

EBA/CP/2026/02

25 February 2026

Consultation Paper

Draft Regulatory Technical Standards to specify the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment referred to in Article 91(1f) and in Article 91a(5) for the entities listed in Article 91(1d) of Directive 2013/36/EU

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1. Responding to this consultation

The EBA invites comments on all proposals put forward in this paper and in particular on the specific questions summarised in 5.2.

Comments are most helpful if they:

- respond to the question stated;
- indicate the specific point to which a comment relates;
- contain a clear rationale;
- provide evidence to support the views expressed/ rationale proposed; and
- describe any alternative regulatory choices the EBA should consider.

Submission of responses

To submit your comments, click on the 'send your comments' button on the consultation page by 26 May 2026. Please note that comments submitted after this deadline, or submitted via other means may not be processed.

Publication of responses

Please clearly indicate in the consultation form if you wish your comments to be disclosed or to be treated as confidential. A confidential response may be requested from us in accordance with the EBA's rules on public access to documents. We may consult you if we receive such a request. Any decision we make not to disclose the response is reviewable by the EBA's Board of Appeal and the European Ombudsman.

Data protection

The protection of individuals with regard to the processing of personal data by the EBA is based on Regulation (EU) 1725/2018 of the European Parliament and of the Council of 23 October 2018. Further information on data protection can be found under the Legal notice section of the EBA website.

2. Executive Summary

Pursuant to Article 91(10) of Directive 2013/36/EU (CRD), the EBA is required to develop regulatory technical standards (RTS) dealing with the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment for the entities listed in Article 91(1d) of CRD (“entities”).

In order to foster supervisory convergence, this draft RTS specify further the content of the documents to be provided by the entities to competent authorities such as the information to be included in the internal suitability assessment for the members of the management body, the heads of internal controls and the chief financial officer (all referred to “key function holders” or “KFH”), the information for the assessment of individual and collective knowledge, skills and experience; the information for the assessment of reputation, honesty and integrity and the independence of mind, the information for the assessment of time commitment and the entity’s conclusion with regards to individual and collective suitability.

The information to be provided will enable the competent authorities to assess the good repute, knowledge, skills and experience (“suitability”) and the independence of mind of the members of the management body and the suitability of KFH.

The draft RTS do not prejudice a competent authority’s right to request clarifications or additional information or documentation than those required in accordance with this Regulation.

Next steps

The EBA will finalise the draft RTS following its public consultation and aims to submit it in [XXX] 2025 to the European Commission for adoption.

3. Background and rationale

1. To further ensure a level playing field and foster supervisory convergence, Directive 2013/36/EU foresees the harmonisation of the information for the assessment of suitability of members of the management body, the heads of internal controls and the chief financial officer, notably the suitability questionnaire, curriculum vitae and internal suitability assessment, to be submitted to the competent authorities for performing the suitability assessment for the entities listed in Article 91(1d) of Directive 2013/36/EU.
2. Therefore, pursuant to Article 91(10) of Directive 2013/36/EU, the EBA shall draft regulatory technical standards (RTS) further specifying the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment referred to in Article 91(1f) and in Article 91a(5) of Directive 2013/36/EU, for the entities listed in Article 91(1d) of Directive 2013/36/EU.
3. The aim of assessing the suitability of members of management bodies, the heads of internal controls and the chief financial officer is to ensure that those members are qualified for their role and are of good repute. Having a robust “fit-and-proper” framework for assessing the suitability of members of the management body and heads of internal controls and the chief financial officer is a crucial factor to ensure that institutions are adequately run and their risks appropriately managed.
4. Having the primary responsibility for assessing the suitability of each member of the management body, the management body collectively, the heads of internal controls and the chief financial officer, entities should carry out the initial suitability assessment before a new member takes up the position followed by a verification by the competent authorities.
5. The assessment of suitability of members of the management body and the heads of internal controls and the chief financial officer of the entities listed in Article 91(1d) of Directive 2013/36/EU needs to be demonstrated and documented. The draft RTS seek to further specify the information to be provided regarding the internal suitability assessment of the individual and collective knowledge, skills and experience; reputation, honesty and integrity of those persons and the independence of mind, number of directorships and ability to commit sufficient time to fulfil their duties of members of the management body, including the entity’s conclusion regarding their individual or collective suitability.
6. Information and documents that are necessary for the suitability assessment by the competent authorities should be transferred to the competent authorities by the means determined by the competent authority.
7. Competent authorities should be permitted to request specific clarifications or additional information or documentation regarding the suitability of members of the management body and of heads of internal control functions and the chief financial officer of large entities than those required in accordance with this Regulation. Where specific information is already available to

