

Register of Interests of Members of the International Board of Directors: Guidelines

TI cannot expect of others higher standards of integrity than it applies to itself and to all individuals whose contribution to TI is important. We understand that the full completion of a Register of Interests is a fundamental aspect of integrity. Moreover, the Register is a 'living' document, in that circumstances change, and a situation, which previously raised no issue of potential conflict can suddenly be transformed into an issue where disclosure is imperative.

Completion of the Register of Interests is not a 'box-ticking' exercise. Those completing the Register are expected to think about the appearance of a conflict of interest and to disclose it, even when they are satisfied that no actual conflict exists. On the other hand, there is no point in filling the Register with entries where the risk of conflict is non-existent or never likely to arise.

Those completing the Register are also reminded that TI's Policy extends beyond the individual to include the interests of persons "with whom they have a close personal relationship". This means that if such a person could be seen in any capacity as having an interest, which could conflict with an interest of TI, disclosure should be made.

A potential conflict of interest does not cease at the moment when an individual leaves an organisation. TI has always recognised the dangers of the "revolving door". Thus the Register should include details of those past associations where current circumstances have placed that past association into a potentially conflicting light.

1. Each Member of the International Board of Directors shall declare in this Register any and all interests that could potentially lead to, or could conceivably be perceived as, a conflict of interest. Such interests shall include, but not be limited to,
 - a. Any current or past remunerated affiliation (employment or directorship) with a public or private company or other organization, including longer-term or frequent relationships but excluding one-off short-term consultancies,
 - b. Any current or past non-remunerated affiliation with any public or private company or other organization,
 - c. Significant (>10%) ownership or controlling position in any company or other organization,
 - d. Any entity in which the member have more than 5% of their total assets (company shares, public/private bonds or other kind of debts, investment-funds shares, etc),
 - e. Any pension,
 - f. Any current or past public office or public employment,
 - g. Interests of persons with whom the Member has a close personal relationship, according to Section 1 or TI Conflict of Interests Policy.
2. As set forth in Section 2(c) of the Conflict of Interest Policy, this Register is open to the public.
3. The filing in this Register shall be made within three weeks of taking up the position of a Member of the Board of Directors and shall be updated in a timely fashion as changes occur and at least once a year.
4. In case of doubt, a Member may request advice from the Board Ethics Committee as to whether an interest that is subject to registration exists.

Register of Interests Form

Name	SILVINA BACIGALUPO SAGGESE
Remunerated affiliation (Current and, where relevant, past)	Professor of Criminal Law (Full professor). University Autónoma de Madrid/SPAIN.
Non-remunerated affiliation (Current and, where relevant, past)	Madrid Bar Association.
Significant (>10%) ownership or controlling position in any company	Non.
Any entity in which the person has more than 5% of his/her total assets	Non.
Public Office or public employment (Current and, where relevant, past)	University Professor.
Interests of close personal relationship (where applicable). See Conflict of Interests Policy, section 1)	Non.
Other	Non

Date: 16.02.2026

Signature of Member: