



EUROPEAN CENTRAL BANK
EUROSYSTEM

Luis de Guindos
Vice-President

Mr Roman Schremser
Secretary of the Ethics Committee
European Central Bank

Frankfurt am Main, 16 July 2018

Dear Mr Schremser,

In my capacity as Vice-President of the ECB, I would like to signal to the Ethics Committee a potential conflict of interest with my role and the professional roles of [REDACTED]

[REDACTED]

Yours sincerely,

Address
European Central Bank
Sonnemannstrasse 20
60314 Frankfurt am Main
Germany

Postal address
European Central Bank
60640 Frankfurt am Main
Germany

Tel.: +49 69 1344 7340
office.vice-president@ecb.europa.eu
Website: www.ecb.europa.eu

From: [REDACTED] on behalf of Schremser, Roman
To: patrick.honohan@[REDACTED]; klaus.liebscher@[REDACTED]
Cc: jean-claude.trichet@[REDACTED]; "office.trichet@[REDACTED]"; Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: FOR APPROVAL: EC WP - draft EC advices - ECB-RESTRICTED
Date: 06 September 2018 19:03:24
Attachments: [REDACTED] initial notification of professional roles of [REDACTED].pdf
[REDACTED] DRAFT EC Advice de Guindos.docx
Sensitivity: Confidential

Dear members,

On behalf of the Chairman please find attached, for your comments/approval [REDACTED] draft EC opinions:

i) ECB Vice-President, Luis de Guindos, has written to me (attached) about possible conflicts of interest regarding [REDACTED] employment; and

ii) [...]

I would be most grateful to receive your response by noon on Tuesday, 11 September 2018.

Best regards,

Roman

Disclaimer: the text above includes only those parts of the original document which were relevant for this particular public access request.

From: [REDACTED] on behalf of Schremser, Roman
To: de Guindos, Luis
Cc: [REDACTED] [jean-claude.trichet@\[REDACTED\]](mailto:jean-claude.trichet@[REDACTED]) Schremser, Roman
Bcc: Karvdi, Marguerite-Louise; [REDACTED]
Subject: EC Advice - Your notification of a possible conflict of interest - ECB-RESTRICTED
Date: 25 October 2018 17:12:00
Attachments: [REDACTED] [EC Letter Chair to Vice-President.docx](#)

Dear Vice-President,

On behalf of the Chairman, please find attached the ECB Ethics Committee's opinion regarding your notification of a possible conflict of interest between your role at the ECB and the professional role of [REDACTED].

The President and the Secretary to the ECB Decision-making bodies have been informed to ensure effective implementation of the advice; I am of course available for any questions you might have in this regard.

With kind regards,
Roman

From: [REDACTED] on behalf of Schremser, Roman
To: Draghi, Mario
Cc: Office President; jean-claude.trichet@[REDACTED]; "office.trichet@[REDACTED]"; Schremser, Roman; Karvi, Marquerite-Louise; [REDACTED]
Subject: EC Advice - Vice President's notification of a possible conflict of interest - ECB-RESTRICTED
Date: 25 October 2018 16:57:00
Attachments: [REDACTED] EC Letter - Chair to President - Advice de Guindos.docx

Dear President,

On behalf of the Chairman, please find attached the ECB Ethics Committee's opinion regarding the Vice-President's notification of a possible conflict of interest between his role at the ECB and the professional roles of [REDACTED].

In order to effectively mitigate possible public perceptions that private or personal interests may negatively influence the impartial and objective performance of the Vice-President's tasks in relation to [REDACTED] current occupational activity with a directly supervised credit institution, the Ethics Committee, amongst other measures, recommended the Vice-President to recuse himself from any discussion/consideration of the ECB decision-making bodies on matters directly related to the bank in question.

Please note that for the effective implementation of this advice, a separate communication has been sent to the Secretary of the EB & GovC and the Office of the Vice-President.

With kind regards,
Roman

From: Schremser, Roman
To: "jean-claude.trichet@"; patrick.honohan@; erkki@
Cc: Office.trichet@; ; Karydi, Marguerite-Louise; ;
Subject: EC meeting documentation - ECB-RESTRICTED
Date: 16 February 2019 09:23:20
Attachments: DRAFT EC Advice OR.docx
[...]

Importance: High

Dear members,

Please find attached documentation for next week's EC meeting.

[...]

With best regards,

Roman

[...]

Disclaimer: the text above includes only those parts of the original document which were relevant for this particular public access request.

