

30. CSSDA

From: SADET Romain
Sent: 18 July 2012 12:38
To: LUZ Vera
Subject: FW: EBA Consultation Paper on draft Guidelines for assessing the suitability of members of the management body and key function holders of a credit institution (EBA/CP/2013/03)

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From: Efi Argyridou [mailto:eargyridou@cssda.gov.cy]
Sent: 18 July 2012 12:11
To: EBA-CP03
Cc: ?????????????? ???????
Subject: EBA Consultation Paper on draft Guidelines for assessing the suitability of members of the management body and key function holders of a credit institution (EBA/CP/2013/03)

Dear Sir/Madam

Regarding the above draft guidelines please find below the comments of the Authority for the Supervision and Development of Cooperative Societies (Cyprus).

Article 14: Experience Criteria

Our position regarding article 14 of the consultation paper is that competent authorities when assessing experience should:

- (a) have the flexibility to approve or reject a candidate based on his/her either theoretical or managerial experience and not necessarily both of them, and
- (b) as regards managerial experience, have the ability to evaluate and accept any experience received during the exercise of any duties focused in finance, accounting, business administration, law or other relevant areas.

The competent authorities should exercise the above discretions taking into consideration:

- (i) the proportionality principal,
- (ii) the theoretical and managerial experience of the whole management body.

The above suggestions are considered very important as regards small local cooperative or similar institutions to which the current text of the consultation paper may cause practical burdens.

We remain at your disposal for any further requests/information.

Kind Regards

Efi Argyridou

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