



Conflict of Interest Group Policy

1. Purpose

The policy's main objective is to set out general principles in order to ensure that the Group has established implements and maintains effective COI procedures and arrangements for the prevention, identification, documentation, escalation and management of COI and to comply with the legal and regulatory framework.

Failure to identify, escalate and appropriately manage actual or potential COI and to comply with relevant rules may expose the Group, the Board of Directors and its employees to criticism, fines, penalties, or may lead to increased indirect costs and may result in damage to the Group's reputation.

2. Sectors Affected

This policy applies to the Members of the Board, Senior Management and all employees of the Group in every country the Group operates, as well as, in relationship with the Group's contractors, agents and other Relevant Persons (see section 4 Definitions).

All entities of the Group must, as a minimum meet the requirements of this policy. In any country where the requirements of local legislation, directives or practices establish a higher standard, the corresponding Group Entity should follow those standards.

3. Policy

General Principles

BOC Group conducts its business according to the principle that it must manage COI fairly, both between itself and its clients and between one client and another.

A. Identification of COI

The Group sets procedures in order to identify the relationships, services, activities or transactions in which COI may arise. These procedures cover relationships:

- a) Between the Bank and its stakeholders, including:
 - (i) Customers
 - (ii) Shareholders
 - (iii) Members of its management body (Executive and Non-Executive)
 - (iv) Members of staff
 - (v) Significant business partners and other external stakeholders
 - (vi) Other related parties, such as its parent undertaking or subsidiaries; and

(b) Between different clients of the Bank.

All Bank stakeholders and especially Members of the management body, Senior Management and all Employees have a personal responsibility to disclose any COI and abstain (or take relevant measures) from a transaction that may involve a COI. This responsibility is explicitly stated in the



Code of Conduct (part of the Employee Handbook), the Board Manual and other agreements with various stakeholders, service providers, suppliers etc.

B. Examples of COI

Within a financial institution COI may arise in a variety of situations. Possible areas include:

- Portfolio management
- Investment services
- Corporate banking
- Personal accounts
- Loan Restructuring
- Sale of Loans

A non-exhaustive list of common types of what may be considered as COI can be found in *Appendix A*:

C. Managing COI

All COI should be managed pro-actively, promptly and fairly. As a minimum the following organizational, procedural and administrative arrangements should be adopted to prevent, identify or manage COI:

I. Corporate Governance

The Bank maintains a corporate governance framework aligned with international standards and legal requirements. This is achieved through well defined, transparent and consistent lines of responsibility and authority limits and clear reporting lines which are documented in the Board Manual and its appendices.

All members of the management body and other obliged persons will be asked to self-assess each year and submit their questionnaire to Compliance Division which will then carry out its own assessment before submitting a report to the NCGC. (See Managing COI procedure attached as *Appendix C*.)

II. Executive/ Operational Bank Committees

All members of the Executive and other internal Committees must disclose any COI and abstain from participating in the decision-making or from voting on any matter where they may have a COI

(a) Prior to the commencement of any meeting of such committees the acting chairperson of the meeting is required to read all items on the agenda and request that each participant, including himself/herself and the members of such committees, states clearly whether there is an interest or a COI or a potential COI and if so to take all relevant measures to mitigate the possibility of crystallization of any such potential COI.

(b) Any member of these Committees should make sure that he/she strictly adheres to the provisions of this Policy and declares such a perceived/potential conflict when discussing an item coming from his/her direct RRD sector. At the same time, the secretary of any of these Committee should assess, and the Chairperson of the Committee should ensure / decide, depending on the cases to be discussed and the risk that each case entails (monetary or not), whether, to the best of their knowledge, the presence of a member may constitute a potential or perceived COI due to their role and should take relevant mitigating measures. i.e. if a COI is identified for an item on the agenda then the member



involved must leave the room without participating in the discussion and the voting for that particular item either in person or via proxy.