From: [REDACTED] on behalf of [Schremser, Roman](#)
To: [REHN, Olli](#)
Cc: [jean-claude.trichet@](#)[REDACTED]; Office President; [Schremser, Roman](#); [REDACTED]; [REDACTED]
Subject: ECB Ethics Committee assessment re. possible conflict of interest concerns - ECB-RESTRICTED
Date: 21 February 2019 17:52:06
Attachments: [REDACTED].EC Advice ORehn.pdf
image001.png

Dear Governor Rehn,

On behalf of the Chairman, please find attached the ECB Ethics Committee's assessment regarding your notification, through your Declaration of Interests, of the gainful occupational activity of [REDACTED] which may raise conflict of interest concerns.

With best regards,
Roman Schremser



Roman Schremser
ECB Chief Compliance and Governance Officer
Directorate General Secretariat
European Central Bank
Sonnemannstr. 20
60314 Frankfurt am Main
Tel: +49 (0) 69 1344 [REDACTED]
Fax: +49 (0) 69 1344 [REDACTED]
Mob: +49 (0) [REDACTED]
e-mail: roman.schremser@[REDACTED]



Roman Schremser
Secretary to Ethics Committee
European Central Bank
Roman.Schremser@ [REDACTED]

Via E-mail
13 March 2019

A Potential Conflict of Interests

Dear Mr Schremser,

I am writing to ask for your advice and possibly that of the Ethics Committee on whether I should consider [REDACTED] employment to be a potential or perceived conflict of interests for me as a member of the SSM Supervisory Board. Depending on your answer, I would appreciate your suggestions on whether I should include a reference on that in my Declaration of Interests or possibly take some further steps.

[REDACTED] is working as a manager and an executive board member of a non-profit organisation in the field of education. It is called [REDACTED]

I have never felt that all the above could in any way influence whatever decisions I am taking that affect [REDACTED], but I want to be sure that I am acting in accordance with any rules that I am subject to given my role at the ECB.
Thank you in advance for your advice.

Kind regards,

Madis Müller
Deputy Governor

From: [REDACTED] on behalf of Schremser, Roman
To: [patrick.honohan@\[REDACTED\]](mailto:patrick.honohan@[REDACTED]); [erkki@\[REDACTED\]](mailto:erkki@[REDACTED])
Cc: [jean-claude.trichet@\[REDACTED\]](mailto:jean-claude.trichet@[REDACTED]); "office.trichet@[REDACTED]"; Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: FOR APPROVAL: Draft EC Advice - ECB-RESTRICTED
Date: 20 March 2019 17:56:00
Attachments: [REDACTED] DRAFT EC Advice MM.docx
Letter Potential Conflict of Interests.pdf

Dear members,

On behalf of the Chairman, may I seek **your comments/approval** of the attached draft ethics advice by noon on Friday, 22 March 2019.

Many thanks & kind regards,
Roman

From: [REDACTED] on behalf of Schremser, Roman
To: Müller, Madis ©
Cc: [jean-claude.trichet@\[REDACTED\]](mailto:jean-claude.trichet@[REDACTED]); Enria, Andrea; [REDACTED] Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: ECB Ethics Committee assessment re. possible conflict of interest concerns - ECB-RESTRICTED
Date: 25 March 2019 13:49:00
Attachments: [REDACTED] [EC Advice MMüller.pdf](#)

Dear Mr Müller,

on behalf of the Chairman, please find attached the ECB Ethics Committee's response to your letter informing about [REDACTED] position with a non-profit organisation in the field of education.

With best regards,
Roman Schremser

APR 25 2019

Prof. Dr. Joachim Wuermeling
Member of the Executive Board

Mr Jean-Claude Trichet
Chairman of the Ethics Committee
Mr Andrea Enria
Chairman of the Supervisory Board
European Central Bank
Sonnemannstraße 20
60314 Frankfurt am Main

Frankfurt, 18th April 2019

Notification according to Article 11.2 Code of Conduct for High-Level ECB Officials

Dear Chairmen,

Being a member of the SSM Supervisory Board I would like to avoid any situation which may raise conflict of interest concerns. Therefore, in accordance with Article 11.2 first sentence of the Code of Conduct for High-Level ECB Officials, I hereby disclose that [REDACTED]

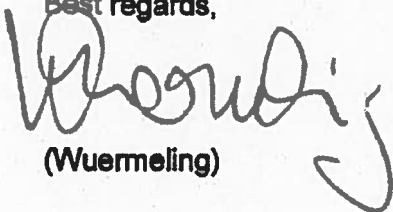
has held the position of [REDACTED]

[REDACTED] a credit institution directly supervised by the ECB, since [REDACTED]

Until the Ethics Committee has reached its decision in this respect, I offer to recuse myself from taking part in any discussions, deliberations or votes in relation to [REDACTED] and offer not to access any related documentation.

