

Conflict of Interest Policy

Introduction

In our conflicts of interest policy we have defined what conflicts of interest are, what we do to prevent them and how we handle (potential) conflicts of interest. Here's the summary.

What is a conflict of interest?

If acting in the interest of one is detrimental to the interests of other(s), there's a conflict of interest.

When could a conflict of interest arise?

A conflict of interest could arise when:

- your interest conflicts with ours;
- your interest conflicts with the interest of one or more other bunq customers;
- conflicting interests exist within bunq, for example between employees or with companies that work for us.

How do you prevent conflicts of interest?

To prevent conflicts of interest we have, among other things, taken the following measures:

Code of conduct

With our code of conduct, we try to prevent from getting into a conflict of interest. This means, among other things, that our team members are required to report activities outside of bunq and forbidden from accepting gifts and hospitalities.

Information exchange and functional separation

We have technical and functional separations in place to prevent conflicts of interest. These separations minimise the risk of a conflict of interest by limiting and regulating the exchange of confidential information.

Awareness

All our colleagues are trained and stimulated to recognise, prevent and (if necessary) properly handle conflicts of interest.

What do you do in case of a (potential) conflict of interest?

Every team member is required to report (potential) conflicts of interest. We have a reporting procedure for this purpose. When we receive a report, we start an investigation and if it turns out there is a conflict of interest we:

- inform all stakeholders;
- may decide to take additional (temporary) measures;
- evaluate whether we can take additional measures to prevent similar conflicts in the future;
- may decide to refuse or discontinue our services to a customer.