From: To: Cc: Subject:
Date: Attachments:
Dear Sir/Madam
O behalf of we would appreciate to include the following topics/questions for the Public hearing to be held on 15 July 2021:
1. Appointment of General Managers in new branches In the "Scope of the ECB's fit and proper assessment", it is included the need to evaluate the Branch General Managers. Would this be applicable for new branches as well or just when there is a General
Manager replacement in an already existing branch? According to our NCA information, the General Manager fit and proper process in a new branch is already included in the branch creation file (and therefore it would not be necessary to submit a second one). Kindly confirm that our interpretation and understanding are correct.
2. Climate-related and environmental risks Regarding the Collective Suitability, the new approach includes the "Climate-related and environmental risks". We would like to know how to evaluate and provide an evidence for this skill for future cases, and the expectation from the regulators in this regard.
Kind Regards,