In the case of Credit Committees and the ADC:

- i) any representative of a Line requesting the restructuring of a loan, can only present the case without participating in the voting process either in person or via proxy.
- ii) If a Committee member was involved in the original approval process of a loan and this loan was subsequently brought to the Credit Committee for any form of restructuring, then this member is not conflicted provided a) he or she declares their original involvement and that they have no interest or COI and b) the Credit Committee at the time of original approval followed proper governance and conducted proper analysis of the case.
- iii) A Committee member who was in the original Committee that approved the loan and is also a Committee member reviewing a subsequent restructuring of the same loan, is not conflicted provided a) he or she declares their original involvement and that they have no interest or COI and b) the Credit Committee at the time of original approval, followed proper governance and conducted proper analysis of the case.

(c) In the case of a single approving authority then any subsequent restructuring should be approved by a different authority.

The above should be recorded in the respective meeting minutes.

III. Group entities

Appropriate controls are in place to identify and manage COI among Group entities and other business entities related to the Group. Additionally, periodic reviews are performed on the adequacy of the system of internal controls.

The Group considers and balances the interests of all of the subsidiaries, assessing how these interests contribute to the common purpose and interests of the Group as a whole.

IV. Independence, separate supervision and distinction of operations

The Group operates a clear structural segregation of business divisions and legal entities to allow for the independent running of businesses and takes organizational measures to ensure separate supervision and distinction of its employees' operations in order to avoid possible COI.

Each business division reports to a Director on the Executive Committee who is responsible for overseeing and managing the business division.

The Bank also operates an internal control system underpinned by the Three Lines of Defense. Business lines are the first line of defense. Risk Management and Compliance functions are the second line of defense. the Internal Audit function which provides a level of independent assurance that the risk management and internal control framework is working as designed is the third line of defense.

V. Information Barriers and Chinese Walls

The Group respects the confidentiality of information about its clients and complies with all applicable laws with respect to the handling of the information. Access to confidential information



is restricted to those who "need to know" and is consistent with the legitimate interest of a client or the Bank.

The Group maintains information barriers also known as "Chinese Walls". Chinese Walls are put in place to restrict information flows between different areas of the Bank. The application of Chinese Walls provides the Group and its employees with the possibility to offer clients services without being affected by other information possessed by the Group which could result in COI that may harm the interest of a client.

VI. Inducements and Research independence

This policy should be read together with MiFID Conflicts of Interest Policy where inducements and research may create COI.

Research publications /recommendations are internally distributed exclusively at the same time as they are distributed to the clients.

VII. Relevant persons

An approval process is in place to identify and manage cross-board memberships and outside business interests of Relevant Persons.

Relevant Persons may be asked to step aside from working on a specific transaction or participating in the management of a COI, where necessary.

Relevant Persons are subject to personal account transaction rules; the following rules apply with regard to the personal transactions of the Relevant Persons:

- Every Relevant Person is aware of the restrictions on personal transactions, and of the measures established,
- The Group is informed promptly of any personal transaction entered into by a Relevant Person,
- A record is kept of the personal transaction notified to the Group or identified by it, including any authorization or prohibition in connection with such a transaction,
- Proper measures are in place to ensure compliance with relevant market abuse obligations in relation to all financial instruments for which the Bank is an issuer.

A Relevant Person cannot:

- Enter into a Personal Transaction which meets at least one of the following criteria:
 - (i) that person is prohibited from entering into it under the Market Abuse regulatory framework,
 - (ii) it involves the misuse or improper disclosure of confidential information
 - (iii) it conflicts or is likely to conflict with an obligation of the Group under the Market in Financial Instruments Directive (MiFID, Directive 2014/65/EU).
- Advise or procure any other person to enter into a transaction in financial instruments which, if it was a personal transaction of the relevant person, would be forbidden.
- Disclose any information or opinion to any other person if the Relevant Person knows that the other person, will or would be likely to take either of the following steps:



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- (i) Enter into a transaction in financial instruments, which if a personal transaction of the Relevant Person would be forbidden under the applicable legislation,
 - (ii) Advise or procure another person to enter into such a transaction.

VIII. Group-Wide Dealing Policy

All Directors and Employees:

- Can engage in financial instrument transactions, given that they fall within the context of so long as they are allowed by the legislative and regulatory framework, as well as professional ethics and comply with the Group-Wide Dealing policy and relevant Group policies and procedures.
- Must not deal in any BOC securities if they are in possession of inside information relating, directly or indirectly to BOC securities and/or securities of the Group's customers, and which, if they were made public, would be likely to have a significant effect on the prices of these securities.
- Must seek approval from the Group CEO before executing a transaction by filling in the appropriate form, as per the BOC Dealing Code.
- Must not unlawfully disclose any confidential information about the Group or other group of companies, except where they are required to do so as part of their employment or duties

IX. Vendors

The Bank's Procurement policy governs the management of relationships with vendors and all employees are expected to comply with it

The Bank ensures there are arrangements in place that prevent persons who are active outside the Group from having inappropriate influence within the Group regarding conflicting activities.

