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Information meeting on fit and proper assessments

November 5th, 2026

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Why does DNB conduct assessments?

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Why do we conduct assessments

- Having fit and proper directors and supervisory directors in charge of a financial institution is essential for:
  - An institution's strategy and corporate culture
  - Its soundness and future viability
  - The reputation of the financial sector

- High-quality management and internal supervision contribute to:
  - The stability and integrity of the financial sector
  - Public trust in financial institutions

- An appointee's fitness and propriety are primarily the institution's responsibility
  - Prior to the appointment (and the assessment application)

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Who does DNB assess?

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Who does DNB assess

- Prior to their appointment, DNB assesses the fitness and propriety of various individuals at financial institutions subject to our supervision whose assessment is required by law
- Examples are:
  - Board members, Co-policymakers, supervisory board or supervisory committee
  - Holders of a qualifying holding and the directors of the qualifying holding
  - Key function holders of banks, insurers and pension funds
  - Members of a pension fund's investment committee
  - Ultimate beneficial owners for trust offices and exchange institutions
- See the full list at Fit and proper assessments (dnb.nl)
- This page also lists who is assessed by DNB and/or the AFM

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What does DNB assess?

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Types of assessments

1. **Fitness**
   - Does the appointee have sufficient knowledge and experience for the proposed function?

2. **Propriety**
   - Is the appointee's propriety beyond doubt?

3. **Reputation**
   - Is the appointee’s integrity beyond doubt and is the person professionally competent?

Or a combination thereof

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When does DNB conduct an assessment?

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When are assessments conducted?

In the event of:

- a **proposed appointment** before the effective date
- a **proposed change in position** in the board or the company changes significantly
- reasonable grounds for a **reassessment** for fitness and/or propriety

- **Propriety assessments** are one-time procedures, unless there are grounds for a reassessment. Propriety assessment is linked to the individual. Fitness assessment is linked to the proposed function

- Examples of changes in position for which DNB assesses fitness can be found on Open Book Supervision: Change in position (dnb.nl)

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How does DNB conduct the assessment

1. Assessment process

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Assessment process

1. **Supervisors assess application** submitted through MijnDNB (ECB application submitted through IMAS portal)
2. **Check for completeness and background screening**
   - DNB requests information from AFM, tax authorities and Public Prosecution Service (for propriety)
   - DNB investigates public sources and makes enquiries through internal sources and international regulators, if applicable
3. **Form an opinion through thorough investigation**
   - Opinion on whether to conduct a more thorough investigation (request for additional information, assessment interview, check references)
   - Internal input from other departments. Approval cycle, resulting in definitive assessment outcome
4. **Communicate assessment outcome**
   - Positive outcome: written decision communicated to the institution through MijnDNB
   - Negative outcome: explanation is communicated first to the appointee and then to the institution. A provisional written decision is communicated to the institution, who may submit their views and lodge an objection and appeal based on DNB's final decision

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Frequently missing information in an application file

- The **job profile** is not specific
- The **considerations for the appointment** are too superficial. The tasks and responsibilities do not appear to match the job description. The explanation why this appointee meets the criteria is insufficiently substantiated
- **Self-assessment** is not sufficient, e.g. only referring to a resume. The self-assessment needs to be specific and contain clear examples about conduct and experience in past positons
- **Suitability matrix** is incomplete, too vague, too repetitive or unrealistic ratings are given, e.g. rating all skills with ‘Expert'. If this is the case, follow-up questions will be asked and delay the process

Additional information on the assessment process

- Initial assessment – the assessment procedure step by step
- You can track the status of submitted assessment applications in MijnDNB
- DNB is bound by statutory deadlines for conducting the assessment; these differ for each sector. DNB communicates the deadline for concluding the assessment in the confirmation letter upon receiving the assessment filed by the institution
- Objection and appeal may be lodged against our decision
- Two external confidential counsellors can be contacted for filing a complaint about our treatment of the individual or complaint about the process:
  - Diana Monissen-Kok and André Loogman
  - They can be contacted at vertrouwenspersoon.toetsingen@outlook.com
  - More information (Dutch): Vertrouwenspersonen bij toetsingen DNB en AFM

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How does DNB conduct the assessment?

