

Declaration of Interests

By members of the EFTERM Oversight Committee

EMMI adopted a Conflicts of Interest Policy and Conflicts of Interest Procedure in order to identify, prevent and manage any actual or potential conflicts of interest and to protect the integrity of the process for the determination, calculation and publication of the EFTERM benchmark.



EMMI understands 'conflict of interest' to be defined as follows:

An actual conflict of interest refers to a situation where the impartiality and objectivity of a decision, opinion or recommendation of a body or a person is compromised by a personall interest held by or entrusted to a given individual.

A perceived conflict of interest refers to a situation where the impartiality and objectivity of a decision, opinion or recommendation of a body or a person might be perceived as being compromised by a personal interest held by or entrusted to a given individual, even if in fact there is no such undue influence.

A conflict of interest situation may arise in particular as a result of a business activity, an economic interest, company ties, or any other relevant connection or shared interest.

¹ A relevant personal interest may be of a financial or non-financial nature and may concern a personal or family relationship (spouse, legal partner, parents, or children) or a professional affiliation (including additional employment or « outside » appointments or former employments or appointments) or other relevant outside activities.



I, the undersigned, Alberto Covin, Member of the Committee, confirm that:

\checkmark	I am appointed on a personal basis, and I am not subject to instructions from UniCredit, the company/organisation with which I am affiliated.
\checkmark	I have confirmation by the company/organisation with which I am affiliated that it will not instruct me with respect to my function as a member of the Committee.
✓	I have read, understood and agree to comply with EMMI's Conflicts of Interest Policy, EMMI's Conflicts of Interest Procedure and EMMI's Confidentiality Policy.
	I have personal relations with the following Members of the Committee, the EMMI governing bodies and/or of EMMI Staff:
	I do not have any personal relations with Members of the Committee, the EMMI governing bodies and/or of EMMI Staff.
	I have the following additional interests to declare (if any):
	I have loans, capital shareholdings, warranties, or any other financial interest referenced to EFTERM or to, generally speaking, euro interest rate benchmarks, that can be considered material.
\checkmark	I have no loans, capital shareholdings, warranties, or any other financial interest referenced to EFTERM or to, generally speaking, euro interest rate benchmarks, that can be considered material.
\checkmark	I have no other relevant interest to declare other than the ones disclosed above.
\checkmark	I hereby commit to step out of the relevant agenda item of each meeting when there is a risk of conflict between my own interests, or of those I am affiliated with, and EMMI's interest.
\checkmark	I declare that the disclosed information is correct. I undertake to immediately inform EMMI of any change in my interests.
\checkmark	I am aware that, by making a fraudulent declaration: (i) I am exposing myself to legal actions/consequences and (ii) such a fraudulent declaration can be used in legal proceedings.
Name and position: Alberto Covin, Head of FMI Strategy	
Date: 4th November 2022	



Signature:

Enclosures: EMMI Conflicts of Interest Policy
EMMI Conflicts of Interest Procedure
EMMI Confidentiality Policy