All persons are expected to recognize when they have, potentially have, or could be perceived as having, a COI. All persons should consult the Bank if in doubt about what circumstances might create a COI.



X. COI and Outsourcing

The Bank exercises appropriate due diligence when selecting outsourcing service providers which includes:

- The identification of any COI or potential COI due to the fact that the outsourcing service provider constitutes a group of connected persons with:
 - Any member of the Group's senior management or management body
 - The Bank's external auditors or
 - The Bank's external legal advisors

XI. Sale of Loans

The Bank should establish appropriate measures to ensure that all possible COI that may arise from the sale of loan process are properly identified and managed. This entails the proper identification and management of all possible COI risks during the negotiations, before the agreement, during the process of transfer of accounts, resources etc. as well as after the completion of the agreement. Such additional procedures should include:

- i. All sale of loan transactions are required to be conducted at arm's length, all internal control procedures to fully apply to these transactions, binding and relevant approvals from the Management Body to be obtained etc.
- ii. Members of the Management Body or Senior Staff should refrain from holding directorships or other executive positions in institutions connected with the buyer. All cases should be identified and properly managed and should be handled at Management Body level e.g. if an exception is required.
- iii. When the Bank takes the decision to initiate a sale of loan transaction a proper project governance structure should be established taking into account all the provisions of this policy. This should include:
 - A steering committee to be established in the context of the required confidentiality and all members should declare possible or actual COI and record them in the respective meeting minutes. External or conflicted persons (i.e. persons that have declared a COI) should not be permanent members of the committee and should participate only by invitation.
 - A COI registry of all possible COI relating to the specific sale of loan transaction should be maintained in the required confidence and with relevant measures and controls in place.
- iv. Before a contract is signed and during the negotiations of the contract with a third party possible conflicts should be examined and all parties should have the responsibility to declare possible/ potential or actual COI to the other party. This obligation should be reflected in the clauses of all contractual agreements such as the sale agreement and the NDA agreements as well as in the after sale services agreement if such agreement will exist.
- v. When the buyer or potential buyer wishes to contract with sub-contractors (consultants, auditors, lawyers etc.) the consent of the Bank as to the contractors selected maybe necessary to avoid possible conflicts. Also access to confidential privileged information to such parties should be given with care and extra due diligence and relevant market abuse Bank policy procedures should be followed.
- vi. In cases that there is an agreement for the operation of the accounts post sale, measures should be in place to manage COI of sub-participation accounts and anticompetitive process and communications should be strictly avoided.



- vii. In cases where the gradual transfer of a portfolio involves also the transfer of human resources, robust COI measures and a proper governance framework will be put in place aiming at the early identification and mitigation of obvious, perceived or potential conflicts of interest. The framework will be decided based on the circumstances of each case but, in general, it is expected to include measures such as the application of cooling period, signing of NDAs etc.
- viii. In cases where the sale of loans agreement provides for a potential temporary transfer of a member of staff, measures as described in section XIV of this policy in relation to past relationships should apply.

XII. COI at the Management Body

Members of the management body must act in the best interest of the Group and must ensure that transactions between the Bank and/or other Group entities are generally undertaken only on an arm's length basis.

- A Procedure has been set whereby all Members of the management body provide annually, a self-assessment to Compliance which then carries out its own assessment to ensure all COI are identified and all relevant guidelines/compliance requirements of the regulatory framework applicable to the territories that the Group operates are taken into account.
- A review and consent process is in place which the Members of the management body must follow before they engage in certain activities such as serving on another entity's management body, to ensure such new engagement would not create a COI.
- Members of the management body should refrain from holding directorships in competing institutions, unless they are within institutions that belong to the same institutional protection scheme, as referred to in Article 113(7) of Regulation (EU) No 575/2013 (and subsequent amendments), credit institutions permanently affiliated to a central body, as referred to in Article 10 of Regulation (EU) No 575/2013, or institutions within the scope of prudential consolidation.
- Members must disclose any COI and abstain from participating in the decision-making or in voting on any matter where they may have a COI. (a) Prior to the commencement of any meeting, the acting chairperson of the meeting is required to read all items on the agenda and request that each participant, including himself/herself, states clearly for each item on the agenda states clearly whether there is an interest or a COI or a potential interest or COI or not. (b) If a COI is identified for an item of the agenda, then the member involved must leave the room without participating in the discussion and in the voting for that particular item, either in person or via proxy. (c) The same procedure applies for other /ad hoc issues.
- Adequate procedures should be established for transactions with related parties, (e.g. requiring transactions to be conducted at arm's length, requiring that all relevant internal control procedures fully apply to such transactions, requiring binding consultative advice from independent members of the management body, requiring the approval by shareholders of the most relevant transactions and limiting exposure to such transactions).

XIII. Shareholders

Transactions or arrangements entered into between the Bank and material shareholders of the Bank need to be made on an independent arms-length basis, and in compliance with applicable rules.



XIV. All Employees

Employees are responsible for identifying and managing COI on an ongoing basis and the Bank requires that all employees:

- i. Comply with this policy, rules and other applicable policies and procedures relating to the identification, documentation, escalation and management of COI.
- ii. Act with integrity and exercise good judgement and discretion in line with the Code of Conduct.
- iii. Avoid situations giving rise to COI wherever possible and not allow:
 - personal financial interest;
 - Family Members or Close Personal Relationships;
 - previous, current or potential future involvement (whether at the Bank or externally) in an activity or endeavour; or
 - different roles and responsibilities at the Bank,to compromise or otherwise call into question their judgement, ability to act objectively or properly discharge their duties and responsibilities owed to the Bank and/or clients, or otherwise give rise to the risk of reputational damage to the Bank including the risk of the appearance of impropriety around the manner in which business is awarded to or by the Bank or of the Bank having obtained an improper advantage or treatment.
- iv. Immediately notify their supervisor and/or Compliance of the existence and general nature of an actual or potential conflict of interest.
- v. COI may arise not only from present but also from past personal or professional relationships. Where COI arise, the Group should assess their materiality and decide on and implement appropriate mitigating measures. COI that may result from past relationships should be reported for a period of three years if these may potentially have an impact on staff's behavior and participation in decision-making.

XV. Refusal to provide a service/disclosure to Clients

Where the Group cannot prevent or successfully manage a COI situation:

- (a) It is possible that the Group will refuse to provide the requested service or
- (b) Where confidentiality considerations permit, will disclose the general nature and/or sources of COI as well as the risks to the client before undertaking the business. The disclosure should be sufficiently detailed to enable the client to make an informed decision and the client's consent must be obtained in writing.



XVI. Gifts and personal benefits

The accepting and offering of gifts and other personal benefits is regulated by the relevant policies and procedures of the Bank (Code of Conduct & Anti-Bribery policy). Members of staff are allowed to accept gifts of small value as per circular OE148. A gift registry should be maintained at local level and all gifts received and offered irrespective of amount should be registered.

XVII. Training and Communication

The Group provides constant training and information in relation to matters of COI in order to build awareness around COI and develop the knowledge and understanding of employees and promote a culture of transparency.

XVIII. Remuneration Policies

The Bank recognizes that remuneration is a factor that may influence the conduct of Employees. The Bank has in place remuneration policies and procedures which set out appropriate governance to prevent remuneration structures which may incentivize an Employee to act contrary to their responsibilities, regulatory requirements or the Bank's Code of Conduct. Remuneration policies for Group employees prohibit situations that will give or potentially could give rise to COI, e.g. profit share, success fees etc.

D. COI Registry

The Group maintains a register of the activities carried out by the Group which have given or could give rise to a COI as per circular OE.148. The information contained within the Banks Conflicts of Interest Register facilitates the effective identification, escalation and management of potential conflicts of interest and provides a basis for accountability and monitoring implementation of the policy.

E. Implementation Procedures

In addition to this Group policy, every entity of the Group should draft and implement specific procedures/manuals for the implementation of this policy.