competent authorities and is up to date and relevant for the assessment, competent authorities should be permitted not to ask for its resubmission by the entities.

Next Steps

8. EBA will finalise the draft RTS following its public consultation and submit them to the European Commission for adoption.

4. Draft regulatory technical standards

COMMISSION DELEGATED REGULATION (EU) .../...

of XXX

supplementing Directive 2013/36/EU of the European Parliament and of the Council with regard to the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment referred to in Article 91(1f) and in Article 91a(5) of Directive 2013/36/EU for the entities listed in Article 91(1d) of Directive 2013/36/EU

(Text with EEA relevance)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to 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 as amended by Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024, and in particular Article 91(10) thereof,

Whereas:

- (1) The filled in suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities by entities listed in Article 91(1d) of Directive 2013/36/EU (large entities) should enable the competent authorities to assess the suitability of members of the management body, heads of internal control function and the chief financial officer as referred to in Articles 91 and 91a of Directive 2013/36/EU in order to ensure the sound and prudent management and robust governance of large entities.

- (2) The suitability assessment as referred to in Article 91(1a) and Article 91a(2) of Directive 2013/36/EU by large entities should include a description of up to date information on the assessment of the member of the management body and the heads of internal control functions and the chief financial officer's knowledge, skills and experience. It should also include information on those persons knowledge, skills and experience, reputation, honesty and integrity and the independence of mind, time commitment and collective knowledge of members of the management body. The large entity's conclusion on the assessment with regards to individual and collective suitability should also be part of the documentation to be submitted to competent authorities to allow for a more efficient assessment process.
- (3) The suitability questionnaire and the curriculum vitae as referred to in paragraph 1e of Article 91 of Directive 2013/36/EU should include a minimum set of information that are allowing the competent authorities to assess the suitability of member of the management body individually and collectively and the suitability of heads of internal control and the chief financial officer of large entities. Where specific information is already available to competent authorities and is up to date and relevant for the assessment, competent authorities should be permitted not to ask for its resubmission by the entities.
- (4) The information required to be submitted pursuant to this Regulation should enable the assessment of the suitability of the members of management body, heads of internal control and the chief financial officer of large entities by competent authorities.
- (5) It is important that the information submitted for the purposes of the assessment of suitability is true, accurate, complete and up to date from the moment of the submission, updates of those information need to be provided over time to ensure that the suitability can be assessed on an ongoing basis.
- (6) This Regulation specifies further the list of information and documentation to be submitted to competent authorities for the purpose of the assessment of suitability and does not provide further specification on the criteria for assessing such information and documentation within the context of the suitability assessment.
- (7) This Regulation is based on the draft regulatory technical standards submitted to the Commission by the European Banking Authority and the European Securities and Markets Authority.
- (8) The European Banking Authority has conducted together with the European Securities and Markets Authority an open public consultation on the draft regulatory technical standards on which this Regulation is based, analysed the potential related costs and benefits and requested the advice of the Stakeholder Groups established in accordance with Article 37 of Regulation (EU) No 1093/2010 of the European Parliament and of the Council¹.

HAS ADOPTED THIS REGULATION:

¹ Regulation (EU) No 1093/2010 of the European Parliament and of the Council.

Article 1

Definitions

For the purposes of this Regulation, the following definitions shall apply:

- a) Member means a proposed or appointed member of the management body.
- b) Suitability questionnaire as referred to in Article 91(1e)(a) of Directive 2013/36/EU means a document developed by competent authority and publicly available referring to the information that the competent authority expects to receive in order to assess individual's suitability as referred to in Articles 91 and 91a of Directive 2013/36/EU.

