**Suitability matrix for policy makers (persons in charge of day-to-day policy)**

In addition to being trustworthy, persons in charge of day-to-day policy of market operators, central securities depository and providers of investment objects must also be suitable to adequately fulfil their positions. Market operators, central securities depository and providers of investment objects make their own pre-selection in this regard.

The applicant must indicate in the suitability matrix why the persons in charge of day-to-day policy are suitable. The AFM will take this into consideration in the assessment based on the Suitability Policy Rule 2012 and the Financial Supervision Act (Wft).

The substantiation of knowledge and experience, and the choice with regard to the composition of the collective, are very important for the AFM in order to carry out the assessment. Therefore, in addition to an assessment of a person's knowledge and experience, an explanation is requested in the matrix. Simply stating that 'the person in question has 20 years of work experience' is insufficient substantiation, as the type of work experience and the daily policy maker's role are not made sufficiently clear. The substantiation must be provided with proper examples.

Furthermore, an explanation is requested as to why the collective as a whole satisfies the requirements. How do the policy makers work together, what are their individual strengths and how do they complement each other? How does the collective function as a whole? Finally, the AFM would like to obtain insight into how the responsibilities are divided within the executive board. An executive board has a joint responsibility.

**Matrix division of focus areas of the Executive Board***The aim of this section is to obtain insight into how the focus areas are divided within the collective. Please fill in the focus areas for each person below. A focus area implies that the person holds the final responsibility for this area within the collective. If multiple persons hold the final responsibility for a specific area, please indicate this. If the activity does not take place within the organisation, you can fill in N.A. If the activity has been outsourced, you must specify which person has the final responsibility for this within the collective.*

*Please add rows and topics if applicable.[[1]](#footnote-1)*

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Executive Board** | **[name person 1]** | **[name person 2]** | **[name person 3]** | **[name person 4]** | **[name person 5]** |
| Name |  |  |  |  |  |
| Chair |  |  |  |  |  |
| Financial administration |  |  |  |  |  |
| Administrative organization and internal control |  |  |  |  |  |
| Internal Audit |  |  |  |  |  |
| Compliance |  |  |  |  |  |
| Risk management |  |  |  |  |  |
| Facility management |  |  |  |  |  |
| IT |  |  |  |  |  |
| Other matters (specify) |  |  |  |  |  |

**Considerations regarding the composition of the collective***Explain here why you have opted for this composition of the collective. How is the cooperation, which roles and which characteristics do the various persons have which makes the composition a good collective? Have certain persons been chosen based on the assumption that they would provide a specific added value for the collective (for example, knowledge that is necessary for the specific activities or for IT). If this is the case, whom does this concern and what is the added value?*

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**Matrix knowledge and experience policy maker***Please explain below whether the prospective daily policy maker's knowledge and work experience in this area is at a low, medium or high level. It is not plausible that a "high" score is obtained in all areas. "High" is also not necessary in order to be approved by the AFM. However, there has to be sufficient knowledge present, both individually and in the collective. Please fill out pages 4 through 12.*

*Low: Has no knowledge or experience in this area, or limited knowledge and experience.   
Medium: has good insight into the subject area (but is not an expert in this field).   
High: has very extensive knowledge and work experience in this field and is regarded by others as an expert.*

|  |  |
| --- | --- |
| **A. Stakeholders, governance, organization & culture** |  |
| Has held the responsibility for the hierarchical leadership of an organisation |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has held the responsibility for the hierarchical leadership of a department |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has experience with the functional leadership of a team |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has held a senior position within a department, which included responsibilities that exceeded the department level. |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has experience with compliance with and enforcement of codes and internal regulations, such as laid down in the corporate governance codes and codes of conduct, and applicable laws and regulations |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has experience with the supervision of and monitoring of outsourced activities |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Knows when and how stakeholders (including supervisors, shareholders, clients and external auditor) should be informed |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Other relevant knowledge and specific areas of experience in this area: To be filled in, if and to the extent present |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |

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| **B. Products, services and markets within the institutions scope of activities** |  |
| Has general knowledge of and experience with the market in which the undertaking is active and the relevant developments on this market |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with the financial aspects of products and/or services of the undertaking |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with the development of comparable products and/or services |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has insight into the internal expertise of the undertaking (within the management body and internal audit) in the area of appropriateness of comparable products and/or services |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with relevant laws and regulations including  the Financial Supervision Act (Wft), the Decree on Prudential Rules for Financial Undertakings (Bpr) and the Decree on the Supervision of the Conduct of Financial Undertakings (BGfo) as well as the relevant supervision regulations and  policy rules |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with the assessment of products, services and markets in which the undertaking is active, in order to be able to identify the long-term interests of the undertaking and act accordingly |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Other relevant knowledge and specific areas of experience in this area:  To be filled in, if and to the extent present |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |

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| **C. Business operations** |  |
| Has knowledge of and experience with organising and/or assessing the administrative organisation and internal control (AO and IC). |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with administrative procedures and processes in the financial or product-related field |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with holding responsibility for the compliance function |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with (responsibility for) the (external) IAD and/or control |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Is able to assess the remuneration policy and to implement it for managing directors |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with putting the customers' interests first in the provision of services |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with the identification of the undertaking's most relevant risks |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with policy regarding delegation |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with assessing whether the treatment of clients with due care is ensured |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Other relevant knowledge and specific areas of experience in this area:  To be filled in, if and to the extent present |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |

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| **D. Balanced and consistent decision-making** |  |
| Has knowledge of and experience with (the organization of) the decision-making process |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with evaluating (internal) reports to properly fulfil his or her task and knows when missing information must be requested |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Knows how in a decision-making process the interests of all stakeholders are weighed and has experience with this. |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Has knowledge of and experience with recognizing and raising the issue of conflicts of interests in the decision-making process. |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Can assess whether decisions have been made in line with the corporate strategy |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Makes decision-making transparent and ensures careful recording |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Makes clear choices and explains his or her considerations properly |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Acts in line with the objectives and previous choices, but can deviate motivated from decisions taken under (changed) circumstances |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Other relevant knowledge and specific areas of experience in this area:  To be filled in, if and to the extent present |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |
| Acts with independence of mind by providing constructive and robust  challenge of proposals and decisions |  |
| Explanation: Where and when was the knowledge and experience gained, what did this involve? |  |

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| **E. Time commitment** |  |
| What time commitment is required for the function involved (hours per week and days per year)? |  |
| Total hours per week of time committed to all directorships outside the function for which submission is made: |  |
| Total days per year of time committed to all directorships outside the function for which submission is made: |  |

**Time commitment overview**

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **List of executive and non-executive directorships and other professional activities. Please list the directorship for which this form is being completed first and then all other directorships and other professional activities held by the appointee.** | | | | | | | | | |
| Entity  (please  mark listed  companies  with\*) | Country | Description  of the  company’s  activity | Size of entity | Function  within the  entity:  executive  director/ nonexecutive  director/other | f. Privileged  counting (Article  91(4) CRD IV or article 45(2a) MiFID II) or no counting | g. Additional  responsibilities such as  membership of  committees,  chair functions, etc. | h. Time  commitment per week  (hours) and per year  (days) (to include  Additional responsibilities) | i. Term of  mandate  (as of –  until) | k. Number of  board  meetings per  year |
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1. This list is not cumulative, nor exhaustive [↑](#footnote-ref-1)