F. Reviews

There is a periodic review of the adequacy of the Bank's systems and controls in relation to COI.

G. Reporting

COI arise all the time, and there are many "grey areas" where it is often hard to discern whether there is a real or potential COI. The appearance or perception by others of a COI can often be as detrimental as a COI. It is therefore important that Group Employees be alert to situations that could lead to COI. Promptly disclosing and dealing with any conflict is critical to avoiding potentially serious consequences for the effectiveness and integrity of the Group. It should be emphasised that even if in doubt the possibility of a COI should be reported.

The Group encourages its employees to report any activity that may violate this policy. If any member of staff becomes aware that a conduct which has taken place is in breach of the provisions of this policy, they have a duty to report it. Any such incidents should be reported to a Supervisor/



Line Manager or via the Whistleblowing line. Omitting to report violations of this policy can be considered as a disciplinary offence.

The CD will submit a report to the NCGC once it completes its own annual assessment following the submission of the self-assessments from obliged persons.

H. Breach of this policy

Breaches of this Policy will not be tolerated and can lead to disciplinary measures.

Non-compliance issues will be assessed according to their materiality and impact on the Groups reputation and relevant measures will be put in place to take into account ~~also~~ the impact on the capital adequacy and liquidity of the Bank.

4. Definitions

Conflicts of Interest: A COI arises when two or more persons have competing interests and a duty of care or trust exists between the persons. It can arise in any area of the Group's operations during the provision of services to a client and which could be in favor of the interests of the Group or of the interests of any relevant person or of the interests of any other client and may be against the interests of the first client. COI broadly: (a) actual conflict- there is a real, existing conflict (b) potential conflict- there is or could be a situation that may result in a conflict and (c) perceived conflict – there is or could be a situation that may appear to be a conflict even if this is not the case

Chinese walls: A Chinese wall is an established arrangement or series of arrangements, whereby confidential/sensitive information held by employees in one part of a Group entity is kept secret from individuals in other parts of the Group entity. This enables divisions of the same Group entity outside the particular Chinese wall to operate without regard to the information held within it.

Clients: The definition includes (a) existing clients of the Bank (b) potential clients (c) past clients where fiduciary or other duties remain in place.

Inside/ Confidential Information: Information which has not been made public, relating directly or indirectly, to one or more issuers of financial instruments and which if it were made public would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments. This information includes any information that a reasonable investor may take into account when making his/her investment decision. Regarding the persons who are charged with the execution of orders concerning financial instruments, confidential information is considered as the information provided by a client regarding pending orders, which are directly or indirectly related to one or more issuers of financial instruments and which if made public would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments. To facilitate the implementation of this principle the Group has issued (a) the Group-Wide Dealing Policy and (b) the Dealing Code.

Obligated Persons

- Members of the Board
- Divisional Directors reporting directly to ExCo
- Other Divisional Directors



- Any other position that creates or may create potential COI as well as, in relation with the Group's contractors, agents and other Relevant Persons (see section 4 Definitions).

Personal Transactions: Trade in a financial instrument effected by or on behalf of a Relevant Person, where that Relevant Person is acting outside the scope of the activities he/she carries out in that capacity and the trade is carried out for the account of the Relevant person or any person with whom he/she has family relationship or close links and the trade is forbidden under the Market Abuse framework or the trade will result to the abuse or the improper disclosure of confidential / inside information or could be in breach of the legal obligations of the Group.

Relevant persons: A Member of the management body, Manager, Employee, Partner or any person that is participating to the provision of services by the Group which due to his/her position or due to his /her participation to certain Group Services or due to his /her relationship with the Group has access to specific information that is not widely known and his/her involvement in such services may rise to a conflict of interest.

5. Roles & Responsibilities

All responsibilities should be clearly assigned, explained and monitored (please refer to *Appendix B*).

6. Legal & Other Framework

- Directive to Credit Institutions on Governance and Management Arrangements in Credit Institutions 2014.
- The law which provides for the provision of investment services, the exercise of investment services, activities, the operation of regulated markets and other related matters Law 87/17.
- Cyprus Securities and Stock Exchange Law 14(I)/93
- EU Regulation 596/2014 on Market Abuse (Market Abuse Regulation, MAR).
- Any laws that relate to the management of COI.
- Group Policies: Code of Conduct, Anti- Bribery, Fraud, Group Wide-Dealing Policy, Board Manual, MiFID Conflicts of Interest, Corporate Governance Policy, Procurement Policy, Inducements and Fees Policy, Whistleblowing Policy etc.