Article 2

Information to be included in the internal suitability assessment of the members of the management body performed by entities

The entities listed in Article 91(1d) of Directive 2013/36/EU shall submit to the competent authority the internal suitability assessment as referred to in Article 91(1a) of Directive 2013/36/ EU that includes, at least the following up to date information:

- (a) an assessment of the individual's knowledge, skills and experience, as specified under Article 4;
- (b) an assessment of the individual's reputation, honesty and integrity as specified under Article 5;
- (c) an assessment of the individual's independence of mind, as specified under Article 6;
- (d) an assessment of the individual's time commitment conducted as specified under Article 7 including information on the number of directorships held in accordance with Article 91(3) of Directive 2013/36/EU;
- (e) an assessment of the collective suitability of the management body as specified under Article 8;
- (f) the entity's conclusion as specified under Article 9 with regard to:
 - i. the individual's suitability and
 - ii. the collective suitability.

Article 3

Information to be included in the internal suitability assessment of key function holders performed by entities

For the heads of internal controls and the chief financial officer, the entities listed in Article 91a(5) of Directive 2013/36/EU shall submit to the competent authority, the internal suitability assessment as referred to in Article 91a(2) of Directive 2013/36/ EU that includes the information referred to in point Article 2 (a) and (b) and the entity's conclusion with regard to the individual's suitability under Article 2(f)(i).

Article 4

Assessment of knowledge, skills and experience

- (1) The assessment of the individual's knowledge, skills and experience shall ascertain if the individual has the appropriate experience for the position sought, including whether the individual's education and professional experience are relevant and sufficient.
- (2) Where non-material weaknesses are identified by the entity regarding the suitability of an individual, the assessment shall be accompanied by any mitigating measures decided on to address these weaknesses, including where applicable, the content, timeline and duration of a training plan to ensure that the individual meets fully the suitability criteria, within a maximum time period of six months, after their appointment.
- (3) The assessment of the individual's knowledge, skills and experience shall consider at least:
 - (a) the role, responsibilities and duties of the position and the required capabilities;
 - (b) the individual's education, knowledge and professional experience, including the nature of all organisations for which the individual has worked; and
 - (c) the nature and duration of the functions performed as resulting from the individual's curriculum vitae and other relevant documentation.

Article 5

Assessment of reputation, honesty and integrity

- (1) Without prejudice to the presumption of innocence applicable to criminal proceedings and other fundamental rights, the assessment of the individual's reputation, honesty and integrity shall ascertain if the individual is deemed to be of good repute, is honest and has the integrity to ensure the sound and prudent management of the entity and that there are no objective and demonstrable grounds to suggest otherwise.
- (2) When considering any relevant criminal or administrative records or proceedings, the individual assessment shall take into account the type of conviction or indictment, the role of the individual involved, the penalty received, the phase of the judicial process reached and any rehabilitation measures that have taken effect. The surrounding circumstances, including mitigating factors, the seriousness of any relevant offence or administrative or supervisory action, the time elapsed since the offence, the individual's conduct since the offence or action, and the relevance of the offence or action and its impact to the individual's role shall be considered. The assessment shall also consider the impact of the cumulative effects of minor incidents on the individual's reputation.

(3) The assessment shall be based at least on the following information:

- (a) Criminal records, considering periods of limitation in force in the national law, including, where available, from countries where the individual is a citizen, is resident or works, or has been a citizen or been resident or has worked within the last 10 years, or other equivalent document according to national law, and where possible and relevant, information on criminal investigations and proceedings;
- (b) relevant civil, administrative and disciplinary decisions, including bankruptcy, insolvency and similar procedures, especially through an official certificate or any reliable source of information concerning the absence of criminal conviction, investigations and proceedings;
- (c) statement of whether or not criminal proceedings are pending or whether or not the person or any organisation managed by them has been involved as a debtor in insolvency proceedings or a comparable proceeding;
- (d) investigations, enforcement proceedings, or sanctions by a supervisory authority in which the individual has been directly or indirectly involved;
- (e) refusal of registration, authorisation, membership or a licence to carry out a trade, business or profession; or the withdrawal, revocation or termination of registration, authorisation, membership or a licence; or expulsion by a regulatory or government body or by a professional body or association;
- (f) dismissal from employment or a position of trust, fiduciary relationship, or similar situation, excluding redundancies;
- (g) information regarding the applicant's financial soundness, which may potentially compromise their good repute, honesty and integrity;
- (h) any other reliable internal or external resources available to the entity about the individual's past performance that are relevant when assessing the individual's reputation, honesty and integrity.

