

ANNEX to Rules of Procedure for the General Board of AMLA***Practical arrangements for the prevention and management of conflicts of interest*****Conflict of Interest Policy for Non-Staff**

The General Board of AMLA

Having regard to article 59 (3) of the Regulation

Whereas:

- (1) Independence and high standards of professional conduct by all those involved in the activities of AMLA are crucial for AMLA's excellence and reputation;
- (2) Transparency and openness are essential to ensure public confidence;
- (3) The responsibility for declaring any interest that might be considered prejudicial to their independence can only be placed on the concerned persons themselves;
- (4) High quality of expertise is by nature based on prior experience and knowledge acquired in the relevant domain;
- (5) Some of those interests may however conflict with AMLA's objectives and responsibilities;
- (6) Some interests that are considered to cause a conflict of interest in particular in the context of AMLA's direct supervision should be defined and accordingly prohibited;
- (7) Other interests that might cause a conflict of interest should be defined in order to provide guidance to the concerned persons when filling the declarations under this Policy;
- (8) Any conflict of interest should be promptly identified, handled and mitigated without delay. To this end, a system of declaration of interests and their subsequent screening and evaluation is required;
- (9) To ensure consistent reporting and evaluation, a set of comprehensive declaration forms should be used;
- (10) A transparent procedure should be followed by establishing inter alia the following aspects:
 - (a) Guidelines to the Chair, Executive Board and AMLA's Ethics Officer performing the screening and evaluation of declarations of interest;
 - (b) Transparent consequences linked to the interests declared.

Has adopted - as part of the Rules of Procedure for the General Board of AMLA - the following Policy:

TITLE I – GENERAL PRINCIPLES AND INTERESTS TO BE DECLARED**SECTION I – GENERAL PRINCIPLES****Article 1 – Scope and definitions**

- (1) The present Policy is applicable to:
 - (a) The voting members of the General Board and their officially nominated alternates;
 - (b) The non-voting members of the General Board and their officially nominated alternates and any representatives of national competent authorities referred to in Article 57(2) and (3) of the Regulation;
 - (c) The observers participating in the General Board and their officially nominated alternates;
and
 - (d) The accompanying persons as defined under Article 6(12) of the Rules of Procedure of the General Board.
- (2) This Policy shall not apply to accompanying persons who are not regular participants, attending less than twice a year the meetings of the General Board. Those participants are required to sign a Declaration of Ethical Conduct (DEC) (Annex III) covering the general principle of avoidance of conflicts of interest, the prohibition from using confidential information, and the rules on professional secrecy, prior to their first participation in any of the General Board meeting.
- (3) The Chair, as well as the other Members of the Executive Board, is subject to specific rules for the prevention and management of conflicts of interest, in accordance with Article 64(4)(e) of the Regulation [*STILL TO BE PREPARED/APPROVED*]. However, Title III of this Policy is applicable to all of them.
- (4) AMLA Staff members attending meetings of the General Board, including the Executive Director, are covered by the Conflict of Interest Policy for Staff [*STILL TO BE PREPARED/APPROVED*] and therefore the present Policy is not applicable to them. However, Title III of this Policy is applicable to the Executive Director.
- (5) This Policy shall be without prejudice to the application of stricter national rules, including rules on private financial transactions, or contractual arrangements applicable to those coming within the scope of this Policy in their capacity as representatives of the national competent authorities of each participating Member State. If and when, a member, observer, or accompanying person is prevented by reason of the applicable national legislation from complying with a provision of this Policy, this person shall inform the Chair and AMLA's Ethics Officer in accordance with Article 4 of this Policy.
- (6) For the purposes of this Policy:
 - (a) **interest** means the relation of being objectively concerned in something, e.g. by having a right or title thereto, a claim thereupon, or a share therein, falling within fields of competence of AMLA that creates or has the potential to create a conflict of interest;
 - (b) **interests of close family members** means interests (as defined above) held by spouses, partners or persons dependent on persons subject to this Policy (spouse/partner/dependent family member);
 - (c) **conflict of interest (Col)** means a conflict between the public duty of AMLA and any interests of an individual, interests of his/her close family members or of his/her employer, which could improperly influence the performance of his/her official duties and responsibilities, including the duty to act in the sole interest of the Union as a whole, or could compromise his/her impartiality, objectivity or independence.
 - (d) **forum** means any type of participation in AMLA's General Board activities (meetings, written procedures, ...).
 - (e) **obliged entity** means any selected obliged entity or non-selected obliged entity as defined in Article 2(1) of the Regulation.
 - (f) **AMLA's Ethics Officer** is a member of staff in charge of providing guidance to staff and non-staff on Col and ethics rules; in addition, he/she assesses, and keeps a record of, the declarations submitted for the activities covered by these rules, and reports regularly to the Executive Board.

