

Regulation on the independence of DNB employees 2026

Contents

1. Introduction	3
2. Conflicts of interest	3
Principles avoiding the (appearance) of conflicts of interest	3
Notification requirement to manager and compliance officer	4
Decision	4
3. Incompatible activities	5
Principles of incompatible (ancillary) activities	5
Notification requirements secondary activities and other activities & cooling off	6
Decision	8
4 Benefits, invitations and meetings with financial sector representatives	9
Principles benefits	9
Principles invitations	10
Meetings with financial sector representatives	11
Quiet period for employees involved in monetary policy meetings	11
Notification requirements	11
Decision	112
5. Final provisions	12
Decision	12
Effective date	12
6. Definitions	13

Regulation on the independence of DNB employees 2026

(conflicts of interest, (secondary) activities, benefits, invitations and meetings with representatives from the financial services sector)

1. Introduction

The Regulation on the independence of DNB employees (the Regulation) is based on the principle of independence as set out in DNB's Code of Conduct: 'We take an independent position. We base our performance on objectivity and professionalism. We take the utmost care to avoid actual or potential conflicts of interest.'

It is of great importance for DNB's reputation, effectiveness and credibility that its employees act independently. Therefore, it is important that employees are aware of the risks that could put their integrity into question. Employees must prevent their personal interests from conflicting with the objective and independent performance of their duties or with DNB's interests. They must treat their fellow employees and other relations as equals, maintain a professional distance, and must not use their business contacts to unfairly benefit others or themselves. They must always stay alert to any actual, potential or perceived conflicts of interest, and notify DNB immediately should such a conflict arise. In that case, the employee must inform their manager and the compliance officer.

Scope of application

The Regulation applies to all employees as defined in Article 6. With the exception of Chapter 4, the Regulation also applies to prospective employees as defined in Article 6.

The provisions of this Regulation apply to employees from the start of employment or work for DNB as an employee or (whichever is earlier) from the moment undisclosed information is shared with them. With regard to prospective employees, the provisions of this Regulation referred to in the previous paragraph shall apply to them from the moment the contract for the performance of work is signed and/or the onboarding process begins.

The provisions of this Regulation remain in force for employees during (unpaid) leave or external secondments, unless otherwise agreed with the compliance officer.

In case of questions and/or notifications under this Regulation, please contact the compliance officer (via extension 3838, compliance.officer@dnb.nl or via MijnHR).

2. Conflicts of interest

Principles

2.1

Employees must avoid any situation that gives rise or could give rise to an actual or perceived conflict of interest.

Notes: You must prevent your personal preferences and interests from conflicting or appearing to conflict with the objective and independent performance of your duties or with DNB's interests. Conflicts of interest may arise from advisory work on policy matters or internal decision-making processes, for example in the case of a file relating to recent previous employers or organisations in which a personal associate holds a policymaking position or shares. You must also be aware that your private dealings and private relationships may give rise to an actual or perceived conflict of interests. Examples include a situation in which you are involved in a tender for

construction work at DNB while also having refurbishment work carried out in your own home by the same contractor. Should such a situation arise, you must report it to your manager and the compliance officer (see Article 2.4.1), after which an assessment will be made of the risks to DNB and whether control measures are required.

2.2

Employees are not permitted to be involved directly or indirectly in transactions of material significance to DNB with:

- a. a related third party of the employee;
- b. a legal entity in which the employee or a related third party of the employee has a financial interest;
- c. a legal entity of which a board member is a related third party of the employee;
- d. a legal entity in which the employee holds a position in which they determine or co-determine policy.

Notes: This prohibition means that you must be alert when entering into transactions or agreements between DNB and related third parties, such as your parents, children, siblings or close friends. If DNB intends to enter into a transaction with a party in which your relative or friend is involved, you must cease to act for or on behalf of DNB in that transaction. An example is engaging a training firm owned by a relative or hiring staff from a firm in which your partner is a board member. This prohibition does not apply to transactions of minor importance and of limited value.

2.3

Employees are not permitted to effect or instigate a transaction for their own account or on behalf of one or more third parties on the basis of non-public information known to them by virtue of their work or position.

Notification requirement

2.4.1

Employees must immediately notify their manager and the compliance officer of any actual or potential conflicts of interest, stating the relevant circumstances.

2.4.2

Prospective employees must also inform their future manager and the compliance officer of any actual or potential conflicts of interest before taking up their duties.