Appendix A

Non-Exhaustive List of common types of what may be considered as COI

COI relating to clients can be broadly described as scenarios where the Bank, an Employee or a third party representative:

- i. Might have a financial gain or avoid financial damage at the expense of the client
- ii. Has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is different from the interest of the client in that outcome.
- iii. Has a financial or other motive to favour the interests of a client or group of clients at the expense of the interest of another client.
- iv. May engage in business and trading activities for its own account and/or client accounts whilst other clients are active in relevant markets.
- v. May receive or provide substantial gifts or entertainment that may influence behavior in a way that conflicts with the interests of the Clients of the Bank (e.g. entertainment or hospitality the cost of which is in excess of what is considered reasonable and accepted business practices).
- vi. Has a financial or other incentive to favour the sale of a particular product or service to a client which is not in the best interest of the client
- vii. An entity of the Group may provide investment advice or discretionary portfolio management services to its clients and the Bank may also recommend or sell products issued by itself or affiliated companies.
- viii. Uses his position for personal gain or benefit be it a Member of the management body, Manager, Officer or Employee.

COI relating to the Bank can be broadly described as scenarios where:

- i. An Employee's interest in the outcome of a particular activity or transaction differs from the Bank's interest;
- ii. An Employee (or family member) receives a financial or other significant benefit as a result of the employee's position at the Bank which is inappropriate in nature
- iii. An Employee has the opportunity to influence the Bank granting business or making administrative or other material decisions in a manner that leads to personal gain or advantage for the Employee or a family member,
- iv. An Employee's existing financial or other interest or previous engagement in a transaction or activity or relationship with another person, impairs or could impair his/her judgment or/and objectivity in carrying out his/her duties and responsibilities to the Bank
- v. A unit of the Bank favours its interest over another unit of the bank which is inconsistent with the best interest of the Bank including in connections with the selection of vendors or
- vi. A COI arises in connection with a transaction or arrangement entered into between the Bank and a material shareholder or between Group entities due to the close relationship between the parties.
- vii. Members of staff that were involved in the loan granting decision are also involved in a decision relating to the restructuring of that loan.



Appendix B

RESPONSIBILITIES IN RELATION TO COI

Board of Directors	The Board of Directors is responsible to monitor compliance with the policy. Furthermore it is responsible for informing the CBC where non-compliance with the policy (with regard to Members of the Board) occurs.
The NCGC	<ul style="list-style-type: none"> • The Nominations and Corporate Governance Committee is responsible: • To approve the policy • To examine and approve a member serving on the board of another entity to ensure that any such Board memberships do not create a COI. • To review the report submitted by CD
Line Managers	Line Managers have the ultimate responsibility for the implementation of this policy and need to enforce with the support of the control functions measures to adhere to this policy. They should maintain a register of any cases of COI arising from the activities of their departments (at a local level).
Human Resources	<ol style="list-style-type: none"> 1. Incorporate anti-bribery and corruption principles to the Code of Conduct and Ethics 2. Ensure proper COI controls are in place with regards to selecting and appointing new employees. 3. Train employees on anti- bribery and corruption issues. 4. Design and implement disciplinary procedures.
Compliance	Compliance Division should: <ul style="list-style-type: none"> • Provide training to staff with regard to this policy. • Review self-assessments of COI by members of the management body and ExCo and carry out its own assessment.
Internal Audit	Internal Audit in accordance with its risk based approach carries out periodic reviews of relevant controls & procedures in relation to the management of COI, in order to provide assurance as to the effective implementation of the provisions of this policy.
Obligated persons	Complete a self-assessment annually or whenever a potential COI occurs and submit to CD
Organisation Department	Organisation Department should drive and coordinate the maintenance and updating of the procedures as set out in circular OE148.
All relevant persons, Senior Management and staff	Senior Managers are responsible to put in place a framework and implement procedures and controls to identify, escalate and manage COI. Every employee is responsible for identifying and escalating potential COI so that they may be appropriately managed and resolved. All must adhere to the rules of this policy

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