

# Declaration of Interests

By members of the EURIBOR 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 EURIBOR 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 personal<sup>1</sup> 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.*

An actual or a perceived conflict of interest constitutes a reputational risk to EMMI and the EURIBOR benchmark, as it can raise doubts about the process for the determination, calculation and publication of the EURIBOR benchmark. A perceived conflict of interest should be treated as if it were an actual conflict of interest.

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. Potential conflict of interest situations which could arise among EURIBOR Oversight Committee Members (hereafter 'Committee') include, but are not limited to:

- Members from the Committee, who are directly or indirectly affiliated with panel banks, could be perceived to influence the EURIBOR benchmark definition, the Code of Conduct review, or the Code's compliance decisions for the benefit of their own panel bank or of the panel banks as a group.
- Members from the Committee, who are directly or indirectly affiliated with panel banks, could be perceived to have an interest not to challenge daily or periodic submissions as they might benefit from financial payments linked to the rate(s) of the EURIBOR benchmark.
- Independent or non-panel bank Committee members could influence the development of the EURIBOR benchmark definition or the application of the Code of Obligations for Panel Banks for the benefit of their organization or representative class.
- Members from the Committee, who are directly or indirectly affiliated with panel banks, and independent or non-panel bank members may gain access to confidential market information, that could benefit their own organization.

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<sup>1</sup> 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, MANUELA GERANIO Member of the Committee, confirm that:

- I am appointed on a personal basis, and I am not subject to instructions from University of BERGAMO, the organisation with which I am affiliated.
- 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 interests to declare for the preceding 18 months and for the next 6 months:
  - Employee of or otherwise directly or indirectly affiliated with the following bank or panel bank .....
  - Submitter of the EURIBOR index
  - Other (please describe)
- I have loans, capital shareholdings, warranties, or any other financial interest referenced to EURIBOR or to, generally speaking, euro interest rate benchmarks, that can be considered material.
- I have no loans, capital shareholdings, warranties, or any other financial interest referenced to EURIBOR or to, generally speaking, euro interest rate benchmarks, that can be considered material.
- I have no other relevant interest to declare other than the ones disclosed above.
- 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.
- I declare that the disclosed information is correct. I undertake to immediately inform EMMI of any change in my interests.
- 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: MANUELA GERANIO, Associate Professor University of Bergamo

Date: 27<sup>th</sup> October 2022

Signature: 

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