



Updated Fit and proper Questionnaire – ECB template

Supervised entities and appointees may use the relevant national questionnaire available via the information management system (IMAS) portal.

Follow the links to the portal on **the NCA website**¹ and the European Central Bank (ECB) Banking Supervision website.

Fit and proper Questionnaire – ECB template

This is an ECB document adopted by the Supervisory Board on 20 May 2021 as a template to be used by national competent authorities (NCAs). NCAs are asked to implement the questionnaire using the content and layout shown in the template, also including the agreed national specificities and taking into consideration the technical implementing instructions that will be provided. This template is to be used as a guide to the information that the ECB and the NCAs expect to receive in order to assess the fitness and propriety of appointees.

The questionnaire should be read in conjunction with Article 91 of Directive 2013/36/EU (CRD),² the relevant guidelines of the European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA) and applicable national law. The appointee and the supervised entity are jointly responsible for providing the ECB and the NCA with complete and accurate information regarding the proposed appointment. Providing inaccurate or incomplete information causes delays in the assessment and may make it impossible to take a positive decision. In addition, both the appointee and the supervised entity have a responsibility to disclose to the NCA all matters that may be relevant to the assessment. You must be candid and truthful and provide a full and accurate response to all the questions. If you are uncertain how to respond to any part of the questionnaire, please give as much information as possible in the text boxes provided.

¹ [Link to the NCA website].

² Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC (OJ L 176, 27.6.2013, p. 338).

Declaration by the appointee

This declaration concerns an application or notification regarding the appointment of a *text field for function* in accordance with the relevant national law. It will be reviewed by [name of the NCA] and the European Central Bank (ECB).

The undersigned:

- confirms that the information provided in this questionnaire and in the annexes attached hereto is accurate and complete to the best of his/her knowledge;
- confirms that s/he will notify [the name of the supervised entity] immediately if there is a material change³ in the information provided;
- authorises the ECB and [name of the NCA] to make such enquiries and seek such further information as is deemed appropriate in accordance with European and national law in order to identify and verify information considered relevant to the fit and proper assessment;
- confirms that s/he is aware of his/her responsibilities arising from European and national legislation and international standards, including regulations, codes of practice, guidance notes, guidelines and any other rules or directives issued by [the NCA] or by the ECB and the European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA), which are relevant to the function for which a positive assessment is sought, and also confirms the intention to ensure continued compliance with such responsibilities;
- declares that s/he is aware of the processing and storage of personal data in accordance with the applicable data protection regulations and the [privacy statement of the ECB](#) and [the NCA];
- declares that s/he is aware that providing false or incomplete information may constitute grounds for refusal or withdrawal of the fit and proper authorisation, without prejudice to the possible imposition of legal and/or administrative sanctions.

Name:

Signature:

Date:

³ A material change is any change that may affect the suitability of the appointee.

Declaration by the supervised entity

This declaration concerns an application or notification regarding the appointment of a *text field for function* in accordance with the relevant national law. It will be reviewed by [name of the NCA] and the European Central Bank (ECB).

The undersigned:

- confirms that the information provided in this questionnaire and in the annexes attached hereto is accurate and complete to the best of his/her knowledge;
- confirms that the supervised entity will notify [name of the NCA] immediately if there is a material change in the information provided;
- confirms that the supervised entity has requested the full and most up-to-date information necessary to assess the appointee's suitability [in accordance with the applicable regulations/statutory provisions] and that it has given due consideration to that information in determining the appointee to be fit and proper;
- confirms that the description of the function for which a positive assessment is sought accurately reflects the aspects of the activities of the supervised entity for which it is intended that the appointee will be responsible;
- confirms that the supervised entity believes, on the basis of due and diligent enquiry and by reference to the fit and proper criteria as laid down in [national and European law, international standards, including regulations, codes of practice, guidance notes, guidelines and any other rules or directives issued by the [NCA] or by the ECB and the European Banking Authority (EBA) and the European Securities and Markets Authority (ESMA), that the appointee is a fit and proper person to perform the function as described in this questionnaire;
- confirms that the supervised entity has made the appointee aware of the legal and regulatory responsibilities associated with the function as described in this questionnaire;
- confirms that the documents provided in the annexes are copies of the documents originally provided by the supervised entity or by the appointee that are kept in the archives of the supervised entity;
- confirms that s/he has authority to issue this notification/application and provide the declarations made by the supervised entity, and to sign this questionnaire on its behalf;
- declares that s/he is aware of the processing and storage of personal data in accordance with the applicable data protection regulations and the [privacy statement of the ECB](#) and [the NCA].