Notes: Examples include personal relationships, financial interests, previous professional activities or private activities). See also the notes to Article 2.1 and Section 3.

Decision

2.5

After consultation with the employee's manager, the compliance officer will decide whether an actual or perceived conflict of interest is involved and may impose conditions to avoid conflicts of interest. The compliance officer will notify the employee and the employee's manager of the decision and any associated conditions.

Notes: an actual or potential conflict of interest can sometimes be avoided by taking certain measures. Examples include modifying the duties of an employee who has a personal interest in

an institution under their supervision as a DNB employee. In consultation with the employee's manager, the compliance officer may impose conditions in specific cases to prevent actual or perceived conflicts of interest.

2.6

The compliance officer may grant dispensation from the provisions of Article 2.1 and Article 2.2. Such dispensation may be communicated to the Executive Board by the head of the Compliance, Integrity and Administrative Sanctions (CIBS) Department if relevant.

3. Incompatible activities

Principles

3.1

Employees are not permitted to perform incompatible activities.

Notes: An impeccable reputation is essential to maintain trust in DNB. As a DNB employee, you must act in the interest of DNB – and hence the public good – and refrain from performing incompatible activities. These may be secondary (paid or unpaid) positions or activities that you perform (in your spare time or otherwise) in addition to your regular work for DNB, but also other activities that you perform in your spare time. Although you have the right to privacy and freedom of association, any activities that could cast DNB in a negative light may be incompatible with the principles of good public service (see also the explanatory note to Article 3.3.2).

Secondary activities are compatible if they arise from DNB's tasks or activities or if you perform them by virtue of your position and there is no potential actual or perceived conflict of interest. Examples of such activities are guest lectureships by virtue of your position at DNB and memberships of certain consultative committees on which you represent DNB. In such cases, permission from your manager is sufficient and the compliance officer's approval is not required. If in doubt, however, you should contact the compliance officer for advice. Any fees received for these activities must be handed over to DNB.

Furthermore, secondary activities are considered compatible if they have been approved by both the compliance officer and your manager. Performed in a private capacity (and therefore not by virtue of the employee's position), these activities must be carried out in your own free time, and there must be a clear distinction between time spent working for DNB and time spent on secondary activities. You must retain sufficient flexibility to carry out your duties for DNB and your performance must not be affected by your secondary activities.

Incompatible secondary activities include, for example, a board position in a pension fund, a position in which you represent the interests of supervised institutions, consultancy on models or ICT systems supervised by DNB and providing training for a supervised institution alongside your work at DNB. Teaching or writing an article in personal capacity, whether or not for a fee, is also not permitted unconditionally. In such cases, you must assess whether the activity could damage DNB's reputation or other interests, for example, or whether the activity has a bearing on your own work at DNB or DNB's primary tasks. If it does, this secondary activity is incompatible with your work at DNB and is therefore not permitted.

3.2

An incompatible activity is defined as an activity that, in view of DNB's objectives, interests, tasks and operations, causes or may cause:

- a. damage to DNB's reputation or interests;
- b. an actual or perceived conflict of interest;
- c. an excessive burden on the employee;
- d. any interference with the policies or operations of a supervised institution or an existing or prospective business associate.

Notes: The compatibility of an activity may be assessed on the basis of the following aspects:

- Was your position at DNB a factor in your decision on whether to take up a particular activity?
- Is there any overlap between the activities and your work for DNB, for example in terms of the field or nature of the activities?
- Will you have dealings with DNB when performing the activities, for example using DNB data or having contact with other DNB employees?
- Is the organisation for which you perform the activities less than reputable?
- Could your performance of the activities lead to negative publicity or reputational damage for DNB?
- Could the activities have a negative impact on your performance at DNB, for example because they take up too much time or energy?
- Can the hours spent on secondary activities be successfully combined with your work for DNB (subject to the manager's approval)?

Notification requirement for secondary and other activities

3.3.1

The employee must submit prior written notification of all paid and unpaid **secondary activities**, stating the relevant details, to their manager and the compliance officer, unless the activity is deemed evidently irrelevant. The secondary activities in question may only commence after approval by both the compliance officer and the employee's manager. No approval is required if the activity involves the sending of a delegation on behalf of DNB to national or international bodies in accordance with DNB's statutory duties and mandate.

Notes: An activity is evidently irrelevant if it has no actual or potential bearing whatsoever on DNB's objectives, interests, tasks or operations, as in the case of training/coaching a sports team or voluntary work at a nursing home.