Article 6 –

Assessment of independence of mind

(1) The assessment of the individual member's independence of mind shall cover, at least, information on the following:

- (a) any evidence that suggest that the individual has the necessary behavioural skills, including:
 - 1. the ability to present their views, discuss strategies and business objectives to effectively, critically and independently assess and challenge the proposed decisions of other members of the management body; and
 - ii. being able to ask questions to the other members of the management body.

- (b) Any conflicts of interest to an extent that it would impede the individual's ability to perform their responsibilities and duties independently and objectively. The information on conflict of interests shall set out all actual and potential conflicts of interest in accordance with the entity's conflicts of interest policy and assess their materiality.
- (2) If a material conflict of interest is identified, the entity shall describe how this conflict has been satisfactorily mitigated or remedied including a reference to the relevant parts of the entity's conflict of interest policy or any bespoke conflict management or mitigation arrangements.

Article 7 –

Assessment of time commitment

The assessment of time commitment and individual member's ability to dedicate sufficient time to the function shall be conducted with a reference to the applicable internal policy of the entity and shall cover at least the following:

- (a) the minimum time that shall be devoted to the performance of the individual member's functions within the entity with annual estimates;
- (b) a list of all mandates as executive or non-executive director that the individual holds and, where the privileged counting rules under Article 91(4) of Directive 2013/36/EU apply;
- (c) the size of the companies or organisations where those mandates are held including for example, total assets, whether or not the company is listed, and number of employees;
- (d) any additional responsibilities associated with those mandates such as the chair of a committee;
- (e) number of meetings per year dedicated to each mandate; and
- (f) the time commitment for each mandate and any other relevant activities where the member is obliged to commit time.

Article 8 –

Assessment of collective suitability of the management body

- (1) The assessment of collective knowledge, skills and experience of the management body as a whole shall ascertain how the individual is to be situated in the overall composition and suitability of the management body. The assessment shall include a description of how the overall composition of the management body reflects an adequately broad range of skills and experience and the identification of any gaps or weaknesses and the measures imposed to address these.
- (2) The entity shall provide a list of the names of the members of the management body and their respective roles and duties taking into account the individual statement of members as referred to in Article 88(3) of Directive 2013/36/EU.

- (3) If a gap in knowledge, skills and experience is identified, the entity shall provide information on how this gap will be mitigated or remedied, including the timeline by which this will be achieved.

Article 9 –

Entity’s conclusion with regards to individual and collective suitability

- (1) The internal suitability assessment conducted by the entity shall include the entity’s conclusion and reasoning that the individual is suitable, including, where applicable the conditions imposed under Article 8 of this Regulation for the function taking into account its role and duties and the conclusion on individual’s contribution to the collective suitability of the management body.
- (2) In accordance with the entity’s primarily responsibility to perform the internal suitability assessment, the entity’s assessment conclusion shall clearly state that the individual is suitable to perform the function.

Article 10 –

Information to be included in the suitability questionnaire

- (1) The individual and the entity shall be jointly responsible for providing the competent authority with complete and accurate information regarding the proposed appointment. In this regard, the individual and the entity have the responsibility to disclose to the competent authority all matters that may be relevant to the assessment.
- (2) The suitability questionnaire shall provide for, at least, the following information and details on:
 - (a) the name of the entity, including the contact person within the entity who is responsible for filling-in and submitting to the competent authority the suitability questionnaire;
 - (b) the identity of the individual for whom the suitability questionnaire is filled-in and submitted, including their name, gender where available, their date of birth, place of birth, country of birth, current residence and where relevant countries where the individual has lived over the past 10 years in accordance with Article 5(3)(a);
 - (c) previous concluded and ongoing supervisory suitability assessments, including from the competent authority and entity involved;
 - (d) the role for which the suitability questionnaire is submitted, including a detailed description of the responsibilities and reporting lines of the role, and any other roles the individual is or will be exercising within the entity;
 - (e) the planned start date and length of the term of office, if applicable;

