee individually is responsible for identifying, preventing, managing, and mitigating Conflicts of Interest.


To empower the Free, we must keep our company conflict-free 

2 Definitions

Conflict of interest : When a personal interest or activity - related to family, friendships, financial, or social factors - influences or appears to influence an individual's objectivity or ability to perform their responsibilities at the workplace.

Close Relatives : An employee's spouse, registered partner or other life partner, foster child, or (blood) relative up to the second degree (e.g. siblings, grandparents, grandchildren).

Employees : Includes workers with employment agreements and workers without employment agreements (such as a freelancer or temporary worker ("*uitzendkracht*")), working in bunq B.V and all of its branches and subsidiaries.

Compliance Officer : Officer appointed by bunq who is in charge of supervising compliance with this policy, under the Regulatory Compliance ownership.

3 When can a Conflict of Interest occur?

A Conflict of Interest may arise **between**:

1. bunq and a user (where the interests of bunq and the obligation it has towards a user are inconsistent or contradictory);
2. two or more users;
3. employees/board members of bunq and users;
4. employees/board members of bunq and bunq; and
5. the different activities within bunq.

There is a potential conflict of interest **when an employee**:

- Enters into competing activities with bunq;
- Conducts business with users or suppliers of bunq if it may lead to a Conflict of Interest or undermine bunq's reputation;
- Asks for or accepts (substantial) donations/preferential treatment from bunq for themselves or close relatives;

- Accepts invitations for any kind of entertainment from a business relation or potential business relation for themselves or a Close Relative insofar as it may lead to a Conflict of Interest;
- Provides unjustified advantages to third parties at the expense of bunq;
- Exploits business opportunities of bunq for themselves or for a Close Relative; or
- For personal purposes, makes use of labor and/or services of suppliers, contractors, real estate agents, maintenance services, and/or business services with whom bunq maintains substantial business relations;

There is a potential conflict of interest **when an individual:**

- Receives for themselves or their close relatives financial or other significant benefit because of their position at bunq;
- Can influence bunq's business, administrative, or other material decisions in a manner that leads to personal gain or advantage; or
- Has an existing or potential financial or other significant interest that affects or might affect the individual's independence in the discharge of their responsibilities within bunq.

*These lists are not exhaustive!

4 Preventative Measures in Place

bunq prioritizes the interests of our users, Evas, and is always watching out for possible conflicts of interest that can negatively affect them. Our starting point is that we need to prevent and avoid conflicts of interests as much as possible. bunq has rules and regulations in place to achieve that:

- **Code of Conduct:** lists the principles for conduct (Section 3 of CoC), additional occupations (Section 3i) and gifts (section 3k);
- **Regulation Private Investment Transactions:** contains rules and procedures on private investment transactions, treatment of price-sensitive information and prevents mixing of private and business interests;
- **Technical and functional Separation:** teams operating in bunq are separated to prevent transferring of confidential data between departments;
- **Remuneration policy:** this policy allows bunq to manage risk by incentivizing employees to keep the best interests of the company as priority;

- **Onboarding Package:** this policy is part of the Onboarding package, meaning each person that begins work at bunq must get familiar with this policy by reading it and checking it;
- **Rules of the Managing and Supervisory board:** both contain a Conflict of Interest provision.
- **Annual Update of Conflict of Interest Statements and Positions:** the Compliance team requires Management and Supervisory Board Members to provide Conflict of Interest statements and positions.

5 How to report Conflicts of Interest and What Happens

After

If you think that there is a (potential) Conflict of Interest that might significantly affect bunq and/or an employee, **please notify the Compliance Team via CIT/Legal**. There you can find a template of a Conflict of Interest Declaration which you can fill in with all the necessary information, specifically:

1. **who are the involved parties** (including, if needed, info on close relatives of the employee) and
2. **description of the potential Conflict of Interest.**

The Compliance Officer will assess whether there is a real Conflict of Interest and will notify the involved employees of their decision and, if there is a Conflict of Interest, what measures will be taken to manage it.

If the existence of a Conflict of Interest is verified then:

- If it involves a **user**: the user will be notified by an employee of the Customer Support department with details about the Conflict of Interest. They can make a decision on whether they approve of bunq's conduct;
 - bunq may refuse to act for the user involved.
- If it involves an **employee**: the relevant manager will be notified by the Compliance Officer, who will consult with the manager and decide how to deal with the Conflict of Interest;
- If it involves a **Board member of bunq**: the provision on Conflict of Interest of the rules of the managing board or the rules of the supervisory board will apply;

- If it's between **different activities of bunq**: the conflict will be escalated to the managing board;
- If it involves **the Compliance Officer**: the Legal Officer will assess whether the Conflict of Interest is real and inform the relevant employees of their decision;
- The necessary information barriers or other types of information separation will be put in place;
- The Compliance Officer will begin an investigation into what caused the conflict of interest and how to avoid or reduce similar conflicts in the future;

6 Questions ?

For any questions about this policy please contact the Compliance Team, specifically under Regulatory Compliance.