When submitting notification of a secondary activity, you must supply at least the following information:

- a description of the secondary activity
- how many hours you intend to spend on the activity each week, and at what time
- whether you have already discussed this with your manager
- whether the secondary activity is paid or unpaid
- start date of the secondary activity (plus end date if known)
- any aspects having a bearing on DNB's performance of its tasks or on your performance of your particular tasks
- whether you will have dealings with other employees or (prospective) business associates of DNB
- an assessment of whether the activity could lead to reputational risk for DNB

3.3.2

If in doubt about the compatibility of **other activities**, the employee should seek prior written advice from the compliance officer. If the employee has performed any other activity that is incompatible with their work for DNB, they must report this in writing to their manager and the compliance officer.

Notes: to determine whether another activity is compatible, you should check whether any of the criteria listed in Article 3.2 apply. Possible compatible activities include, for example, taking a participating interest in a wind farm or a crowdfunding stake in a fashion brand startup. Membership of reputable associations and groups, e.g. a nature conservation association are also considered compatible.

Incompatible activities are private or other activities that negatively affect trust in DNB as a reputable and ethical organisation. Although you have a right to privacy and freedom of association, activities that cast DNB in a negative light may be incompatible with the principles of good public service. Examples include memberships of associations or participation in groups of ill repute that are regularly associated with crime and vandalism. Whether something is incompatible depends in part on the circumstances and the vulnerability of your position. For some positions, the risk of a negative perception is greater than for others. This depends, among other things, on the nature of your work, your position and your public prominence as a DNB employee. For example, if you were involved in an incident (e.g. a demonstration) that turned violent and was witnessed by the press, with the potential that you could be identified as a DNB employee, you must report it. The same applies to involvement in other criminal offences (e.g. fraud) that could negatively affect DNB's interests or operations.

Cooling-off period

3.4

Before taking up their duties at DNB, new employees must notify the manager and compliance officer in writing of all secondary or other activities that they have performed or are performing and that may be deemed incompatible.

Notes: if you worked at a supervised institution or one of DNB's business associates, for example, before working for DNB, further arrangements may need to be put in place (possibly on a temporary basis) with regard to the nature of your work for DNB. A person who previously held a position at a supervised institution and who will be supervising that same institution in their position at DNB must, if these two positions are incompatible, undergo a 'cooling off' period in another position first.

3.5

1. Where an employee intends to terminate their employment with DNB¹ and plans to undertake activities that may be considered incompatible, the employee shall notify their manager and the compliance officer thereof in writing as soon as possible. The notification to the compliance officer must be made in any event before the contract is signed.
2. The notification requirement referred to in the previous paragraph remains in force for three months following the end of employment at DNB for staff members and for six months for divisional directors.

Explanatory note: if the new position or activities touch on your position at DNB and/or DNB's remit and could therefore lead to an actual or perceived conflict of interest, a cooling off period may be necessary in respect of supervisory and confidential information. Examples are:

- a new position at a supervised institution or business associate of DNB;

¹ Or has been informed that their work for DNB is being terminated.

- a new position at a consultancy firm having contracts with supervised institutions or business associates of DNB involving duties that touch upon the work performed at DNB;
- having knowledge of DNB's monetary policy that is relevant to your new work setting.

When submitting notification of a new position or activity, you must supply at least the following information:

- a description of your current position, including the main tasks and responsibilities;
- the name of the new employer or contracting authority and a description of the new position, including the main tasks and responsibilities;
- whether and how the new position or activity touches on your current work for DNB, or on DNB's remit;
- whether you have already discussed the planned activity with your manager.

Decision

3.6

After consultation with the employee's manager, the compliance officer will decide whether an activity carried out during the period of employment is compatible, possibly under certain conditions.

3.7

If, prior to commencing their employment for DNB, an employee performed activities that are incompatible with their work for DNB, the compliance officer may impose conditions on the commencement and nature of the employee's work for DNB, in consultation with the employee's manager.

3.8

After consultation with the manager and taking into account the provisions of Article 3.9, the compliance officer will decide whether, and if so what, cooling-off conditions should be imposed on the work that the employee will perform in the period prior to the termination of their work for DNB, and how long the cooling-off period should be.

Notes: The cooling-off period ensures that any remaining knowledge of an institution, organisation or its competitors, and the associated supervisory activities, becomes obsolete.