- (f) any professional practical experience related to banking or financial sector gained in the last 10 years and other relevant experience outside of banking or financial sector, academic qualifications, and any relevant training as referred to in Article 4(2);
- (g) an assessment of the individual's level of banking experience, including any induction or other trainings to be undertaken within a maximum period of 6 months from their appointment together with content, timeline and duration;
- (h) the individual's reputation, honesty and integrity based on the information referred to in Article 5(3), including all corporate entities, partnerships or unincorporated entities with which the appointee is or has been associated as a member of the management body, key function holder, senior manager, owner, partner, associate, or qualifying shareholder. The information shall be provided only for alleged wrongdoing which happened in the period in which the individual was associated with the entity;
- (i) any of the individual's personal, business or professional relations with:
 - i. other members of the management body and/or key function holders of the institution, the parent undertaking or their subsidiaries;
 - ii. qualifying shareholders of the entity, the parent undertaking or their subsidiaries;
 - iii. suppliers or competitors of the entity, the parent undertaking or the entity's subsidiaries.
- (j) any personal, business or professional relations provided under letter (i) related to individual's close relatives and any legal person in which the individual is or was a member of the management body, or a qualifying shareholder, at the relevant time;
- (k) any financial obligations towards the entity, the parent undertaking or their subsidiaries the individual or his close relatives or any legal person in which the individual is or was a member of the management body, or a qualifying shareholder, at the relevant time, have, including any loans of any value that are not negotiated under market's conditions or are non-performing;
- (l) the individual's 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
- (m) all of the individual's other directorships and other mandatory activities such as lecturing, pursuing a profession different from a directorship, including time needed for each of those;
- (n) a list of the names of the members of the management body and their respective roles and duties in brief, including the areas of their main knowledge, skills and experience that allow them to contribute to the collective suitability of the management body as referred to in Article 8(1);
- (o) any weaknesses that have been identified in the management body's collective composition and the extent to which the individual contributes to solving some or all of these weaknesses;
- (p) the extent to which the individual contributes to the collective suitability of the management body.

- (3) The suitability questionnaire shall be accompanied by statements, signed either on paper or on another durable medium, in accordance with EU or national legislation, by the individual and the entity confirming, at least, that:
- (a) the information provided to competent authority is accurate and complete to the best of their knowledge;
 - (b) the individual and the entity shall notify the competent authority immediately if there is a material change in the information provided.

Article 11 –

Information to be included in curriculum vitae

- (1) The curriculum vitae as referred to in Article 91(1e) of Directive 2013/36/EU shall be accurate and complete and cover at least the following:
- (a) surname, first name(s) and birth name, if applicable;
 - (b) date of birth, place of birth, residence and nationality;
 - (c) details of education, including academic qualifications and other relevant trainings;
 - (d) professional experience: name and nature of all organisations for which the individual has worked, and the nature and duration of the functions performed, in particular highlighting any activities within the scope of the position sought such as banking and/or management experience.
- (2) The entity is not required to submit the curriculum vitae of the individual to competent authority, if the information described therein is already provided by the relevant sections of the suitability questionnaire as referred to in Article 10.

Article 12

Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the Official Journal of the European Union. This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the Commission
The President

Question: Are the draft RTS appropriate and sufficiently clear?

5. Accompanying documents

5.1 Draft cost-benefit analysis / impact assessment

As per Article 10(1) of Regulation (EU) No 1093/2010 (EBA Regulation), regulatory technical standards shall be accompanied by an Impact Assessment (IA) which analyses 'the potential related costs and benefits.' This section presents the IA of the main policy options included in this draft Consultation Paper on regulatory technical standards (RTS) to specify the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment referred to in Article 91(1f) and in Article 91a(5) for the entities listed in 1dof Article 91(1d) of Directive 2013/36/EU.