- (7) For the purposes of this Policy, the following interests shall always be considered as creating a Col and are thus strictly prohibited:
- (a) The holding of any financial instrument relating to obliged entities that are subject to AMLA's direct supervision (selected obliged entities);
 - (b) Membership of a managing body or equivalent structure or any participation in an internal decision-making body (e.g. board membership, directorship) of an obliged entity directly supervised by AMLA (selected obliged entity), or a trade association of such persons.
- (8) For the purposes of this Policy, the following interests shall be considered as a source of Col, actual, potential, or perceived (non-exhaustive list):
- (a) Economic interest meaning any economic stake or share in non-selected obliged entities as defined in Article 2(1) of the Regulation), including holdings in the form of stocks, equities or bonds thereof, or of one of its subsidiaries or of a company in which it has a holding. This does not include personal insurance policies, collective investment funds or deposits contracted as a regular customer;
 - (b) Member of a managing body or equivalent structure, meaning any participation in an internal decision-making body (e.g. board membership, directorship) of a non-selected obliged entity as defined in Article 2(1) of the Regulation), or a trade association of such persons;
 - (c) Employment or consultancy, meaning any form of regular, occasional or ad hoc occupation or business, part-time or full-time, paid or unpaid, including self-employment, in or to any selected or non-selected obliged entity as defined in Article 2(1) of the Regulation), or a trade association of such persons. This includes also services provided on an honorary basis (i.e. for free or without the payment of fees or emoluments) and any advice related to products, their development and/or assessment methods thereof.
- (9) For the purposes of this Policy, any decision or measure addressed to an individual national competent authority, such as the ones adopted in line with Articles 32 (action in exceptional circumstances), 33 (settlement of disagreements between financial supervisors), 34 (actions in cases of systemic failures of supervision), 37 (warnings of breaches of Union law by non-financial supervisors and public authorities overseeing self-regulatory bodies), 38 (settlement of disagreements between non-financial supervisors), and 46 (mediation between FIUs) of the Regulation creates a Col for the representatives of the competent authority in the context of the adoption of such decisions, which needs to be addressed according to Title III. The adoption of a peer review report specific to an individual competent authority creates a Col for the representative of the concerned competent authority, which needs to be addressed according to Title III. There would however be no Col in the context of the adoption of a general peer review report and of recommendations addressed to a large number of NCAs.

Article 2 – General principles of declarations and assessment of interests

- (1) AMLA applies the principle that persons subject to this Policy are informed of their obligations vis-à-vis the declarations to be submitted in accordance with this Policy and the risks attached to non-compliance with such obligations. AMLA will ensure individual awareness through adequate information on the subject of Col.
- (2) A person subject to this Policy shall declare all personal interests and to the best of their knowledge an interest of close family members that creates a Col as defined in Article 1(6)(c) to AMLA which will assess the related risk.
- (3) The following general principles shall be applicable to all persons subject to this Policy:

- (a) The responsibility for a complete and truthful declaration shall lie exclusively with the person completing the declaration.
- (b) The identification and handling of CoI as defined in Article 1(6)(c) shall be based on the evaluation of the following declarations submitted by the concerned persons as specified in this Policy:
 - ✓ The general declaration on confidentiality and commitment whereby the person declares having read the present document, and confirms his/her awareness of his/her obligations (Declaration of Intention; Annex I);
 - ✓ The Declaration of Interests or DoI (Annex II);
- (4) Only interests from the two years preceding the submission of the declaration shall be declared.

Article 3 - Opinion of AMLA's Ethics Officer

- (1) Members of the General Board, observers, and other participants in meetings of the General Board, shall seek the opinion of AMLA's Ethics Officer in the event of doubt relating to the practical application of the rules laid down in this Policy.
- (2) Members of the General Board, observers, and, where applicable, other participants in meetings of the General Board, shall be informed of the principles and rationale of the opinions and recommendations issued by AMLA's Ethics Officer without identifying any individual Member of the Board, observer, or other participant.