Name of the supervised entity:

Name(s) of the signatory (or signatories):

Position(s) in the supervised entity:

Signature(s):

Date:

Identity of the supervised entity and appointee

IMPORTANT: throughout section 1 “you” means “the appointee”

Information on the supervised entity	
Name of the supervised entity	Free text
Legal Entity Identifier Code	Free text
National company code	Free text
Is the supervised entity a “CRD significant institution” in accordance with “national law”? ⁴	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
Governance model of the supervised entity	<input type="checkbox"/> One-tier model <input type="checkbox"/> Two-tier model <input type="checkbox"/> Other model
If “Other model” is selected, please specify which governance model is used	Free text
Contact person within the supervised entity (name/email/phone number)	Free text

Information on the appointee	
A	
Name	
Gender	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Family name	Free text
First name	Free text
Middle name(s)	Free text
Have you had or used other names at any time?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If “Yes” is selected, please provide the following details, specifying all names that you have ever used (e.g. family name at birth, other legal names, assumed names)	
Gender	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Family name	Free text
First name	Free text
Middle name(s)	Free text
Date of name change	(YYYY-MM)

⁴ [If applicable] According to Article XX of [national law].

B**Current residence**

Address	Free text
Postcode and city	Free text
Country	Free text
Start date of residence at this address:	Calendar (YYYY-MM)
Have you lived in a country other than your current country of residence at any time during the past five years?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If "Yes" is selected, please specify which country (or countries) and the period(s) of residence.	Free text
Is your permanent residence different from your current residence?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If "Yes" is selected, please provide the following details	
Address of your permanent residence	Free text
Postcode and city	Free text
Start date of residence at this address	(YYYY-MM)

C**Other information on the appointee**

Date of birth	(YYYY-MM-DD)
Place of birth	Free text
Country	Free text
Nationality (or nationalities)	Free text
Number of current valid identity document or passport	Free text
Contact phone number (including country code)	Free text
Email address	Free text

D

Previous supervisory assessments

Have you ever been subject to any supervisory assessment in the financial sector (including assessments for functions abroad ⁵)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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If "Yes" is selected, please provide the following details

Competent authority involved	Institution involved	Function involved
Free text	Free text	Free text
Start date of the term of office	End date of the term of office	Date of the decision (if not applicable, date of application for an assessment)
(YYYY-MM)	(YYYY-MM)	(YYYY-MM-DD)

If any previous assessment has resulted in a negative decision, withdrawal of authorisation, or a positive assessment but with conditions, recommendations or obligations, please explain the reasons for this

Free text

E

Grounds to suspect money laundering or terrorist financing

Are you aware or have you been informed by the supervised entity of any reasonable grounds to suspect that money laundering or terrorist financing is being or has been committed or attempted, or whether there is any increased risk thereof in connection with the supervised entity or its group?	<input type="checkbox"/> Yes <input type="checkbox"/> No
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If "Yes" is selected, please provide details

Free text

⁵ The term "abroad" means any territory outside of the scope of competence of the ECB or of the NCA of the supervised entity to which you are being appointed.

Function for which the questionnaire is submitted

Information on the function for which the questionnaire is submitted	
State the name of the function (to be) held Free text	
Select whether the function is executive, non-executive, key function holder or branch manager	<input type="checkbox"/> Executive <input type="checkbox"/> Non-executive <input type="checkbox"/> Key function holder <input type="checkbox"/> Branch manager
Select the specific function	<input type="checkbox"/> Member of the management body in its management function <input type="checkbox"/> Chair of the management body in its management function <input type="checkbox"/> Deputy Chair of the management body in its management function <input type="checkbox"/> Chief Executive Officer (CEO) <input type="checkbox"/> Deputy Chief Executive Officer (Deputy CEO) <input type="checkbox"/> Chief Financial Officer (CFO) <input type="checkbox"/> Chief Risk Officer (CRO) <input type="checkbox"/> Member of the management body in its supervisory function <input type="checkbox"/> Chair of the management body in its supervisory function <input type="checkbox"/> Deputy Chair of the management body in its supervisory function <input type="checkbox"/> Manager of a foreign branch <input type="checkbox"/> Head of the compliance function <input type="checkbox"/> Head of the internal audit function <input type="checkbox"/> Head of the risk management function
Provide a detailed description of the duties, responsibilities and reporting lines of the function. Please specify which other functions, if any, the appointee will exercise within the supervised entity Free text	
Specify which committee positions the appointee will hold owing to the function (if applicable and already known when completing this questionnaire)	<input type="checkbox"/> Chair of the audit committee <input type="checkbox"/> Chair of the remuneration committee <input type="checkbox"/> Chair of the risk committee <input type="checkbox"/> Chair of the nomination committee <input type="checkbox"/> Chair of any other committee <input type="checkbox"/> Member of the audit committee <input type="checkbox"/> Member of the remuneration committee <input type="checkbox"/> Member of the risk committee <input type="checkbox"/> Member of the nomination committee <input type="checkbox"/> Member of any other committee
Specify whether the appointee will be qualified as a formal independent ⁶ member of the management body in its supervisory function	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
Is the application for the renewal of an appointment?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Additional details about the (planned) start date and length of the term of office ⁷	
(Planned) date of the formal decision on the appointment issued by the competent governance body of the supervised entity	(YYYY-MM-DD)
(Planned) start date of the term of office	(YYYY-MM-DD)

⁶ [If applicable] According to Article XX of [national law].