A. Problem identification

The information for the assessment of suitability of members of the management body, the heads of internal controls and the chief financial officer, notably the suitability questionnaire, curriculum vitae and internal suitability assessment, to be submitted to the competent authorities for performing the suitability assessment for the entities listed in Article 91(1d) of Directive 2013/36/EU should contain the appropriate level of details to enable the competent authority to carry out the suitability assessment. Lack of a standardised level of information for such suitability assessment may lead to diverging approaches and different practices across Member States with respect to the information to be assessed for the suitability assessment, hindering the level playing field and leading to regulatory arbitrage across EU Member States. Against this background, the Directive 2013/36/EU as amended by Directive (EU) 2024/1619 mandates the EBA to draft regulatory technical standards (RTS) further specifying the minimum content of the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment referred to in Article 91(1f) and in Article 91a(5) of Directive 2013/36/EU, for the entities listed in Article 91(1d) of Directive 2013/36/EU.

B. Policy objectives

The strategic objective of the RTS is the harmonisation of requirements relating to the submission of information with regard to the suitability questionnaire, curriculum vitae and internal suitability assessment to be submitted to the competent authorities for performing the suitability assessment of members of the management body and the heads of internal controls and the chief financial office of large institutions as defined under Directive 2013/36/EU. The operational objective of the RTS to further specify the detailed list of information to be provided to the competent authorities for the suitability assessment.

The consultation with policy experts from EU Member States showed that the establishment of a framework for the provision of harmonised content of the information to be provided for the purpose of the suitability assessment of members of the management body and the heads of

internal controls and the chief financial officer of large institutions is not expected to generate a substantial impact on the costs and benefits.

C. Baseline scenario

The current landscape in the provision of information for the suitability assessment of members of the management body and the heads of internal controls and the chief financial officer of large institution to be submitted is not fully harmonised across the EU. However, the set of information depicted in the draft RTS draws substantially from the existing practices of competent authorities and in particular the ECB-SSM. It is therefore not expected that there will be any significant change in the information requirements that would generate significant additional costs. At the same time the benefits from the implementation would exceed these costs of the operational changes.

D. Options considered

The main policy options relating to the mandate in Article 91(10) of Directive 2013/36/EU are the following:

Policy option 1: specifying a completely new content of information to be submitted to the CAs, based on existing diverse practices across the EU related to the requirements for the suitability assessment of members of the management body, the heads of internal controls and the chief financial officer of credit institutions. This option is in line with the requirements of CRD VI, which contemplates a harmonised set of information, and with the objective of the single rulebook. However, this option would not ensure a full continuity with existing practices already harmonised for supervisory purpose, in particular regarding significant institutions within SSM-ECB countries. It would also create additional costs for institutions.

Policy option 2: the 'flexible maximum harmonisation' option, i.e. setting out the content of information based on existing practices, subject to a certain flexibility to vary the requirements. Pursuant to this approach, which was embraced by the RTS, the required content of information is harmonised based on existing practices but could vary either by requesting additional information or by dispensing with the requirement to provide certain information, subject to specified conditions (which are also set out in the RTS). This option would draw the optimal line between the sufficient harmonisation requirement, while at the same time ensuring the necessary flexibility for CAs. This solution implies also lower implementation costs.

E. Cost-Benefit Analysis

This section evaluates in quantitative terms the cost and benefits of the individual policy options, in relation to the current level of operational cost of credit institutions and competent authorities. The estimations set out in this section are substantially based on the deliberations among the

competent authorities but not on any stock-taking exercise. Thus, the evaluation could contain a certain level of subjectivity.

Policy option 1: the one-off costs from the implementation of this solution would be high as a new set of content of information would need to be implemented, and the on-going costs after the implementation would be negligible.

Policy option 2: the one-off and on-going costs from the implementation of this option would be negligible. The operational benefits from continuity and harmonisation would be positive.

F. F. Preferred option

The preferred policy option for the content of the information relating to the mandate in Article 91(10) of CRD VI is policy option 2.

5.2 Overview of questions for consultation

Question 1: Are the draft RTS appropriate and sufficiently clear?