THE ETHICS COMMITTEE

ECB-PUBLIC

[ECB/EC/19/4]

(TRANSMITTED ON 29 JULY 2019)

Mr Gottfried Haber
Vice-Governor of Oesterreichische Nationalbank

Subject: Notification of a gainful occupational activity[i] of a family member that may raise conflict-of-interest concerns – Ethics Committee Opinion

Dear Mr Haber,

Thank you for your letter, dated 22 July 2019, notifying the gainful occupational activity of your partner with Raiffeisen-Holding Niederösterreich-Wien, an Austrian less significant credit institution (LSI) which is not supervised directly by the ECB. In line with good administration, we have registered your notification.

Against this background, in order to effectively mitigate possible public perceptions that personal interests may negatively influence the impartial and objective performance of your tasks as a Supervisory Board member, the Ethics Committee recommends that mitigation measures should be put in place in the event of any matters directly related to the LSI in question being discussed/considered by the Supervisory Board. *In praxi* this means that you shall neither be granted access to related documents nor participate in discussions and deliberations nor exercise any voting rights (in meetings or written procedures); the Secretary of the Ethics Committee will inform the Secretary of the Supervisory Board accordingly.

In addition, the Ethics Committee recommends that you include a reference to your partner's gainful occupational activity in your Declaration of Interests.

As a final point, the Ethics Committee considers it opportune to remind you of the importance of respecting your professional secrecy obligations (Article 4 of the Single Code).

With best regards,

Chair of the ECB Ethics Committee (Jean-Claude Trichet)

Cc: A. Enria, Chair of the Supervisory Board
P. Senkovic, Secretary to the Supervisory Board

Disclaimer: