



EUROPEAN CENTRAL BANK
BANKING SUPERVISION

Template for comments

ECB Guide to fit and proper assessments and fit and proper Questionnaire

Institution/Company

SPANISH BANKING ASSOCIATION

Contact person

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First name

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Email address

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General comments

Besides the general comments made by the Spanish Banking Association in the European Banking Federation's response to this public consultation, which we completely support, we would like to add the following on item 3.4.3.1 Quantitative assessment:

"Point 3.4.3.1 Quantitative assessment.

It would be desirable to clarify that for purposes of the calculation of the maximum number of directorships that non-executive directorships held by executive directors in investee entities, where the entity in which the director is an executive has the the right or ability to appoint the executive director to such directorship in the investee entity, are aggregated and count as a single directorship with the executive directorship. This is appropriate as the executive role naturally encompasses the representation in the investee company of the interests of the company in which the director is an executive"



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