

Information on the Related Party Transactions Policy

This document sets out the policy of Credit Europe Bank N.V. (hereinafter "Credit Europe") for handling of potential conflicts of interest in relation to Related Party Transactions. Related Party Transactions can present potential or actual conflicts of interest and may raise questions about whether such transactions are consistent with the company's and its customers' best interests. Therefore, this policy has been adopted in order to set forth:

- (i) the arrangements for the proper management of potential conflicts of interests regarding Related Party Transactions, and
- (ii) the procedural rules and deadlines to be respected in providing information on Related Party Transactions to Credit Europe's Managing Board and the appropriate standing subcommittee of the Supervisory Board (Audit & Risk Committee).

This document must be read in conjunction with Credit Europe's Conflicts of Interests Handling Policy.

Principles

- If and when a transaction between Credit Europe and a Related Party is to be concluded a potential conflict of interest exists.
- Any Related Party Transaction must be concluded at arm's length basis, i.e. as if the parties involved were not related.
- Any transactions which are to be concluded between Credit Europe entities are considered intercompany transactions and must be concluded at arm's length basis as well.

Related Party

A Related Party is:

- a FIBA Group entity, not being Credit Europe's parent company or one of its direct or indirect subsidiaries,
- an entity in which a Credit Europe Board Member,
 - (i) holds directly or indirectly, a material interest (financial or another interest of 10% or more), and/or
 - (ii) holds directly or indirectly, a management or supervisory position,
- an ultimate beneficial owner or director of a Related Party-entity with whom a Credit Europe Board Member has a relation under family law (by blood or marriage up to and including the second degree),
- a person with whom a Credit Europe Board Member has a relation under family law (by blood or marriage up to and including the second degree).

A list of Related Parties is prepared and maintained by Credit Europe. As soon as a Board Member appointed as a member of Credit Europe's credit committees becomes aware of the emergence of a new Related Party, the Board Member shall give notice thereof to the appropriate function within Credit Europe which updates the list on the basis of the information received.

Procedures for Related Party Transactions

A. Related Party Transactions requiring pre-approval

Credit related services (i.e. services offered under a credit limit):

- Any new or change to credit limits for services requiring a credit limit, including the conditions set for such limits, proposed by Credit Europe or its subsidiaries to be applied to a Related Party-entity.
- Personal loans made/maintained by CEB Group to a Related Party-individual.

B. Related Party Transactions not requiring pre-approval

Non-credit related services (i.e. services not offered under a credit limit) provided by Credit Europe or its subsidiaries to a Related Party:

- Banking services, such as current accounts, savings accounts, time deposits, fiduciary placements.
- Insurance contracts.
- Services in financial instruments not requiring a credit limit (e.g. purchase or sale of bonds).

The arrangements for the management of Related Party Transactions that fall within category A are detailed in the text below.

Any Related Party Transactions that fall within category B are deemed not to create or involve a material interest on the part of the Related Party and will neither require any approval nor management of the potential conflict.

FIBA Group

The global credit limit to be applied to FIBA Group, including any revision as well as the conditions set for such limit, must be pre-approved by all independent Supervisory Board members of Credit Europe. In addition, all credit proposals for establishment, renewal or increase of a credit limit as well as credit proposals for decrease or cancellation of existing limits, including (any changes to) the conditions set for such limit, for the benefit of a FIBA Group entity, must be approved by all independent Supervisory Board members of Credit Europe.

Other Related Party-entities

All credit proposals for establishment, renewal or increase of a credit limit as well as credit proposals for decrease or cancellation of existing limits, including (any changes to) the conditions set for such limit, for the benefit of a Related Party-entity, not being a FIBA Group entity, must be approved by the appropriate approval body according to the respective Credit Committee Charter.

In case a participating member is conflicted, he or she will abstain from discussing and voting or deciding on any issue in relation to the credit limit at hand. To this extent, the appropriate approval body will ask the conflicted member to leave the meeting during discussion and voting on such issue, as his or her presence may influence decisions to be made.

Corporate limits

In case three or more members participating in the International Corporate Credit Committee (for corporate limits) are conflicted, the approval must be obtained from all independent Supervisory Board Members of Credit Europe.

Financial Institution (FI) limits

In case:

- (a) the credit proposals for establishing, renewing or increasing of FI credit lines exceed the authority levels of the FI (Amsterdam) Credit Committee, or
- (b) two or more members participating in the FI (Amsterdam) Credit Committee are conflicted,

the approval must be obtained from the International Credit Committee (ICC) for FI limits. In case two or more members participating in the International Credit Committee (ICC) for FI limits are conflicted, the approval must be obtained from all independent Supervisory Board members of Credit Europe.

Related Party-individual: personal loans

The rules as set out in Credit Europe's Internal Financial Services Regulation are applied to personal loans that are to be granted to Related Party-individuals.

Related Party Transactions Reporting

Internal

The Managing Board of Credit Europe is responsible for an adequate reporting on Related Party Transactions to the Supervisory Board of Credit Europe.

The Audit & Risk Committee monitors the developments in Related Party Transactions, including any irregularities found in the management of conflicts related to such transactions. For this purpose, a quarterly report on Related Party Transactions is prepared under responsibility of the Managing Board of Credit Europe and discussed in the periodical Audit & Risk Committee meetings.

External

In line with the best practices of the Dutch Corporate Governance Code, a list of performed transactions with Related Parties must be disclosed externally. For this, Credit Europe adheres to best market practice in terms of disclosure in its annual report.

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