⁷ In case these dates are not certain, please indicate an estimate date.

(Planned) end date of the term of office	(YYYY-MM-DD)
Is the appointee replacing another person?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If "Yes" is selected, please state the name of the person being replaced and the reasons for the replacement Free text	
Is the application or notification submitted within the time period stipulated in "national law" ⁸	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable
If "No" is selected, please state the reasons Free text	

⁸ [If applicable] According to Article XX of [national law].

Experience

A				
Education				
Official degree or certificate	Level of educational qualification obtained	Field of study	Date issued	Educational organisation (e.g. university, centre of studies, etc.)
Free text	<input type="checkbox"/> Bachelor <input type="checkbox"/> Master <input type="checkbox"/> Phd <input type="checkbox"/> Certificate <input type="checkbox"/> Other	Free text	(YYYY-MM)	Free text

B				
Practical experience related to banking and/or the financial sector gained in the last ten years				
Position	Main responsibilities	Degree of seniority of the position / hierarchical level	Name of the entity. Please indicate the nature of the business and/or type of licence	Size (total assets in EUR millions)
Free text	Free text	<input type="checkbox"/> Senior level <input type="checkbox"/> High level <input type="checkbox"/> Other managerial <input type="checkbox"/> Other	Free text	<input type="checkbox"/> <1 <input type="checkbox"/> >1<3 <input type="checkbox"/> >3<10 <input type="checkbox"/> >10<30 <input type="checkbox"/> >30<50 <input type="checkbox"/> >50
Number of subordinates (in hundreds)	Areas of activity	Held from	Held to	Reason for leaving the position (if applicable)
<input type="checkbox"/> <1 <input type="checkbox"/> >1<5 <input type="checkbox"/> >5<10 <input type="checkbox"/> >10<50 <input type="checkbox"/> >50<100 <input type="checkbox"/> >100<500 <input type="checkbox"/> >500	Free text	(YYYY-MM)	(YYYY-MM)	<input type="checkbox"/> Resignation <input type="checkbox"/> End of mandate <input type="checkbox"/> Moved to a new position <input type="checkbox"/> Promotion <input type="checkbox"/> Other reason

C

Other relevant experience outside of banking and/or the financial sector (e.g. academic positions, political mandates, other non-commercial mandates, or other specialised experience)

Position	Main responsibilities	Degree of seniority of the position / hierarchical level	Name of the entity. Please indicate the nature of the business and/or type of licence	Size (total assets in EUR millions)
Free text	Free text	Free text	Free text	<input type="checkbox"/> <1 <input type="checkbox"/> >1<3 <input type="checkbox"/> >3<10 <input type="checkbox"/> >10<30 <input type="checkbox"/> >30<50 <input type="checkbox"/> >50
Number of subordinates (in hundreds)	Areas of activity	Held from	Held to	Reason for leaving the position (if applicable)
<input type="checkbox"/> <1 <input type="checkbox"/> >1<5 <input type="checkbox"/> >5<10 <input type="checkbox"/> >10<50 <input type="checkbox"/> >50<100 <input type="checkbox"/> >100<500 <input type="checkbox"/> >500	Free text	(YYYY-MM)	(YYYY-MM)	<input type="checkbox"/> Resignation <input type="checkbox"/> End of mandate <input type="checkbox"/> Moved to a new position <input type="checkbox"/> Promotion <input type="checkbox"/> Other reason

D

Does the appointee meet the presumption of adequate experience in Tables 1 and 2 of Section 3.1.3.2 of the Guide to fit and proper assessments?

- Yes
 No

If "No" is selected, please list below any potential complementary (or compensating) factors as provided for in the Guide to fit and proper assessments

Free text

E

Assessment of the level of banking experience

General banking experience, including, inter alia, in the fields indicated in EBA/GL/2017/12	Assessment of the level of experience (high, medium-high, medium-low, low)	Justification of your answer
banking and financial markets	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
legal requirements and regulatory framework, including in the field of prevention of money laundering and terrorist financing	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
strategic planning, the understanding of a credit institution's business strategy or business plan and accomplishment thereof	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
risk management (identifying, assessing, monitoring, controlling and mitigating the main types of risk of a credit institution)	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
knowledge and experience of climate-related and environmental risks	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
accounting and auditing	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
assessing the effectiveness of a credit institution's arrangements, ensuring effective governance, oversight and controls	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text
interpreting a credit institution's financial information, identifying key issues based on this information and appropriate controls and measures	<input type="checkbox"/> High <input type="checkbox"/> Medium-high <input type="checkbox"/> Medium-low <input type="checkbox"/> Low	Free text