Should you require further information, please do not hesitate to contact me.

Best regards,


(Wuermeling)

From: [REDACTED] on behalf of Schremser, Roman
To: [patrick.honohan@\[REDACTED\]](mailto:patrick.honohan@[REDACTED]); [erkki@\[REDACTED\]](mailto:erkki@[REDACTED])
Cc: [jean-claude.trichet@\[REDACTED\]](mailto:jean-claude.trichet@[REDACTED]); "office.trichet@[REDACTED]"; Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: FOR APPROVAL: Draft EC Advice - ECB-RESTRICTED
Date: 02 May 2019 12:33:00
Attachments: [REDACTED].EC Advice Wuermeling.docx
2019-04-25 Letter from Dr Wuermeling re Code of Conduct .pdf

Dear members,

On behalf of the Chairman, may I seek **your comments/approval** of the attached draft ethics advice by **noon on Monday, 6 May 2019**.

Many thanks & kind regards,
Roman

From: [REDACTED] on behalf of Schremser, Roman
To: "joachim.wuermeling@[REDACTED]"
Cc: jean-claude.trichet@[REDACTED] fr; Enria, Andrea; Office Chair Supervisory Board; Senkovic, Petra; Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: ECB Ethics Committee assessment re. possible conflict of interest concerns - ECB-RESTRICTED
Date: 06 May 2019 15:46:00
Attachments: [REDACTED].EC Advice Wuermeling.pdf

Dear Mr Wuermeling,

On behalf of the Chairman, please find attached the ECB Ethics Committee's response to your letter informing about [REDACTED] position with a [REDACTED] significant credit institution.

With best regards,
Roman Schremser

Mr.
Jean-Claude Trichet
Chairman of the Ethics Committee
European Central Bank
Sonnemannstraße 20
60314 Frankfurt am Main
Germany

Gottfried Haber
Vice-Governor

Wien, 22 July 2019

Re: Art 12 Code of Conduct for High-Level ECB Officials – notification of gainful occupation of partner

Dear Mr. Trichet !

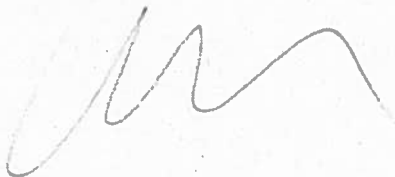
referring to Art 12 of the Code of Conduct for High-Level ECB Officials I would like to inform you about the gainful occupation of my partner for further consideration.

Gainful occupational activity: [REDACTED]

Institution: Raiffeisen-Holding Niederösterreich-Wien reg. Gen.m.b.H. and
Raiffeisenlandesbank Niederösterreich-Wien AG

Timeframe: [REDACTED] – ongoing

Best regards



Cc/ Mr. Andrea Enria
Chairman of the Supervisory Board

From: Schremser, Roman
To: patrick.honohan@ [REDACTED]; erkki@ [REDACTED]
Cc: jean-claude.trichet@ [REDACTED]; Office.trichet@ [REDACTED]; Karydi, Marguerite-Louise; [REDACTED]
Subject: FOR APPROVAL: draft EC Advice SB Member
Date: 24 July 2019 14:48:46
Attachments: [REDACTED] EC draft Advice Haber.docx

Dear members,

On behalf of the Chairman, please find attached, **for your approval by noon on Friday, 26/07/19**, a **draft advice** on the new Austrian SB member (NCB), who notified his partner's occupational activity with a credit institution.

[REDACTED]

Many thanks & kind regards,
Roman

From: [REDACTED] on behalf of Schremser, Roman
To: [REDACTED]
Cc: [jean-claude.trichet@\[REDACTED\]](mailto:jean-claude.trichet@[REDACTED]); Enria, Andrea; Office Chair Supervisory Board; Senkovic, Petra; Schremser, Roman; Karydi, Marguerite-Louise; [REDACTED]
Subject: RE: Art12 Code of Conduct for High-Level ECB Officials
Date: 29 July 2019 15:09:19
Attachments: [REDACTED].EC Advice GHaber.docx

Dear Ms [REDACTED],

On behalf of the Chairman, please find attached the ECB Ethics Committee's response to Mr Haber's letter informing about his partner's gainful occupation with an Austrian less-significant credit institution.

With best regards,

Roman Schremser

Disclaimer: the text above includes only those parts of the original document which were relevant for this particular public access request.

From: Schremser, Roman
To: vrcanter@[REDACTED] erkki@[REDACTED]
Cc: patrick.honohan@[REDACTED]; Karydi, Marquente-Louise; [REDACTED]
Subject: RE: 14th EC meeting documentation - ECB-RESTRICTED
Date: 19 October 2019 16:05:12
Attachments: [...]