Article 4 – Information on conflicting national or institutional legal provisions

- (1) Members of the General Board, observers and other participants in meetings of the General Board shall inform the Chair and AMLA's Ethics Officer of any impediment to compliance with this Policy to the fullest extent, including any impediment arising from conflicting national or institutional legal provisions.
- (2) If applicable, AMLA's Ethics Officer shall issue an opinion as regards any impediment to compliance with this Policy as referred to in paragraph 1 of this article, to be addressed to the Members of the Board for their consideration in accordance with Article 3(2) of this Policy.

SECTION II – DECLARATIONS

Article 5 – Declaration of Intention

- (1) Upon their appointment the persons identified in Article 1(1) shall make a declaration in writing concerning commitment and confidentiality in accordance with the template provided in Annex I to the present Policy.
- (2) The declarations of the persons identified in Article 1(1)(a) shall be made public via AMLA's website.
- (3) Persons subject to this Policy shall continue to be bound by the terms of their declaration after the end of their involvement in AMLA's activities.
- (4) Declarations shall be submitted to AMLA's Ethics Officer.

Article 6 – Declaration of Interests (DoI)

- (1) The persons identified in Article 1(1) shall declare on the basis of the DoI (Annex II) any interest that creates a Col as defined in Article 1(6)(c) with respect to all activities in which such persons are involved or have been involved during the two years preceding the submission of the DoI and which fall under AMLA's scope of action (as defined in Articles 1 and 2 of the Regulation).
- (2) The persons identified in Article 1(1) shall indicate whether the interests declared are current (when interests exist at the time of submission of the DoI) or whether they refer to a past period (when they stopped existing during the two years preceding the submission of the DoI).
- (3) Details on the name of the body or organisation of relevance for each declared interest shall be given. This is to be interpreted as meaning the full name, location of the seat (town and country) and nature (private or public).
- (4) Details on the subject matter of each declared interest shall be given, indicating the domain in which the activity is, or was, carried out and clarifying the interest and role of the concerned body or organisation in the matter and the role of the concerned person.
- (5) DoI shall be submitted to AMLA's Ethics Officer.
- (6) DoI shall be made public via AMLA's website.
- (7) AMLA's Ethics Officer may invite the persons identified in Article 1(1) for an annual declaration to provide it within a specified time frame.

Article 7 – Ad-hoc declaration of interest

- (1) Where a situation of a Col, not covered by a DoI already submitted, arises, other than in the context of a meeting or written procedure, the persons identified in Article 1(1) shall inform AMLA's Ethics Officer immediately.
- (2) In relation to meetings of the General Board, AMLA shall provide means for systematically receiving declarations of the existence of any conflict of interest to any item on the agenda in accordance with Title III.
- (3) Any ad-hoc declaration shall be recorded by AMLA's Ethics Officer, together with the specific mitigating measures imposed. In addition, the DoI already submitted might be updated and submitted to AMLA's Ethics Officer.

Article 8 – Declaration of prospective employment

- (1) The persons identified in Article 1(1)(a) (except the alternates) are requested to inform AMLA on their employment for two years following departure from AMLA's General Board.
- (2) Declarations shall be submitted in written form to the Chair.

TITLE II – GENERAL PROCEDURE FOR IDENTIFYING AND HANDLING POTENTIAL CONFLICT OF INTEREST**SECTION I – SCREENING PROCESS**

Article 9 – Screening of the Declarations of Interest

- (1) Upon receipt, AMLA's Ethics Officer shall screen the declaration in order to assess a Col arising in any of the categories described in Article 1(6), (7) and (8). The screening shall be performed according to the criteria specified under Article 10.
- (2) AMLA's Ethics Officer shall inform the Chair on the outcome of the screening, including a proposal for a preventive measure in case of an identified Col.

Article 10 – Criteria for the screening of declarations

- (1) AMLA's Ethics Officer or in case of Article 8 the Chair in consultation with AMLA's Ethics Officer, shall screen the declarations according to the following criteria:
 - (a) Interests can only be assessed by considering whether the specific interests declared by a person are compatible with AMLA's activities and interests;
 - (b) In the case of an ad-hoc declaration, the assessment should take into account the context in which the declaration is made, including the items on the agenda of a meeting in which the person participates, and the role and function that he or she is required to take on or perform in that context.

SECTION II – DECISION ON THE ASSESSMENT OF THE DECLARATION**Article 11 – Process for addressing declared Col of persons identified under Article 1(1)**

- (1) Upon being informed of a Col for a person identified under Article 1(1) by AMLA's Ethics Officer, the Chair shall take her/his decision within the shortest possible time.
- (2) The decision on the outcome of the screening rests with the Chair, who shall take a decision containing appropriate measures/action to remove or adequately mitigate an identified actual, potential or perceived Col.
- (3) Upon being informed of a prospective employment by a person identified in Article 1(1)(a) (except the alternates), under Article 8 the Chair shall, with the shortest possible time, take a position whether or not the prospective employment is seen as a Col from AMLA's perspective. The relevant national competent authority, current employer of the declaring person, shall, where possible, inform the Chair of their national mitigating measures, and/or be informed about the position of the Chair prior to taking its decision on the clearance of the prospective employment.
- (4) The Chair may on her/his own decision submit the complete file for decision to the Executive Board if he/she deems this appropriate.
- (5) Any preventive measure taken to address potential Col shall be recorded by AMLA's Ethics Officer.

Article 12 – Process regarding omissions of declarations

- (1) In case AMLA is aware, or is made aware, of some information that is not consistent with, or that is missing from, the declaration of a person subject to this Policy and that a preliminary assessment suggests that it concerns a declarable interest, AMLA's Ethics Officer shall seek additional

information from the concerned person with regard to the omission. At the same time, the concerned person shall be requested to update the missing details of the DoI.

- (2) Upon completion of the update, the DoI shall be processed and screened in accordance with the present Policy.
- (3) The Chair may take any appropriate preventive action regarding the individual's participation in AMLA's activities until completion of the missing details of the DoI.

Article 13 – Process regarding breaches of AMLA's rules on Declarations of Interest

- (1) In case the assessment of the DoI results in the identification of a breach of AMLA's rules on Col, AMLA's Ethics Officer shall inform the Chair.
- (2) The Chair shall perform a review of the draft decisions adopted by the forum in which that person participated. The Chair shall clarify whether, and if appropriate the extent to which, that individual influenced the outputs adopted by AMLA. The Chair shall take all the appropriate measures to address these findings.

Article 14 – Review of the decisions of the Chair and/or the Executive Board

- (1) In the case of a specific complaint filed by the concerned individual on a decision on Col taken by the Chair, the Chair shall submit the complete file to the Executive Board for its review and decision.
- (2) In the case of a specific complaint filed by the concerned individual on a decision on Col taken by the Executive Board pursuant to Article 11(4), the Executive Board shall submit the complete file to the General Board for review and decision.

TITLE III – SPECIFIC PROCEDURE FOR IDENTIFYING AND HANDLING POTENTIAL CONFLICTS OF INTERESTS AT THE GENERAL BOARD

Article 15 – Process regarding identification, notification and recording

- (1) Before any meeting or after the launch of a written procedure, members, their alternates, non-voting members as well as observers participating in the General Board, shall declare the existence of any interest which might be considered prejudicial to their independence in relation to any item of the agenda.
- (2) The Chair of the meeting will ask participants to confirm the absence or existence of conflict of interest at the start of the meeting, when the agendas are proposed for adoption. The declarations of absence or existence of any interest will be recorded in the minutes, together with any mitigating measures taken, and will be shared for recording purposes with AMLA's Ethics Officer.

Article 16 – Process for handling potential conflicts of interests

- (1) Where there is a potential conflict of interest in relation to any item of the agenda, the individual concerned shall abstain from participating in the discussion of and the voting upon that item. In

that case, the conflicted individual shall not be present during the discussion of and voting upon that item, or for comments and voting in the case of written procedures.

- (2) In the case of a competent authority being the addressee of an AMLA measure being tabled as an agenda item or subject to written procedures:
 - (a) the Head and, if relevant, the alternate of that competent authority, or of the representatives of any other competent authority from the same Member State shall not participate in the related discussion and voting on that agenda item nor in the voting if it takes place through a written procedure;
 - (b) AMLA shall ensure the proper application of the right to be heard, which is to be exercised before the discussion and voting on the matter by the General Board, taking full account of the urgency, complexity and potential consequences of the matter. Specifically, a representative of the concerned competent authority may present its position orally prior to, and separately from, the discussion and the voting on the matter; members can ask questions, in particular to the representative of the concerned competent authority, before the discussion and the voting, the latter taking place either at the meeting itself as a conclusion to the discussion, or through a written procedure.

