

# Conflict Policy

## INTRODUCTION

All conflicts of interest that may arise in connection with Bondora's credit platform shall be identified and resolved by Bondora. We shall take all necessary measures to prevent the further evolution of the conflict and the potentially resulting damage to the interests of our customers. This document describes our conflict of interest policy (the "Conflict Policy") that applies to the operation of our Portal.

We are fully committed to complying with our regulatory and legal obligations and ethical standards. All of our employees are contractually committed to complying with our Conflict Policy. Violation of the Conflict Policy may result in a penalty, including termination of the employment contract.

## SIGNS OF POTENTIAL OR REALIZED CONFLICTS OF INTEREST

A conflict of interest may arise when a member of the management board of Bondora, its employee, an employee of its affiliate, or other related party provides services to Bondora's customers or independently engages in other activities that may harm the interests of Bondora's customers, such as in a situation where one of the above persons:

- could benefit financially or avoid financial loss at the expense of a Bondora's customer;
- has an economic interest in the result of the service provided, which interest is different from that of a Bondora's customer;
- receives any benefit for favoring a Bondora's customer over another Bondora's customer;
- receives any benefit (money/goods/services) from any person other than the usual commission for the service provided to Bondora's customer.

## POTENTIAL OR REALIZED CONFLICTS OF INTEREST WE HAVE IDENTIFIED

Customers are charged a management fee for using our platform in accordance with their Credit Agreements and other agreements.

In addition, we may pay third parties to direct customers to us, and such transactions are properly disclosed.

## **EMPLOYEES**

A conflict of interest may arise if an employee of Bondora (or a member of the employee's family) is in any way related to another party to a transaction, especially if that party is Bondora's customer. Related parties include members of the management board of Bondora's customers, persons with significant holdings and consultants. Bondora's employees are required to disclose any relationship that may influence their decisions or involve an economic interest.

## **RESOLUTION AND DISCLOSURE OF CONFLICTS OF INTEREST**

Bondora will take all possible and reasonable steps to resolve potential conflicts of interest. If there is a significant risk of loss to Bondora's customer, we will disclose it.

We will implement all necessary procedures, including staff training, to ensure that situations that may give rise to conflicts of interest are identified and properly addressed.

All potential conflict situations are closely monitored.

## **ADDITIONAL INFORMATION**

This document will be regularly reviewed and updated as necessary. If you have any questions about this Policy, please contact us using the contact information provided on Bondora's Website. The terms have the same meaning as in the Bondora User Agreement unless otherwise defined herein.