2. Fitness requirements

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Fitness requirements

- Fitness consists of **knowledge, skills and professional conduct**
- DNB establishes this based on **education, work experience and competences**
- **Fitness criteria**:
  - A: Governance, organisation and communication
  - B: Products, services and markets
  - C: Sound and ethical operational management
  - D: Balanced and consistent decision-making
  - E: Sufficient time
- **Proportionate application**, giving due consideration to:
  - Function
  - The institution's type, size and complexity
  - Composition and functioning of the management body as a collective
- Policy Rule on Suitability 2012 (dnb.nl) and Final GL on the assessment of suitability of MB members and KFH (europa.eu)

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How does DNB conduct the assessment?

3. Background checks

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Type of antecedents

- Antecedents play an important role in our investigation into a person's propriety. Antecedents can also affect a person's reputation and/or fitness and may trigger a reassessment

- **Five different types of antecedents:**
  - Criminal antecedents, such as convictions, settlement, (conditional) dropping of charges, acquittal or discharge from prosecution
  - Financial antecedents, such as major private or business-related financial issues and bankruptcies
  - Supervisory antecedents, such as incorrect or incomplete disclosure to a supervisory authority, rejection of a licence application or imposition of a formal or informal measure
  - Tax antecedents, such as personal or business tax offence penalties imposed by a tax authority
  - Other antecedents, such as a disciplinary measure or employment conflict

How does DNB detect antecedents?

- Notifications by supervised institutions (continuous notification requirement)
- Notifications by the individual to be assessed and already assessed (continuous notification requirement)
- Information from government agencies, such as (National) Public Prosecutor, Public Prosecutor's Office, police, tax authorities, Fiscal Intelligence and Investigation Service (FIOD)
- Information from other supervisory authorities, such as the AFM and foreign supervisory authorities
- Information from public sources
- Notifications in the media

How does DNB assess the antecedents

- **Factors taken into consideration:**
  - Nature and severity of offences (category of antecedent)
  - Culpability
  - Time passed
  - Disclosure (reported of own accord or not)
  - Completeness
  - Amount or severity of sanction
  - Individual's position and circumstances of the event or offence
  - Combination of antecedents (multiple antecedents and/or behavioural pattern)
  - Attitude regarding the antecedent, transparancy and explanation of the situation (self-reflection)

- Most antecedents, once reported, do not immediately lead DNB to express a negative opinion on someone's propriety and/or fitness

- See also: Antecedents (dnb.nl)

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How does DNB conduct the assessment?

4. Assessment interview

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When does DNB conduct an assessment interview

- DNB does not invite everyone to an assessment interview; we complete most of the assessments without an assessment interview
- If DNB has a clear understanding about the candidate, it may be decided to conclude the assessment without initiating an assessment interview
- DNB may have additional questions in which case the candidate will be invited for an interview
- The significance of the function or the circumstances at an institution may also provide grounds for an interview. As a rule, DNB is more likely to invite appointees nominated for the function of CEO, chair of the supervisory board or supervisory council, or, in the case of a pension fund, member of the investment committee or investment advisory committee.
- See also: The assessment interview (dnb.nl)

What can the candidate expect during the interview?

- **Open interview** to help DNB form an opinion on fitness, propriety and/or reputation
- As a rule, there are **no more than three interviewers**, including someone from the Expert Centre on Fit & Proper Assessments and someone who supervises the institution
- The **focus** of the interview depends on the proposed function and the circumstances; DNB communicates this to the appointee in advance
- An interview generally **takes a maximum of 1.5 hours**
- Being prepared for the job means being prepared for the assessment interview
- See also: Initial assessment – sample questions (dnb.nl)

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How does DNB conduct the assessment?

