

Conflict policy

1. INTRODUCTION

- 1.1. Any conflicts of interest, which may arise in relation to Bondora, shall be identified and managed by the company. We will maintain and manage all arrangements necessary to prevent a conflict from escalating to causing material damage to the interests of our clients. The given document states our conflicts of interest policy (here and further "Conflicts Policy") inasmuch as it applies to the operation of our activities.
- 1.2. We are fully committed to complying with our regulatory and legal obligations and maintaining the ethical standards. We require that all of our employees are contractually bound to comply with our Conflicts Policy and any breach of such may lead to disciplinary proceedings, not excluding discharge of services.

2. POTENTIAL OR ACTUAL CONFLICTS INDICATION

- 2.1. A conflict of interest may take place if any of Bondora directors, employees, outsource partners or otherwise "relevant persons" linked to the company by control is providing a service to Bondora clients or engaging in activities on their own account, which may cause a material risk or damage to Bondora clients' interests, for example where any of the mentioned above persons:
 - could either make a financial gain or avoid a financial loss, on the account of a Bondora client;
 - has an interest in the outcome of a rendered service, which is different from the interest of a Bondora client;
 - is incentivized to offer privilege to one of Bondora clients on the account of another Bondora client;
 - receives an incentive in any form (financial / goods / services) other than the standard commission fee, from a person other than the Bondora client for a service rendered to a Bondora client.

3. POTENTIAL OR ACTUAL CONFLICTS OF INTEREST WE HAVE IDENTIFIED

- 3.1. Borrowers are subject to a borrowing fee for receiving access to our platform, as stated in their Loan Agreement and any other contracts. This fee includes the amount, which we estimate to reflect the possibility of their default, viewed against their Credit Rating and in relation to their Loan Agreement.
- 3.2. We may as well make payments to the third parties for referring clients to us; however an appropriate disclosure shall be made for such instances.

4. EMPLOYEES

A conflict of interest may occur if a Bondora employee (or the employee's family) is somehow associated to the other party of any given transaction, especially if such party is a Bondora client. This association may include being a director, significant shareholder or a consultant to any Bondora client. Bondora employees are required to disclose any connection, which could compromise their judgment, or involve any material interests.

5. MANAGING CONFLICTS OF INTEREST AND DISCLOSURE

- 5.1. Bondora will make all possible and reasonable efforts to mediate any conflict of interest.
- 5.2. Should there be a considerable risk of damage to any Bondora client, we will issue an appropriate disclosure.
- 5.3. We will carry out all necessary procedures, including employee training, to ensure that circumstances at which conflict of interest may arise are identified and properly managed.
- 5.4. All conflicts, which may arise, shall be closely monitored.

6. FURTHER INFORMATION

- 6.1. The given document shall be reviewed and updated as necessary. In case of any questions in regards to this policy, please send an email to asiakaspalvelu@bondora.fi.
- 6.2. Capitalized terms bear the meaning outlined in Bondora Terms and Conditions, unless defined otherwise.