F

Has the appointee undertaken any relevant training in the last five years? Yes
 No

If "Yes" is selected, please provide details of the training

Content of the training	Length (hours)	Start date	End date
Free text	Free text	(YYYY-MM)	(YYYY-MM)

G

Will the appointee undertake training prior to the commencement of the function or within the first year of the commencement of the function?⁹

- Yes
 No

If "Yes" is selected, please provide details of the training

Content of the training	Training provider (specify whether the provider is internal or external and state the names of external organisations)	Term (hours)	Start date	End date
<input type="checkbox"/> banking and financial markets <input type="checkbox"/> legal requirements and regulatory framework, including in the field of prevention of money laundering and terrorist financing <input type="checkbox"/> strategic planning, the understanding of a credit institution's business strategy or business plan and accomplishment thereof <input type="checkbox"/> risk management (identifying, assessing, monitoring, controlling and mitigating the main types of risk of a credit institution) <input type="checkbox"/> risk management of climate-related and environmental risks; <input type="checkbox"/> accounting and auditing <input type="checkbox"/> assessing the effectiveness of a credit institution's arrangements, ensuring effective governance, oversight and controls <input type="checkbox"/> interpreting a credit institution's financial information, identifying key issues based on this information and appropriate controls and measures <input type="checkbox"/> other. In this case, please indicate on the right the content of the training	Free text	Free text	(YYYY-MM)	(YYYY-MM)

⁹ The response to this question will be taken as confirmation of the Supervised Entity that the training programme will take place as shown.

Reputation

IMPORTANT: throughout section 4 “you” means “the appointee personally” and also includes all corporate entities, partnerships or unincorporated entities with which the appointee is or has been associated as a board member¹⁰, key function holder, senior manager, owner, partner, associate, or qualifying shareholder. Information should be provided only for alleged wrongdoing which happened in the period in which the appointee was associated with the entity.

The answers to the questions below must include any situations that occurred in countries outside the European Union.

A	
<p>Are you or have you been subject to any criminal¹¹ or relevant administrative or civil proceedings¹² (including any that are pending, concluded or under appeal)? Investigations, sanctioning proceedings or measures conducted or imposed by public or supervisory authorities or professional bodies (i.e. warnings, reprimands, etc.) in any jurisdiction are included in the scope of this question</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>If “Yes” is selected, please provide the following details</p>	
<p>Type of proceedings</p>	<input type="checkbox"/> Criminal <input type="checkbox"/> Administrative <input type="checkbox"/> Civil <input type="checkbox"/> Other
<p>If “Other” is selected, please specify the type of proceedings</p>	<p>Free text</p>
<p>Stage of proceedings</p>	<input type="checkbox"/> Pending <input type="checkbox"/> Concluded <input type="checkbox"/> Under appeal
<p>Provide a brief description of the charge, nature of the alleged wrongdoing (e.g. intentional or owing to negligence, etc.) and of the stage of the proceedings</p>	<p>Free text</p>
<p>Authority in charge of the proceedings and file reference (if available)</p>	<p>Free text</p>
<p>Are the proceedings related to you personally or related to an entity with which you are or have been associated?</p>	<input type="checkbox"/> Yes, they are related to me personally <input type="checkbox"/> Yes, they are related to an entity with which I am or have been associated <input type="checkbox"/> No

¹⁰ Board member includes also the position of member of the board of statutory auditors.

¹¹ Criminal records that have been deleted from the official criminal registry should not be listed.

¹² Relevant civil or administrative proceedings include (but are not limited to) proceedings in the fields of banking, insurance activities, investment services, securities markets, payment instruments, money laundering, pensions, asset management or in any financial regulated sector including any formal notification of investigation or committal for trial, pending disciplinary actions or pending bankruptcy, insolvency or similar procedures, or breach of competition law. In any case, the information on administrative and civil proceeding must include proceedings that are relevant in accordance with the national law implementing the CRD V (Directive (EU) 2019/878 of the European Parliament and of the Council of 20 May 2019 amending Directive 2013/36/EU as regards exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures, OJ L 150, 7.6.2019, p.253).

In the case of alleged wrongdoing, proceedings, investigations or sanctions involving you directly:

i. Specify the circumstances of and reasons for your direct involvement

Free text

ii. Specify what you did to prevent and/or avoid the wrongdoing

Free text

iii. Could you have done more to avoid the alleged wrongdoing and did you learn anything from it?