3.9

a. A cooling-off period of at least three months² applies if an employee who has been directly involved in the supervision of an institution takes up employment with or begins working for:

- (i) that supervised institution or its affiliated companies;
- (ii) a direct competitor of the entity referred to in (i);
- (iii) a service provider of an entity referred to in (i);
- (iv) an entity engaged in lobbying and/or advocacy activities directed at DNB in relation to matters for which the employee was responsible during their employment.

b. In other cases where the new role or duties overlap with their role at DNB and may therefore give rise to an actual or perceived conflict of interest, a cooling-off period of two months will apply in principle.

c. In the case of divisional directors, where the new position or duties overlap with their role at DNB and could therefore give rise to an actual or perceived conflict of interest, a cooling-off period of six months applies in principle.

d. Depending on the circumstances, and subject to legal requirements and any applicable conditions, the compliance officer may decide to apply a shorter or longer cooling-off period.

² These periods derive from Section 12d of the Bank Act 1998.

Notes: The phrase 'has been directly involved in the supervision of an institution', as set out in paragraph a, should be interpreted broadly. This includes not only staff in divisions responsible for direct supervision, but also staff in horizontal or cross-functional roles such as Legal Affairs, Supervisory Policy, Market Access and various Centres of Expertise, where their work prior to moving to a new employer directly contributed to DNB's supervisory role or the associated decision-making process.

Furthermore, the term 'a service provider of a supervised institution or its affiliated companies' as set out in paragraph a(iii) is understood to mean:

- o an entity to which tasks or parts of critical or important functions have been outsourced, or*
- o an entity that provides legal, accounting or consultancy services.*

In certain cases, an appropriate financial compensation may be claimed in the event of a mandatory cooling-off period, see the Personnel Guide.

4. Benefits, invitations and meetings with financial sector representatives³

Principles benefits

4.1

In their capacity as DNB staff members, employees are prohibited from demanding or accepting benefits from a **supervised institution or any of DNB's current or prospective business associates** either for themselves or for a third party.

Notes: Benefits include gifts, allowances, vouchers, hospitality (such as lunch, dinner, travel expenses or hotel accommodation) or other favours. No employee may accept benefits offered by supervised institutions or DNB's current and prospective business associates. There is zero tolerance of such conduct. This is because DNB seeks to avoid any actual or perceived conflict of interest. The relationships between DNB employees on the one hand and supervised institutions and DNB's current and prospective business associates on the other hand are particularly vulnerable in this regard. Limited and customary hospitality, such as a cup of coffee or a modest lunch during a supervisory visit, is not regarded as a benefit.

4.2

In their capacity as DNB staff members, employees are prohibited from accepting, for themselves or for a third party, benefits offered by any **third party** other than a supervised institution or DNB's current or prospective business associates if the value of such benefits exceeds €50.

Notes: Benefits received from universities and non-profit organisations, for example, with a value of €50 or less are considered acceptable, since there is generally no presumption of conflicts of interest with such parties. Examples include a book or flowers presented after a guest lecture or presentation. You must, however, be alert to any repeated pattern of benefits offered by the same party.

³ Any form of preferential treatment and acceptance of reward or benefits in return is prohibited. This could involve bribery (or official bribery), which is a criminal offence. The converse, such as requesting a favour in exchange for any form of reward, is of course also prohibited. Bribery poses a threat to the independence and reputation of DNB and its employees. Any involvement in bribery must therefore be avoided. Any employee who encounters bribery (or attempted bribery) must report it to the compliance officer as soon as possible. The employee can also contact the compliance officer if they are in doubt as to whether bribery is involved.

4.3

Notwithstanding the provisions of Article 4.2, employees may accept benefits offered **by other central banks and national and international government organisations** provided they are appropriate and customary as befits the situation.

Notes: accepting benefits from these kinds of organisations carries less risk of an actual or perceived conflict of interest than accepting benefits from supervised institutions, DNB's current or prospective business associates or other third parties.

4.4

No employee may accept benefits within the meaning of this Regulation at their home address; employees must return such benefits and report them to their manager and the compliance officer.

4.5

a. The provisions concerning the acceptance of benefits by employees also apply conversely to the offering of benefits by DNB or its employees.

b. As an exception to paragraph (a), it is permitted to present, on behalf of DNB, a small gift or token of appreciation worth up to €50 to an employee working at or for a supervised institution or a business associate of DNB, provided that this person has made a contribution, such as a guest appearance or a lecture, at DNB's request.

