



BANK OF GREECE

EUROSYSTEM

THE EXECUTIVE COMMITTEE

Annex V

Potential material conflicts of interest

Conflict category	Period	Degree and type of connection and, where applicable, threshold
Personal	Current	<p>The appointee has a personal relationship:</p> <ul style="list-style-type: none">▪ with other members of the Board of Directors and/or key function holders at the institution, the parent undertaking or their subsidiaries;▪ with any qualifying shareholder of the institution, the parent undertaking or their subsidiaries; or▪ with clients, suppliers or competitors of the institution, the parent undertaking or the subsidiaries of the institution. <p>Where the appointee is involved in any legal proceedings or out-of-court disputes against the institution, the parent undertaking or their subsidiaries.</p>
Business, professional or commercial conflict of interest	Current or over the past two years	<p>Where the appointee has any business, professional (e.g. holding a management or senior position) or a commercial relationship with the institution, the parent undertaking or their subsidiaries; or with clients, suppliers or competitors of the institution, the parent undertaking or the subsidiaries of the institution; or has had, over the past two years, any such relationship with those entities.</p> <p>Whether these relationships are material will depend on what (financial) value they represent to the business of the appointee or his/her close relatives or such entities.</p>
Financial	Current	<p>Where the appointee has:</p> <ul style="list-style-type: none">▪ a material financial obligation towards the supervised entity, the parent undertaking or their subsidiaries (e.g. loans or credit lines);▪ a material financial interest (such as ownership or investments) in the institution, the parent undertaking or their subsidiaries; or in clients, suppliers or competitors of the institution, the parent undertaking or subsidiaries of the institution. <p>Whether the financial obligation or financial interest will be regarded as material will depend on the eligible capital¹ of the institution as well as other circumstances and mitigating factors applying to the specific case. The status of the loan as performing or non-performing, as well as the</p>

¹ In accordance with Regulation (EU) No 575/2013



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		<p>conditions under which the exposure was granted may also have an impact on the qualification of the loan as material in a specific case.</p> <p>The following shall in principle be considered material:</p> <ul style="list-style-type: none"> - financial obligations towards the institution that cumulatively exceed EUR 200,000 (excluding mortgages) or loans of any value which are not negotiated at arm's length conditions or are not performing (including mortgages); - and current shareholdings of more than 1% or other investments of equivalent value.
Political	Current or over the past two years	<p>Where the appointee, personally, has or has had over the past two years a position of high political influence, if this position is such that it exercises or appears to exercise undue influence over the appointee.</p> <p>A position of high political influence may be at any level, such as a local politician (e.g. mayor), a senior public employee, president of a political party, a member of cabinet or a member of a regional or national government.</p> <p>The materiality of conflicts of interest depends on the specific powers or obligations inherent in the political role, which would hinder the appointee from acting in the interest of the institution (e.g. taking part in public decisions regarding the institution, the parent undertaking or their subsidiaries).</p>

THE SECRETARY

THE MEMBERS

THE CHAIRMAN

Yannis Stournaras

True and Exact Copy

Athens, 18.01.2024

The Secretary

[signed]

I. Pantou