



Brussels, 6th November 2019

For the attention of: **Mr. José Manuel Campa, Chairperson of the European Banking Authority**

Subject: **Declaration of interest and Banco Santander shares**

Dear Mr José Manuel Campa,

As Greens/EFA Members of the European Parliament, we would like to ask for further clarification regarding your declaration of interest, in particular your holdings of Banco Santander shares and the consequent restriction in your duties issued by the appointing authority. It is with great concern that we witness you will keep until February 2023 shares in Banco Santander, your former employer and a Global Systemically Important Institution that EBA will monitor and supervise during this period.

The rule of the Staff Regulation, reflecting Article 49 of the EBA Regulation (1093/ 2019), is clear about situations of this nature: *“an official may neither keep nor acquire, directly or indirectly, in undertakings which are subject to the authority of the institution to which he belongs or which have dealings with that institution, any interest of such kind or magnitude as might impair his independence in the performance of his duties”*

In the restriction issued by the Appointing Authority subsequent to your declaration of interest, you are required to divest yourself of your shares within 30 days of the retention period applicable to those shares. It is also established that “for 24 months from the date of your entry into service with the EBA” you are not allowed “to have professional contact with staff or representatives of Banco Santander in the context of lobbying and advocacy.” However, in your declaration of interest it appears that you will maintain these shares until February 2023 while the lobby and advocacy restriction will only last until 2021. This means that from 2021 until February 2023, namely for a period of one year and a half, you would be a shareholder of Santander dealing directly with the bank representatives without any further restrictions.

As the data about the nominal value and number of shares has been deleted in your declaration of interest and we do not have any further information about the shares and the reasons behind the retention period until February 2023, we would like to formally request a detailed explanation of the compliance of your situation with Regulation 1093/ 2019 and the relevant rules of the staff regulation.

After the revolving doors case with the Adam Farkas scandal, the EBA reputation cannot afford any other serious doubts about its integrity and independence. Therefore, we would also strongly suggest finding a way to fully divest your Banco Santander portfolio as soon as possible.

Yours sincerely,

Philippe Lamberts,

Sven Giegold,

Ernest Urtasun,

**Greens/EFA Members of the European Parliament**