Principles invitations

4.6.1

Employees may accept invitations from supervised institutions, DNB's current and prospective business associates and other third parties to conferences, receptions or events on condition that:

- the gathering is predominantly of a business nature;
- the employee's attendance is proportionate and in DNB's interest;
- participation cannot lead to an actual or perceived conflict of interest;
- participation does not conflict with the independent fulfilment of the employee's duties and responsibilities.

4.6.2

The basic principle is that DNB will bear the costs of the hospitality associated with these invitations, insofar as such hospitality contravenes the provisions of Articles 4.1 to 4.3.

4.6.3

As a basic principle, invitations that include a partner or other non-employee are not considered to be predominantly of a business nature and must not be accepted.

Notes: The guiding principle is that any semblance of inducement or acceptance of lavish entertainment must be avoided. Invitations to events must in no way impede or appear to impede the independent and objective performance of your duties. Your attendance at an event on the invitation of any of DNB's current or prospective business associates (such as an asset management or ICT service provider) or any supervised institution must contribute to your duties and activities for DNB. Appropriate limited and customary hospitality, such as a cup of coffee, sandwich or drink, can in principle be accepted.

4.7

Employees must refuse or return without delay, possibly through the compliance officer, any benefits and invitations that they are prohibited from accepting.

Meetings with representatives from the financial services sector

4.8

Employees of designated organisational units must document their meetings with representatives from the financial services sector that do not relate to regular (supervisory) activities or visits in DNB's central register of meetings. They must document at least the following information: The names of parties/representatives from the financial services sector and any other individuals present

2. The date and time of the meeting

3. The topics discussed (in outline)

Notes: the requirement to document meetings in the central meeting register only applies to meetings with representatives from the financial services sector that do not relate to regular (supervisory) activities or visits. Meetings related to regular supervisory activities or visits do not need to be included in the register. Meetings with public parties do not need to be included in the register either. The same applies to informal meetings, for example during a seminar, conference or course, where there is no discussion of substantive, non-public matters relating to the work at or of DNB. Please see the Instruction on documenting meetings with representatives from the financial services sector in the central meetings register for more information.

Quiet period for employees involved in monetary policy meetings

4.9

Employees involved in ECB monetary policy meetings or the associated preparations must refrain from giving any speeches or making any other comments that could influence the expectations of third parties during the 'quiet period'. This quiet period commences one week prior to the monetary policy meetings of Governing Council of the ECB.

Notification requirement

4.10

The employee must notify their manager of any benefit or invitation received or offered, including benefits which they are permitted to accept under these Regulations. This also applies to proposed meetings with financial sector representatives.

4.11

Employees must also notify the compliance officer in writing of all benefits and invitations received or offered that they are prohibited from accepting under this Regulation or whose acceptability is doubtful. The same applies in case of doubt about the acceptability of a proposed meeting with financial sector representatives or where there is doubt as to how the provision concerning the cooling-off period should be applied.

Decision

4.13

In case of doubt, the compliance officer will decide whether a benefit, invitation or meeting with financial sector representatives may be accepted and will notify the employee and the employee's manager of this decision in writing.

5. Final provisions

5.1

The compliance officer is authorised to deviate from the provisions of this Regulation for well-founded reasons.

5.2

In all cases not covered by this Regulation, the head of the Compliance, Integrity & Administrative Sanctions (CIBS) Department decides, where necessary after consulting with the Executive Board Member responsible for CIBS.

5.3

The compliance officer may monitor compliance with this Regulation. To this end, the compliance officer may request information from the employee, who is obliged to supply it.

5.4

In principle, any contravention of this Regulation will be regarded as a serious breach of the trust that DNB, as an employer, must be able to place in the employee. It may therefore lead to an appropriate sanction in accordance with DNB's relevant internal policies⁴.

Decision

5.5

Decisions under this Regulation will be taken as soon as possible but in any event no later than ten business days after the employee's notification requiring a decision if the compliance officer has all relevant information needed to take a decision.

5.6

All notifications to the compliance officer under this Regulation, except information queries or questions on the interpretation of the Regulation, as well as all relevant data provided, conditions set and decisions taken, will be recorded in the employee's compliance file.

5.7

The compliance officer is authorised to deviate from the provisions of this Regulation for well-founded reasons.

5.8

Objections to decisions under this Regulation may be lodged with the Executive Board. Notices of objection must be lodged no later than four weeks after the relevant decision was communicated to the employee.