Free text

In the case of alleged wrongdoing, proceedings, investigations or sanctions involving entities in which you hold or have held functions:

i. Specify the name of the entity involved

Free text

ii. Specify your role in the entity involved and whether you are or were responsible for a division or business line to which the proceedings (including sanctions or measures imposed) relate

Free text

iii. Were you a member of the management body, a key function holder or a senior manager at the time of the alleged wrongdoing?

Free text

iv. In your role in the entity, what did you do to prevent and/or avoid the alleged wrongdoing?

Free text

v. Could you have done more to avoid the alleged wrongdoing and did you learn anything from it?

Free text

Date and/or time frame of the alleged wrongdoing

(YYYY-MM)

Date on which the decision, ruling or finding was made (if applicable)

(YYYY-MM-DD)

Summary of the reasoning of the decision, ruling or finding

Free text

Sanction or penalty received (or likely if convicted in the case of pending proceedings)

Free text

Provide the range (namely the minimum and maximum level) of the sanctions that potentially could be or could have been applied

Free text

Have the proceedings been settled (including through any out-of-court settlement)?

Yes

No

If "Yes" is selected, please provide details (including the parties to the settlement, date, agreed settlement amounts and other relevant information)

Free text

Provide details on your subsequent conduct, including lessons learned and remedial action taken

Free text

Describe any other mitigating or aggravating factors using the Guide to fit and proper assessments¹³ as a basis

Free text

Were there any remuneration clawbacks linked to the above proceedings?

Yes

No

If "Yes" is selected, please provide details

Free text

¹³ By way of example, mitigating factors could include (i) the time elapsed since the alleged wrongdoing, (ii) the absence of further investigations or proceedings, (iii) the absence of dismissal from employment or any position of trust.

B

Are you or have you been personally subject to any disciplinary measures or actions (including disqualification as a member of a management body or discharge from a position of trust)? Yes
 No

If "Yes" is selected, please provide the following details

i. reason for the disciplinary measures or actions

Free text

ii. date or time frame of the alleged wrongdoing

Free text

iii. have you appealed against the disciplinary measures or action?

Free text

iv. if applicable, provide details of the entity involved in the measures or actions

Free text

v. any mitigating or aggravating factors

Free text

C

Are you or have you been subject to any bankruptcy, insolvency or similar procedures? Yes
 No

If "Yes" is selected, please provide the following details

i. length of time since the procedure

Free text

ii. status and (if not ongoing) outcome of the procedure (if final, please indicate whether it was considered intentional or owing to negligence)

Free text

iii. precautionary or attachment measures

Free text

iv. was the procedure triggered by you or by the entity concerned?

Free text

v. if applicable, provide details of the entity involved in the procedure

Free text

vi. details of your personal involvement, particularly if you were declared responsible for the insolvency of the entity

Free text

vii. any mitigating or aggravating factors

Free text

D

Has any financial institution in which you hold or have held any managerial function, or whose management you influence or have influenced materially in any other way, or in which you hold or have held material interests, ever received State aid or ever been subject to a restructuring, recovery or resolution procedure? Yes
 No

If "Yes" is selected, please provide details

Free text

E

To your knowledge, have you personally ever been included in a list of unreliable debtors or do you have a negative record on a list established by a recognised credit bureau or have you been subject to an enforcement measure for a debt on any such list?

- Yes
 No

If "Yes" is selected, please provide details

Free text

F

Have you ever been the subject of a refusal of registration, authorisation, membership or licence to carry out a trade, business or profession, or have you had such a registration, authorisation, membership or licence withdrawn, revoked, suspended or terminated? This question refers also to previous suitability assessments by other competent authorities (including abroad¹⁴)

- Yes
 No

If "Yes" is selected, please provide details

Free text

G

Apart from the cases already mentioned elsewhere in your replies, have you been directly or indirectly involved in a situation that led to concerns or suspicions of money laundering or terrorist financing?

- Yes
 No

If "Yes" is selected, please provide details

Free text

H

Have you personally ever not been fully transparent with the supervisor?

- Yes
 No

If "Yes" is selected, please provide details

Free text

I

To be completed by the supervised entity: If the answer to any question above is "Yes", assess the appointee's reputation taking the relevant facts into consideration and expressly stating the reasons why such facts are not considered to affect his/her suitability.

Free text

¹⁴ The term "abroad" means any territory outside of the scope of competence of the ECB or of the NCA of the supervised entity to which you are being appointed.

5

Conflicts of interest

IMPORTANT: throughout Section 5 “you” means “the appointee personally”, but also their close relatives (spouse, registered partner, cohabitee, child, parent or other relation with whom they share living accommodation) and any legal person in which the appointee is or was a board member or a manager, or a qualifying shareholder, at the relevant time.

