

Explanations of responsibilities:

R- Responsible person, A- Approver, C- Consultation, I- Information

Phase	The person affected by the Conflict of interest			
	Employees	Direct subordinates of a Member of the Board of Directors	Board of Directors	Supervisory Board
Notification of conflict of interest	Notifying person and direct supervisor - R Compliance manager - I	Notifying person and Board of Director - R Compliance manager - I	Notifying person Member of Board of Directors - R Compliance Manager - I	Notifying person Member of Supervisory Board – R Supervisory Board - I Compliance manager - I General Meeting - I
Assessment of conflicts of interest Within 3 working days	Direct supervisor - R Compliance Manager and Legal Counsel - I Notifying person - I	Board of Directors - R Compliance Manager and Legal Counsel - I Notifying person - I	Compliance Manager and Legal Counsel - R Board of Directors - I	Compliance Manager and Legal Counsel - R Supervisory Board - I General Meeting - I
Resolving conflicts of interest Within 7 working days	Direct supervisor - R Compliance Manager and Legal Counsel - A Notifying person - I Persons designated for the implementation of the solution - I	Board of Directors - R Compliance Manager and Legal Counsel - A Notifying person - I Persons designated for the implementation of the solution - I	Compliance Manager and Legal Counsel - R Supervisory Board - A Board of Directors - I Persons designated for the implementation of the solution - I	Compliance Manager and Legal Counsel - R Supervisory Board - I General Meeting - A Persons designated for the implementation of the solution - I
Implementation of corrective measures	Direct supervisor - A Persons designated for the implementation of the solution - R Compliance manager - I Notifying person - I	Board of Directors - A Persons designated for the implementation of the solution - R Compliance Manager - I Notifying Person - I	Supervisory Board - A Persons designated for the implementation of the solution - R Compliance Manager - I Notifying person - I	General Meeting – A Persons designated for the implementation of the solution - R Compliance Manager - I Notifying person - I
Monitoring	Compliance manager			
Supervision (in the form of checking report from the Compliance Manager)	Board of Directors		Supervisory Board	General Meeting