



Declaration of Interests

Efterm Oversight Committee members

2024

The European Money Markets Institute (EMMI), as a critical benchmark administrator, 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 personal or business¹ 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 or business 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 EMMI Mapping of Conflicts of Interest (D0330H-2018) provides the following definitions of personal or business interest:

- 1) Personal interest is a situation in which a person has a financial interest or a personal connection that could impair that person's ability to act impartially and in the best interest of EMMI. Financial interest is anything of monetary value that might have an impact on a person's own financial situation. Personal connection is a formal or informal family tie, close friendship or a relationship with a person with whom there has been a personal conflict in the past.
- 2) Business interest is a situation whereby a person has a business contact or an affiliation to an organisation or an entity that could impair that person's ability to act impartially and in the best interest of EMMI.

I, the undersigned, PATRICK SINEON Member of the Committee, confirm that:

- I am appointed on a personal basis, and I am not subject to instructions from ANUNDI the company/organisation with which I am affiliated.
- I will not be instructed by the company/organisation with which I am affiliated with respect to my function as a member of the Committee.
- I have business or personal relationship to a stakeholder that has an interest in EMMI activities:.....
- I have loans, capital shareholdings, warranties, or any other financial interest referenced to Eferm or to, generally speaking, euro interest rate benchmarks.
 - Yes
 - No
- I have no other relevant interest to declare other than the ones disclosed above.
- 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 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 and that I have no interests other than the ones disclosed above.. I undertake to immediately inform EMMI of any change in my interests and/or in my position, affiliation, etc.
- 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: PATRICK SINEON HEAD OF MONEY MARKET

Date: 15/02/2024

Signature: 

Enclosures: D0223A-2021_EMMI Conflicts of Interest Policy
D0224A-2021_EMMI Conflicts of Interest Procedure
D0374C-2014-EMMI Confidentiality Policy