A

<p>Do you have any personal relationship with any of the following:</p> <ul style="list-style-type: none">- other members of the management body and/or key function holders of the supervised entity, the parent undertaking or their subsidiaries- qualifying shareholders of the supervised entity, the parent undertaking or their subsidiaries- clients, suppliers or competitors of the supervised entity, the parent undertaking or their subsidiaries	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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If “Yes” is selected, please provide details

Free text

B

<p>Are you currently involved either directly or indirectly in any legal proceedings or out-of-court disputes¹⁵ against the supervised entity, the parent undertaking or their subsidiaries?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
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If “Yes” is selected, please provide the following details

<p>i. The content and current status of the proceedings in question</p> <p>Free text</p>
<p>ii. Which entity (or entities) is(are) involved</p> <p>Free text</p>

¹⁵ These include alternative dispute resolution procedures provided by neutral out-of-court bodies such as conciliators, mediators, arbitrators and out-of-court claims.

C

Do you have any business, professional¹⁶ or commercial relationship or have you had such a relationship in the past two years with any of the following:

- the supervised entity, the parent undertaking or their subsidiaries
- clients, suppliers or competitors of the supervised entity, the parent undertaking or their subsidiaries

Yes No

If "Yes" is selected, please provide the following details

Name of the entity	Main activities of the entity	Type of relationship with the entity	Start date and (if applicable) end date of the relationship
Free text	Free text	Free text	Free text
Value of annual payments (in EUR thousands)	Annual payments made by the payer expressed as a percentage of the payer's (consolidated) gross revenue	Annual payments received by the payee expressed as a percentage of the payee's (consolidated) gross revenue	
Free text	Free text	Free text	

D

Are you subject to any cooling-off period (either under an agreement or under the law)?

Yes
 No

¹⁶ Such as holding a management or senior position(s).

E

Do you have any financial obligations towards the supervised entity, the parent undertaking or their subsidiaries cumulatively exceeding EUR 200,000 (excluding private mortgages¹⁷) or any loans of any value that are not negotiated "at arm's length" or that are non-performing¹⁸ (including mortgages)?

- Yes
 No

If "Yes" is selected, please provide the following details

Name of the debtor (if other than the appointee, indicate the relationship with the appointee)	Name of the entity	Nature of the obligation(s) (e.g. mortgage, personal loan, credit line)	Amount of the obligation(s), specifying the granted and the drawn amount (in EUR millions)	Guarantee (if any) (type and amount)	
Free text	Free text	Free text	Free text	Free text	
Status of the obligation(s) (e.g. performing, non-performing)	Conditions of the obligation(s)	Duration of the obligation(s)	Value of the obligation expressed as a percentage of the total assets of the debtor	Value of the obligation expressed as a percentage of the total loans to the debtor	Value of the obligation expressed as a percentage of the total eligible capital ¹⁹ of the supervised entity
<input type="checkbox"/> Performing; <input type="checkbox"/> Non-performing	<input type="checkbox"/> Market conditions <input type="checkbox"/> Negotiated at arm's length; <input type="checkbox"/> Special conditions <input type="checkbox"/> Supported under the collective bargaining agreements <input type="checkbox"/> Contracts with standardised terms applied together and on a regular basis to a large number of customers <input type="checkbox"/> Other	Free text	Free text	Free text	Free text

¹⁷ Private mortgages of any value do not need to be disclosed (if they are performing, negotiated at arm's length and not contrary to any internal credit approval rules) if they are not of a commercial nature. Moreover, all personal loans (e.g. credit cards, overdraft facilities and car loans) to the appointee from the same entity (if performing, negotiated at arm's length and not contrary to any internal credit rules) do not need to be disclosed as long as they are cumulatively under the threshold of EUR 200,000. Note that such mortgages or loans should be disclosed if they are likely to become non-performing for any reason.

¹⁸ Or subject to forbearance measures.

¹⁹ As defined in Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012, OJ L 176 27.6.2013, p. 1.

F

Do you have any financial interest (such as ownership or investment)²⁰ in any of the following?
 - the supervised entity, the parent undertaking or their subsidiaries
 - clients, suppliers or competitors of the supervised entity, the parent undertaking or their subsidiaries

Yes
 No

If "Yes" is selected, please provide the following details

Name of the entity	Main activities of the entity	Type of relationship between the entity and the supervised entity	Start date of the financial interest	Size of the financial interest (expressed as a percentage of the capital and voting rights of the entity or value of the investment)
Free text	Free text	Free text	Free text	Free text

G

Do you in any way represent a shareholder of the supervised entity, the parent undertaking or their subsidiaries?

Yes
 No

If "Yes" is selected, please provide the following details

i. Name of the shareholder

Free text

ii. Size of the participation (as a percentage of the capital and voting rights)

Free text

iii. Nature of the representation

Free text

H

Do you personally have or have you had in the past two years any position of high political influence (internationally, nationally or locally)?