[REDACTED] [DRAFT EC Advice KAJ.docx](#)

Dear members,

On behalf of the Chairman, please find attached documentation for [REDACTED] next week's Ethics Committee meeting.

[...]

With best regards,

Roman

[REDACTED] – **Assessment of requests for ethics advice**

ECB SB member Kerstin af Jochnick

Disclaimer: the text above includes only those parts of the original document which were relevant for this particular public access request.

From: [REDACTED] on behalf of [Schremser, Roman](#)
To: [af Jochnick, Kerstin](#)
Cc: [patrick.honghan@\[REDACTED\]](#); [Enria, Andrea](#); [Office Af Jochnick](#); [Schremser, Roman](#); [Karydi, Marguerite-Louise](#); [REDACTED]
Subject: ECB Ethics Committee - your request for advice - ECB-RESTRICTED
Date: 25 October 2019 16:14:00
Attachments: [REDACTED].FINAL_EC Advice KAJ.docx

Dear Kerstin,

On behalf of the Chairman, please find attached the ECB Ethics Committee's response to your notification about the occupation of your spouse.

With best regards,
Roman



LATVIJAS BANKA
EIROSISTĒMA

K. VALDEMĀRA IELA 2A • RĪGA • LV-1050 • LATVIA • TELEPHONE +371 67022300 • FAX +371 67022420 • E-MAIL INFO@BANK.LV • WWW.BANK.LV

ECB-CONFIDENTIAL

Riga, 6 January 2020
Our ref.: 001-08.1.1/2020/19

Ms. Christine Lagarde
President
Mr. Patrick Honohan
Chairman of the Ethics Committee
European Central Bank
Sonnemannstraße 20
60314 Frankfurt am Main
Germany

Compliance with the Code of Conduct – a potential conflict of interest

Dear President Lagarde, dear Mr. Honohan,

In reference to Article 11.2 of the Code of Conduct for High-Level ECB Officials, I am writing to notify you of a potential conflict of interest issue that may arise in relation to my participation in decision-taking or voting in the capacity of a member of the ECB Governing Council.

In light of my previous professional activity and also financial transactions, including mortgage loan and leasing agreements, in "Swedbank" AS, I consider that my participation in any decision-making in relation to that entity might be perceived as impairing my impartiality or objectivity.

In order to avoid such possibility, I recuse myself from taking part in any discussions, deliberations or votes that refer to the abovementioned entities. For your information, the relevant staff of Latvijas Banka have been already instructed, as per day of assuming of my duties, to exclude me from the recipients of the documents bearing any reference to the said entity.

I thank you in advance for considering my letter.

Yours sincerely,



Mārtiņš Kazāks
Governor

cc: Mr. Roman Schremser, Chief Compliance and Governance Officer
Mr. Pedro Gustavo Teixeira, Director General, DG Secretariat

From: [REDACTED] on behalf of Schremser, Roman

To: "Ginny Canter"; erkki@[REDACTED]

Cc: patrick.honohan@[REDACTED]; Schremser, Roman; Karvdi, Marguerite-Louise [REDACTED]

Subject: FOR APPROVAL - draft EC advice - ECB-RESTRICTED

Date: 31 January 2020 10:51:00

Attachments: [REDACTED]_EC Advice MKazaks.docx
LV_potential conflict of interest_2020-01.pdf

Dear members,

On behalf of the Chairman, may I seek **your comments/approval** of the attached draft ethics advice in response to the letter from Governor of the Central Bank of Latvia, Martinš Kazaks, regarding a possible conflict of interest relating to his participation in decision-making as ECB Governing Council member in light of his previous professional activity in Swedbank AS, a Latvian significant credit institution which is directly supervised by the ECB.

I would be grateful for your response by **noon on Tuesday, 4 February 2020**.

Many thanks & best regards,
Roman

From: [REDACTED] on behalf of [Schremser, Roman](#)
To: [REDACTED]
Cc: [Office President](#); [patrick.honghan](#); [Senkovic, Petra](#); [Schremser, Roman](#); [Karydi, Marguerite-Louise](#); [REDACTED]
Subject: ECB Ethics Committee - Governor Kazaks' request for advice - ECB-RESTRICTED
Date: 03 February 2020 15:48:23
Attachments: [REDACTED] [.EC Advice M. Kazaks.pdf](#)

Dear [REDACTED],

On behalf of the Chairman, please find attached the ECB Ethics Committee's response to Governor Kazaks' letter of 6 January informing about a possible conflict of interest.

With best regards,
Roman