TITLE IV – COMMON PROVISIONS

Article 17 – Publication and protection of personal data

- (1) AMLA shall process all DoI pursuant to Regulation (EU) No 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.
- (2) The purpose of the data processing is to safeguard the independence of AMLA and its constituent bodies.
- (3) The recipients of the DoI are the persons and bodies identified in the present Policy. Furthermore, DoI may be transferred to bodies in charge of monitoring or inspection tasks in conformity with Union Law, including the European Court of Auditors, the Internal Audit Service, OLAF, the European Ombudsman and the European Data Protection Supervisor.
- (4) The conservation period of DoI shall be two years after the discharge for the budgetary year to which the DoI relates.
- (5) Data subjects with active AMLA involvements have a right to access their DoI and to update or correct it at any time.
- (6) Data subjects also are entitled to have recourse at any time to AMLA's Data Protection Officer (dpo@amla.europa.eu) and/or to the European Data Protection Supervisor (<http://www.edps.europa.eu>).

Article 18 – Entry into force

- (1) This Policy shall take effect on the day following the adoption of the Rules of Procedure for the General Board of AMLA.

Overview of declarations

(Practical arrangements for the prevention and management of conflicts of interest - Conflict of Interest Policy - for Non-Staff)

	To completed by:	To be published on the AMLA website:
Declarations of intention	<ol style="list-style-type: none"> 1. GB voting members and their alternates 2. GB non-voting members and their alternates 3. GB observers and their alternates 4. Representatives of national competent authorities referred to in Article 57(2) of the Regulation 5. Accompanying persons as defined under article 6(12) of the GB Rules of Procedure 	<ol style="list-style-type: none"> 1. GB voting members and their alternates
Declarations of Interests (Dol)	<ol style="list-style-type: none"> 1. GB voting members and their alternates 2. GB non-voting members and their alternates 3. GB Observers and their alternates 4. Representatives of national competent authorities referred to in Article 57(2) of the Regulation 5. Accompanying persons as defined under Article 6(12) of the GB Rules of Procedure, unless they are subject to Article 1 (2) of the Conflict of Interest Policy (see DEC below) 	<ol style="list-style-type: none"> 1. GB voting members and their alternates 2. GB non-voting members and their alternates 3. GB observers and their alternates 4. Representatives of national competent authorities referred to in Article 57(2) of the Regulation
Declaration of prospective employment	<ol style="list-style-type: none"> 1. GB voting members 	None
Declaration of Ethical Conduct (DEC)	<ol style="list-style-type: none"> 1. Accompanying persons who are not regular participants in the meetings of the GB pursuant to Article 1(2) of the Conflict of Interest Policy 	None

**Annex I to Practical arrangements for the prevention and management of conflicts of interest
- Conflict of Interest Policy for Non-Staff**

Declaration of Intention

First Name	
Surname	
Authority	
MS Current AML involvement	

I declare that I have read the *Practical arrangements for the prevention and management of conflicts of interest (Conflict of Interest Policy) for Non-Staff* (Annexed to the Rules of Procedure of the General Board of AMLA of XX XX 2025) and that I am aware of, and undertake to comply with, my obligations.

I declare that I have read the General Board Decision on Rules of Procedure on Professional Secrecy for Non-Staff [*STILL TO BE PREPARED/ADOPTED*] in accordance with article 88 of the Regulation (EU) 2024/1620 of the European Parliament and of the Council of 31 May 2024 establishing the Authority for Anti-Money Laundering and Countering the Financing of Terrorism, and that I am aware of, and undertake to comply with, my obligations.

I hereby agree and acknowledge as follows:

1. "AML Information" means all oral or written information, facts, data and any other matters, of which persons referred to in Article XX of the General Board Decision on Rules of Procedure on Professional Secrecy for Non-Staff [*STILL TO BE PREPARED/ADOPTED*] acquire knowledge, directly or indirectly, as a result of their AML activities whether or not contained in a document of any kind (electronic or on paper or any other medium) that is proprietary to or possessed by AMLA and has not been made public by AMLA.
2. "Unauthorised Disclosure of AML Information" means the act of intentionally or unintentionally disclosing AML Information to unauthorised recipients.
3. I will treat all AML Information – except for information classified as "PUBLIC" or information which has already been made public – as subject to the General Board Decision on Rules of Procedure on Professional Secrecy for Non-Staff [*STILL TO BE PREPARED/ADOPTED*], and I undertake not to make any Unauthorised Disclosure of AML Information.

I have read and understood this undertaking and agree to its terms.

Date:	Signature:
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Please send a signed copy of this form to AMLA's Ethics Officer at ethics@amla.europa.eu.

**Annex II to Practical arrangements for the prevention and management of conflicts of interest
- Conflict of Interest Policy for Non-Staff**

Declaration of Interests (DoI)

First Name	
Surname	
Authority/MS	
Current AMLA involvement	

I declare that I have read the *Practical arrangements for the prevention and management of conflicts of interest (Conflict of Interest Policy) for Non-Staff* (Annexed to the Rules of Procedure of the General Board of AMLA of XX 2025) and that I am aware of my obligations.

I do hereby declare on my honour that, to the best of my knowledge, the only interests that create a Conflict of Interest as defined in Article 1(6)(c) in respect of my activities which fall under AMLA's scope of action are those listed in the annex.

Whenever I have a Conflict of Interest, I will alert AMLA.

Date:	Signature:
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Please send a signed copy of this form to AMLA's Ethics Officer at ethics@amla.europa.eu.

Annex to Declaration of Interests

In all cases, please provide as many details as possible (in the case of a body or employer, full name, location, private or public nature and your role, if interest of close family member, whether interest is current or was in the past 2 years).

Interests to be declared in accordance with Art 1(7) of the Conflict of Interest Policy

Nature of interests	Period (from /till)	Organisation	Subject matter/ Reasons why my independence is impaired
I. Holding of Financial Instrument	1. 2.		
II. Membership in managing body or equivalent structure or a trade association	1. 2.		

Interests to be declared in accordance with Art 1(8) of the Conflict of Interest Policy

Nature of interests	Period (from /till)	Organisation	Subject matter/ Reasons why my independence is impaired
I. Economic Interest	1. 2.		
II. Membership in managing body or equivalent structure or a trade association	1. 2.		
III. Employment or Consultancy	1. 2.		

**Annex III to Practical arrangements for the prevention and management of conflicts of interest
- Conflict of Interest Policy for Non-Staff**

Declaration of Ethical Conduct (DEC)

**to be signed by accompanying persons who are not regular participants in the meetings of
the General Board of AMLA (Pursuant to Article 1(2) of the Policy)**

First Name	
Surname	
Authority/MS	

With regard to my participation in the meeting(s) of the General Board of AMLA, I hereby undertake to uphold the following standards of ethical conduct:

1. Respect for the basic principles

In the performance of my duties, I shall act with honesty, independence, impartiality, discretion and without regard to self-interest. I shall be mindful of the importance of my duties and responsibilities. I shall take into account the extent of my participation and its nature, and shall conduct myself accordingly in a way that maintains and promotes public trust in AMLA.

2. Avoidance of conflict of interest

I shall avoid any situation which could give rise or may be perceived as giving rise to a conflict of interest, as defined in Article 1 of AMLA's Conflict of Interest Policy for Non-Staff. I shall disclose to the Chair and AMLA's Ethics Officer in writing, without undue delay, any situation that may cause or be perceived as causing a conflict of interest, and shall abstain from taking part in any discussions or deliberations in relation to that situation and shall not receive any related documentation.

3. Professional secrecy and confidentiality

I shall treat in strictest confidence and not disclose any confidential information, as referred to in the General Board Decision on Rules of Procedure on Professional Secrecy for Non-Staff [*TO BE ADOPTED*] in accordance with Article 88 of the Regulation], even after duties and responsibilities as accompanying person in the General Board of AMLA have ceased.

4. Prohibition against use of confidential information (also in relation to private financial transactions)

I shall not use confidential information for my own benefit or for the benefit of any other person. In particular, I shall not take advantage of confidential information in any private financial transaction or in recommending or advising against such transactions.

For the purpose of this declaration of ethical conduct, the following definition applies:

“confidential information” means all information, facts, data and any other matters of which I acquire knowledge, either directly or indirectly, as a result of my AMLA activities whether or not contained in a document of any kind (electronic or on paper or any other medium).

I have read and understood this undertaking, and agree to its terms.

Date:	Signature:
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Please send a signed copy of this form to AMLA's Ethics Officer at ethics@amla.europa.eu.