Yes
 No

If "Yes" is selected, please provide the following details

i. The nature of the position

Free text

ii. The specific role and responsibilities of this position

Free text

iii. The relationship between this position (or the entity where this position is or was held) and the supervised entity, the parent undertaking or their subsidiaries

Free text

²⁰ Current shareholdings of less than 1% or other investments of an equivalent value do not need to be disclosed.

I

Do you have any other relationships, positions or involvement that are not covered in the questions above and could affect the interests of the supervised entity?

- Yes
 No

If "Yes" is selected, please provide the following details

i. Nature and content of the relationship, position or involvement

Free text

ii. Start date of the relationship, position or involvement

Free text

iii. How this relationship, position or involvement may affect your appointment

Free text

J

To be completed by the supervised entity: If the answer to any questions above is "Yes", assess whether the potential conflict of interest is material (if it is not considered material, justify this finding) and indicate how the potential conflict of interest is proposed to be mitigated or managed.

To assess the materiality of the potential conflict of interest, please see Section 3.3 of the Guide to fit and proper assessments and include relevant documentation (e.g. by-laws, rules of procedure, etc.).

Free text

Time commitment

A

Information to be provided by the supervised entity: the supervised entity is required to provide its assessment on how much time is the appointee expected to commit to his/her functions (the time commitment for similar positions within the institution, similar entities in the group or other supervised entities²¹ must be taken into account as a peer comparison)

When providing the above information, the supervised entity must take into account the factors set forth in the joint ESMA and EBA Guidelines on suitability²²

Free text

B

Assessment by the appointee regarding his / her time commitment for the functions²³

Free text

C

Has an additional non-executive directorship been authorised by a competent authority (Article 91(6) CRD)? Yes
 No

If "Yes" is selected, please specify the competent authority

Free text

D

²¹ See the Report on declared time commitment of non-executive directors in the SSM, August 2019, available on <https://www.bankingsupervision.europa.eu>. While this report provides valuable information on the current situation, it does not stipulate requirements or supervisory expectations and its figures do not affect the principle of proportionality or the established case-by-case assessment approach as described in the Guide to fit and proper assessments.

²² See the rules provided in Chapter 4, Title III, of the joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders under Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2017/12).

²³ See the rules provided in Chapter 4, Title III, of the joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders under Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2017/12).

List of executive and non-executive directorships and other professional activities						
	Entity (please state whether the entities are listed)	Country	Description of the entity's activity	Size of the entity ²⁴ (in EUR millions)	Function within the entity ²⁵	
Function for which this questionnaire is being completed	Free text	Free text	Free text	Free text	<input type="checkbox"/> Executive function <input type="checkbox"/> Non-executive function <input type="checkbox"/> Key function holder <input type="checkbox"/> Branch manager <input type="checkbox"/> Other activities	
All other directorships and/or activities ²⁶						
	Privileged counting (Article 91(4) CRD) ²⁷ or no counting ²⁸	Additional responsibilities (such as membership of committees, Chair functions, etc.)	Time commitment per year (in days) ²⁹	Term of mandate (start date and end date)	Number of meetings per year ³⁰	Any additional information or comments
Function for which this questionnaire is being completed	<input type="checkbox"/> Yes, part of a group <input type="checkbox"/> Yes, part of an institutional protection scheme <input type="checkbox"/> Yes, a qualifying holding <input type="checkbox"/> No, nor part of any group, institutional protection scheme or qualifying holding <input type="checkbox"/> No counting	Free text	Number	Free text	Number	Free text
All other directorships and/or activities ³¹						

²⁴ E.g. year-end data on total assets for a financial entity or data on total turnover and international presence for other entities.

²⁵ "Other activities" means lecturing, charity work, pursuing a profession without a corporate position, self-employed activity, etc.

²⁶ For each directorship or other activity a separate row needs to be filled in.

²⁷ Privileged counting applies to directorships held within the same group, in institutions that are part of the same institutional protection scheme and in undertakings in which the institution holds a qualified holding.

²⁸ This applies to directorships in organisations that do not pursue predominantly commercial objectives and positions representing the State.

²⁹ Please include time needed for attendance at meetings of the management body, additional responsibilities such as (but not limited to) membership of committees, training, preparation and follow-up time needed for the meetings, buffer for crises, etc.

³⁰ Meetings of the management body and board committees and any other meetings that the appointee will be involved in owing to the position.

³¹ For each directorship or other activity a separate row needs to be filled in.