5. Reassessment

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Reassessment

- In exceptional circumstances, we may decide to reassess a previously appointed person based on new facts or circumstances, such as non-compliance with laws and regulations which for example results in a fine imposed by a regulator

- This is conducted in the following way:
  1. First, we determine whether these new facts or circumstances provide **reasonable grounds** to initiate a reassessment; if so
  2. DNB informs the person to be reassessed and start the reassessment

- A reassessment may relate to propriety, reputation and/or fitness
- DNB conducts around 5 reassessments per year
- Reassessments are (highly) confidential
- See also: Reassessment (dnb.nl)

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How often does DNB conduct assessments?

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Number of assessments

- Some 2,000 assessments per year
- DNB assists in assessments conducted by foreign supervisory authorities
- 10-15% are in-depth assessments (interviews)
- 3-5% result in a negative outcome; vast majority of assessments have positive outcome
- Approximately 25 positive concluded assessments per year have a condition imposed

Number of Assessments

	2022	2023	2024	2025
Kredietinstellingen	247	244	202	148
Kredietinstellingen 2e echelon	67	70	66	73
Verzekeraars	230	267	174	244
Verzekeraars 2e echelon	38	18	27	18
Overige Wft[1]	453	345	436	282
Pensioenfondsen	369	347	312	293
Betaalinstellingen	285	191	419	467
Trustkantoren	174	117	143	109
Cryptodienstverleners[2]	212	138	238	116
Overige[3]	13	32	42	38
Totaal[4]	**2.088**	**1.769**	**2.059**	**1.788**
Waarvan:				
Positieve uitkomst met voorwaarden	18	44	30	11
Formeel negatief besluit[5]	0	1	0	0
Ingetrokken aanvraag n.a.v. toetsing[6]	8	13	20	8
Ingetrokken aanvraag tijdens toetsingsproces[7]	10	13	3	4
Ingetrokken aanvraag voor toetsingsproces[8]	157	124	95	94
Buiten behandeling gesteld[9]	48	11	17	2
Hertoetsing geschiktheid en/of betrouwbaarheid[10]	3	1	4	0
Percentage negatieve uitkomst[11]	**2%**	**3%**	**3%**	**2%**