Effective date

5.9

The Regulation on the independence of DNB employees 2026 enters into force on 1 July 2026 and replaces the DNB Employee Independence Regulation 2024.

⁴ DNB's sanctions procedure applicable to violations of the internal rules

6. Definitions

This Regulation defines the following terms.

a. Activity/secondary activity:

Paid or unpaid positions or activities that the employee performs (in their spare time or otherwise) in addition to their regular work for DNB, but also other activities that the employee performs in their spare time, during (unpaid) leave or during secondments.

b. Compliance officer:

The employee in the Compliance, Integrity & Administrative Sanctions (CIBS) Department charged with monitoring compliance with this Regulation.

c. Related third party:

- the employee's spouse or partner
- the employee's children or foster children
- the employee's relatives by blood or by marriage up to the second degree
- persons with whom the employee maintains close personal ties.

d. Affiliated companies

This refers to direct or indirect parent companies and subsidiaries of the institutions subject to supervision. The term also refers to other legal entities that fall into at least one of the following categories:

- i. entities included in the consolidated financial statements prepared by the supervised institution;
- ii. entities that fall within the same institutional protection scheme (IPS) as referred to in Article 113(7) of Regulation (EU) No 575/2013, in the same way as the supervised institution. For example, two independent (sister) banks within the same group that act as guarantors for one another, or
- iii. entities that are permanently affiliated with the same central body as referred to in Article 10 of Regulation (EU) No 575/2013, in the same way as the supervised institution. For example, local cooperative banks within a single cooperative group, where the various credit institutions may be treated as a single institution for prudential purposes.

e. Prospective employee

The person who is to work for DNB from the moment the relevant contract is signed and/or the onboarding process has begun.

f. Employee

The person working for DNB, including staff of external service providers/suppliers where the agreement provides for the application of these regulations, with the exception of members of the Executive Board and members of the Supervisory Board.

Notes: 'Employee' refers to anyone who performs work for DNB, where there is a relationship of authority between DNB and such person, irrespective of the type of relationship between the person and DNB. The definition of employee includes in any event staff members holding a permanent or temporary position, agency staff, temporary workers, interns and secondees. Consequently, independent external consultants and service providers, such as window cleaners, do not fall within the scope of this Regulation.

g. Supervised institution:

An institution, including its affiliated companies, that carries out financial activities in or from the Netherlands which are supervised by DNB (whether or not in conjunction with the ECB or other supervisory authorities). If an employee, by virtue of their work, is familiar with a licence or

registration application submitted to DNB by a particular institution, they must also regard that institution as a supervised institution.

Notes: Examples of supervised institutions include banks, insurers, pension funds, payment institutions, investment firms, trust offices, managers of (alternative) investment funds, crypto service providers (under MiCAR) and crowdfunding platforms.⁵

h. Lobbying and advocacy activities:

any professional activity aimed at directly or indirectly influencing DNB's decision-making processes, the implementation of those decisions, and all other activities falling within DNB's remit, or the public perception of DNB.

Notes: For the purposes of this document, 'directly and indirectly influencing' is understood to mean:

(a) 'direct influence': influence exerted through direct contact or direct communication with DNB, or through other resultant actions.

(b) 'indirect influence': influence exerted through intermediary channels such as the media, public opinion, conferences or social events, directed at DNB.

Secondments or unpaid leave activities in connection with positions at national ministries or other public authorities, or EU institutions, agencies or bodies, do not constitute lobbying or advocacy activities.

i. Conflict of interest:

A situation in which an employee has direct or indirect personal interests that could affect the impartial and objective performance of their duties or could create the semblance of doing so.

Notes: In this context, personal interests refers to the financial or non-financial interests of an official and their related third parties.

j. Transaction:

An agreement involving an exchange of goods, services or rights and to which DNB is a party.

k. Benefits:

Gifts, discounts, vouchers, hospitality and other benefits and favours.

Notes: Limited and customary hospitality, such as a cup of coffee or a modest lunch during a business or supervisory visit, is not regarded as a benefit.

l. Business associate:

A professional or commercial relationship between DNB and a natural person, legal entity or company, connected to DNB's professional activities, for example with suppliers, employment agencies and business service providers. This also includes interest groups related to DNB's tasks and reporting entities under statistics regulations.

⁵ See, for example, the DNB Public Register, the List of institutions under DNB oversight, and the AFM Licence Register