E

Total number of executive directorships if privileged counting ³² is applied and if exceptions ³³ are not counted ³⁴	Free text
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F

Total number of non-executive directorships if privileged counting is applied and if exceptions are not counted ³⁵	Free text
---	-----------

G

If privileged counting is applied, please provide details of any synergies that exist between the entities concerned, such that there is a legitimate overlap in terms of the time commitment with respect to those entities Free text

H

Total days per year of time committed to all functions over and above the function for which this questionnaire is being completed ³⁶	Free text
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³² See section 3.4.3.1 of the Guide to fit and proper assessments.

³³ As provided in paragraph 57, Chapter 5, Title III, of the joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders under Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2017/12).

³⁴ In accordance with the rules provided in Chapter 5, Title III, of the joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders under Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2017/12).

³⁵ In accordance with the rules provided in Chapter 5, Title III, of the joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders under Directive 2013/36/EU and Directive 2014/65/EU (EBA/GL/2017/12).

³⁶ Do not include the time commitment for the function in the supervised entity for which this questionnaire is being completed (since this time is already recorded in the first row).

7

Collective suitability

To be completed by the supervised entity if the appointee is being appointed as a member of the management body.

A	
Is the supervised entity subject to national requirements ³⁷ on gender diversity?	<input type="checkbox"/> Yes <input type="checkbox"/> No
If "Yes" is selected, in making this appointment, is the supervised entity compliant with the national requirements on gender diversity?	<input type="checkbox"/> Yes <input type="checkbox"/> No

B	
In making this appointment, is the supervised entity compliant with its internal target for gender diversity in the composition of the management body?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No internal target exists

C	
In making this appointment, is the supervised entity compliant with its internal target for other aspects of diversity?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No internal targets exist

D	
Describe the extent to which the appointee contributes to the collective suitability of the management body, including its understanding of climate-related and environmental risks. In addition, explain in general terms the weaknesses that have been identified in the management body's collective composition and the extent to which the appointee contributes to solving some or all of these weaknesses	
Free text	

³⁷ [If applicable] According to Article XX of [national law].

E

List of members of the management body (as applicable)

First name, last name	Function(s)	Date of appointment or renewal	Professional training	Skills and main areas of expertise
Free text	<input type="checkbox"/> Member of the management body in its management function <input type="checkbox"/> Chair of the management body in its management function <input type="checkbox"/> Deputy Chair of the management body in its management function <input type="checkbox"/> Chief Executive Officer (CEO) <input type="checkbox"/> Deputy Chief Executive Officer (CEO) <input type="checkbox"/> Chief Financial Officer (CFO) <input type="checkbox"/> Chief Risk Officer (CRO) <input type="checkbox"/> Member of the management body in its supervisory function <input type="checkbox"/> Chair of the management body in its supervisory function <input type="checkbox"/> Deputy Chair of the management body in its supervisory function <input type="checkbox"/> Manager of a foreign branch <input type="checkbox"/> Head of the compliance function <input type="checkbox"/> Head of the internal audit function <input type="checkbox"/> Head of the risk management function	(YYYY-MM-DD)	Free text	<input type="checkbox"/> banking and financial markets <input type="checkbox"/> legal requirements and regulatory framework, including in the field of prevention of money laundering and terrorist financing <input type="checkbox"/> strategic planning, the understanding of a credit institution's business strategy or business plan and accomplishment thereof <input type="checkbox"/> risk management (identifying, assessing, monitoring, controlling and mitigating the main types of risk of a credit institution) <input type="checkbox"/> climate-related and environmental risks <input type="checkbox"/> accounting and auditing <input type="checkbox"/> assessing the effectiveness of a credit institution's arrangements, ensuring effective governance, oversight and controls <input type="checkbox"/> interpreting a credit institution's financial information, identifying key issues based on this information and appropriate controls and measures <input type="checkbox"/> insurance <input type="checkbox"/> IT <input type="checkbox"/> human resources <input type="checkbox"/> other

Additional information and annexes

A

If there is any other information that the appointee or supervised entity considers to be relevant to the assessment, it must be included here

Free text

B

Please upload (if applicable) the following accompanying documents

- Criminal record check
- (Draft) Board minutes regarding the appointment
- (Draft) minutes of the Nomination Committee (if any) regarding the appointment and/or other records of suitability assessments conducted within the supervised entity
- Copy of identity card/passport
- Suitability reports (both individual and collective in the case of tasks performed in a collegiate body)
- CV
- Other documents (in accordance with national specificities)

9 Privacy statement for fit and proper

The privacy statement³⁸ sets out the legal basis and details for the processing of personal data by the ECB. The ECB is required to process personal data in respect of any application in order to assess the suitability of the appointee for the position.

With the submission of the completed questionnaire you acknowledge that you have read and understand the privacy statement.

³⁸ The privacy statement is available online at: https://www.bankingsupervision.europa.eu/home/data-protection/privacy-statements/html/ssm.privacy_statement_prudential_supervision.en.html