1 Toetsingen bij financiële holdings, afwikkelondernemingen, beleggingsondernemingen, beleggingholdings, clearinginstellingen en premiepensioeninstellingen.
2 Sinds 30 december 2024 dienen aanbieders van cryptodiensten een vergunning aan te vragen bij de AFM en toetst DNB uitsluitend de (bestuurders van de) houder van een gekwalificeerde deelneming in de aanbieders van cryptodiensten op betrouwbaarheid en reputatie. Uitgevers van stablecoins (EMT's/ART's) dienen een vergunning bij DNB aan te vragen en de bestuurders, mede-beleidsbepalers en commissarissen worden door DNB op betrouwbaarheid en geschiktheid getoetst. De (bestuurders van de) houders van een gekwalificeerde deelneming van de uitgevers van stablecoins worden ook door DNB op betrouwbaarheid en reputatie getoetst.
3 Toetsingen bij instellingen op de BES-eilanden en bij centrale tegenpartijen (central counterparty of CCP's).
4 Dit totaal bestaat uit de drie soorten toetsingen die DNB uitvoert: toetsingen waarbij DNB op geschiktheid én betrouwbaarheid toetst, toetsingen waarbij DNB alleen op betrouwbaarheid toetst en toetsingen waarbij DNB op reputatie toetst (waarbij DNB vaststelt of de te toetsen persoon betrouwbaar en vakbekwaam is).
5 Zaken waarbij DNB na een toetsingsgesprek tot het oordeel komt dat de kandidaat ongeschikt of onbetrouwbaar is en dit heeft neergelegd in een besluit dat naar de onderneming is verzonden.
6 Zaken waarbij DNB na een toetsingsgesprek tot het oordeel komt dat de kandidaat ongeschikt of onbetrouwbaar is en de instelling besluit om de kandidaat terug te trekken nadat het voornemen tot een negatief besluit door DNB bekend is gemaakt aan kandidaat en onderneming.
7 Zaken waarbij de instelling besluit om de kandidaat gedurende het toetsingsproces terug te trekken, voordat DNB tot een oordeel is gekomen, maar nadat het proces gestart is, bijvoorbeeld na een aanvullende vraag om informatie, of een eerste toetsingsgesprek. Deze categorie werd vóór 2018 niet apart geregistreerd maar was onderdeel van de algemene categorie 'ingetrokken aanvragen'. Vanaf 2018 is deze categorie 'ingetrokken aanvragen' gesplitst in 'ingetrokken tijdens toetsingsproces' en 'ingetrokken voor toetsingsproces'.
8 Zaken waarbij de instelling besluit om de kandidaat terug te trekken voordat DNB is gestart met het toetsingsproces.
9 Zaken die door DNB buiten behandeling zijn gesteld, bijvoorbeeld doordat de instelling de aanvraag niet tijdig heeft aangevuld.
10 Een aantal hertoetsingen zijn in 2025 gestart en zullen in 2026 worden afgerond.
11 Het percentage negatieve uitkomst bij geschiktheid is een optelsom van het aantal formeel negatieve besluiten, het aantal ingetrokken aanvragen n.a.v. toetsing en het aantal ingetrokken aanvragen tijdens toetsingsproces, gedeeld door het aantal toetsingen waarbij DNB op geschiktheid of geschiktheid én betrouwbaarheid heeft getoetst (in 2025: 737).

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Bron: zbo-verantwoording 2025 (bijlage 2)

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Recent developments?

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Recent Developments

CRD6 implementation in the Wft (banks)

As of 22 September 2026, the national second-tier regime for banks has been replaced by a **key function holder (KFH) regime**. This means that DNB/ECB assesses key function holders of **large institutions only** for both **suitability and integrity**.

More information: Fact sheet on the assessment of key function holders at banks and (mixed) financial holding companies

- **Solvency II review (insurers)**

The second-tier regime for insurers will be abolished and replaced by a **KFH regime**. Individuals responsible for the key functions **actuarial, compliance, internal audit and risk management** will be subject to an assessment of their **suitability and integrity**. The legislative texts have not yet been finalised. The envisaged date of entry into force is **31 January 2027**.

- **Reappointments**

As of 1 October 2026, DNB has simplified the procedure for the **reappointment of management board and supervisory board members**. Reappointments no longer need to be notified through **My DNB**. When an individual steps down, the **end date of the appointment must still be communicated to DNB**.

Recent Developments

Changes to fit and proper assessment application forms

- With the introduction of the **key function holder (KFH) regimes for banks and insurers**, the **second-tier application form will be discontinued**. Applications for the assessment of KFHs can be submitted using the regular **Initial Assessment application form**.
- To make the **invoicing of assessment fees** more efficient, applicants will now be asked to provide **billing details** in the assessment application form. Applicants will also be able to provide their own **internal reference**, which will then appear on the invoice. For **ECB assessments**, the **IMAS number** will also be included on the assessment fee invoice. See also: Request for invoicing details for fit and proper assessments | De Nederlandsche Bank
- In addition, DNB is working on the **simplification of the naming and ordering of the application forms in MijnDNB**.

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Additional information & questions

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More information

- Public information on Fit and proper assessments (dnb.nl)
- Video The assessment process explained – YouTube (English captions available)
- Suitablity assessment framework DNB: Policy Rule on Suitability 2012 (dnb.nl)
- Email address of external confidential advisers: vertrouwenspersoon.toetsingen@outlook.com
- Any questions? Drop us a line at: toetsing.expertisecentrum@dnb.nl