

Joint Guidelines Compliance Table

JC 2025 57

21 July 2025

Joint Guidelines on the system established by the European Supervisory Authorities for the exchange of information relevant to the assessment of the fitness and propriety of holders of qualifying holdings, directors and key function holders of financial institutions and financial market participants by competent authorities (JC/GL/2024/88)

The following competent authorities* comply or intend to comply with ESAs' Joint Guidelines :

Competent authority	Complies or intends to comply	Comments
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Member States

AT	Austria	Financial Market Authority (FMA)	Yes	The FMA has been named the competent authority and has been given the necessary competences. The FMA will amend its supervisory practices accordingly to ensure that it uses the FAP Database. https://www.fma.gv.at/wp-content/plugins/dw-fma/download.php?d=7373&nonce=04f93946d8e81a08
BE	Belgium	Banque National de Belgique/ Nationale Bank van België (BNB)	Yes	22/04/2025 Complies as of the date of this notification. - The National Bank of Belgium (NBB) has set up an internal procedure for the automatic upload of notifications regarding fitness and propriety of qualifying holdings, directors and key function holders of financial institutions and financial market participants that fall in its competence (ECB is in charge of a similar procedure for Belgian institutions subject to its direct supervision). For the initiation of the information system, the NBB has provided historical data on assessments regarding the fitness and

		Competent authority	Complies or intends to comply	Comments
				propriety of qualifying holdings, directors, and key function holders of financial institutions, as well as natural persons, for the last five years.
		Financial Services and Markets Authority (FSMA)	Yes	- The NBB published a new version of its privacy statement, warning people that the data the NBB collects in order to assess the fitness and propriety of qualifying holdings, directors and key function holders is uploaded to the ESAs Information System (the publication of this statement can be found on the NBB website via the following link: https://www.nbb.be/en/articles/new-privacy-statement-fit-proper-and-qualifying-holding-assessments) .
		Financial Supervision Commission (FSC)	Yes	The FSC Board's Decision dated 23.04.2025 for full compliance is available at the following link: https://www.fsc.bg/wp-content/uploads/2025/04/249.pdf
BG	Bulgaria	Българска народна банка	Yes	23/04/2025 Complies as of the date of this notification. With Decision # 168/17.04.2025 of the BNB's Governing Council, the Bulgarian National Bank (BNB) shall comply with the Guidelines in line with Title IV - Final provisions and implementation as set out in the guidelines.
HR	Croatia	Hrvatska agencija za nadzor financijskih usluga (HANFA)	Yes	HANFA - Obavijest subjektima nadzora o usklađenju sa Zajedničkim smjernicama o sustavu koji su uspostavila europska nadzorna tijela za razmjenu informacija relevantnih za procjenu primjerenosti imatelja kvalificiranog udjela, članova upravljačkog tijela i nositelja ključnih funkcija u financijskim institucijama te sudionika na financijskim tržištima koju provode nadležna tijela (JC/GL 2024 88) HANFA - Obavijest subjektima nadzora o usklađenju sa Zajedničkim smjernicama o sustavu koji su uspostavila europska nadzorna tijela za razmjenu informacija relevantnih za procjenu primjerenosti imatelja kvalificiranog udjela, članova upravljačkog tijela i nositelja ključnih funkcija u financijskim institucijama te sudionika

		Competent authority	Complies or intends to comply	Comments
				na financijskim tržištima koju provode nadležna tijela (JC/GL 2024 88)
		Hrvatska narodna banka	Yes	10/04/2025 Complies as of the date of this notification. According to Article 208 of the Credit Institution Act (Official Gazette 159/2013, 19/2015, 102/2015, 15/2018, 70/2019, 47/2020, 146/2020, 151/22 and 145/2024) Croatian National Bank may communicate confidential information to the authorities responsible for the supervision of credit institutions and investment firms in the Member States to exercise supervision, oversight and other activities for which they are responsible. The CNB complies with the Joint Guidelines on the system established by the European Supervisory Authorities for the exchange of information relevant to the assessment of the fitness and propriety of holders of qualifying holdings, directors and key function holders of financial institutions and financial market participants by competent authorities as of date of application stated in the Guidelines, i.e. February 12th, 2025. In connection with data protection requirements, Privacy statement for this process will be published on CNB website. Additionally, the main provisions from the Guideline will be incorporated into the competent authorities' internal procedures. Guidelines are published on the CNB website.
CY	Cyprus	Cyprus Securities and Exchange Commission (CySEC)	Yes	The CySEC Board at its meeting held on 14 April 2025 has decided to adopt the <i>Joint Guidelines on the system established by the European Supervisory Authorities for the exchange of information relevant to the assessment of the fitness and propriety of holders of qualifying holdings, directors and key function holders of financial institutions and financial market participants by competent authorities (JC/GL 2024 88)</i>. To this extent, in order to ensure compliance with the aforementioned Guidelines, CySEC has initiated the implementation of relevant internal procedures and an announcement to inform its supervised entities and/or prospective applicants of this decision will be issued shortly.

		Competent authority	Complies or intends to comply	Comments
		Central Bank of Cyprus	Yes	22/04/2025 Complies as of the date of this notification.
		Cyprus Insurance Companies Control (CICC)	Intends to comply**	We have established a governance database for natural persons, but not yet for all legal persons. However, we do have all relevant information for both natural and legal persons in our filing system, facilitating the bilateral exchange of information.
		Registrar of Occupational Retirement Benefit Funds (RORB)	Intends to comply**	Regarding compliance with the joint guidelines on the Fitness and Propriety Information Exchange System (FAPS), we would like to assure you that we are committed to meeting these requirements. Given the high number of IORPs under our supervision (approximately 700) and our limited resources—both in terms of staff and systems—the compliance with the joint guidelines on the FAPS presents a complex challenge.
CZ	Czech Republic	Czech National Bank (CNB)	Yes	https://www.esma.europa.eu/sites/default/files/2025-02/JC_2024_88_ESAs_FPS_CG_Joint_GLs_Final_Report_EN.pdf https://www.cnb.cz/cs/dohled-financni-trh/legislativni-zakladna-obchodnici-s-cennymi-papiry-investicni-zprostredkovatele/metodicke-a-vykladove-materialy/
DK	Denmark	Finanstilsynet	Yes	09/05/2025 Complies as of the date of this notification. For individuals with a CPR number, we have modified the forms to request birthplace and country information when applying for assessment. Additionally, we have updated our internal guidelines to require this information if it is not provided on the assessment form. We have also adjusted our RPA to automatically send the information upon receiving an application.
EE	Estonia	Finantsinspektsioon	Yes	Finantsinspektsioon Management Board decided on 14 of April of 2025 to fully comply with the guidelines. Decision together with the texts of guidelines in English and Estonian can be found on website: https://www.fi.ee/et/juhendid/pangandus-ja-krediit/euroopa-jarelevalveasutuste-uhissuunise-euroopa-jarelevalveasutuste-loodud-susteemi-kohta-mille-abil
ES	Spain	Comisión Nacional del	Yes	The Executive Committee of CNVM confirmed the compliance with the Guidelines on 11 April 2025.

		Competent authority	Complies or intends to comply	Comments
		Mercado de Valores (CNMV)		
		Banco de España	Yes	08/04/2025 Complies as of the date of this notification. The Executive Commission of the Banco de España, within the scope of its competences, adopted these Guidelines as its own on 7 April 2025. The Guidelines will be complied with by the Banco de España through the corresponding supervisory procedures, publicly available.
		Dirección General de Seguros y Fondos de Pensiones	Yes	Regulación
FI	Finland	Finanssivalvonta (FIN-FSA)	Yes	The FIN-FSA has published a supervisory release: https://www.finanssivalvonta.fi/en/publications-and-press-releases/supervisionreleases/2025/joint-guidelines-on-the-system-established-by-the-esas-for-the-exchange-of-information-relevant-to-the-assessment-of-the-fitness-and-propriety--applicable-from-17-february-2025/ The FIN-FSA has also updated its official website, adding this guideline to the list of guidelines issued by the European Supervisory Authorities. https://www.finanssivalvonta.fi/en/regulation/guidelines-of-the-european-supervisoryauthorities/supervisor-guidelines/
FR	France	Autorité des Marchés Financiers (AMF)	Yes	https://www.amf-france.org/fr/actualites-publications/actualites/lamf-applique-les-orientations-des-autorites-europeennes-de-supervision-pour-faciliter-lechange .
		Autorité de Contrôle Prudentiel et de Résolution (ACPR)	Yes	The ACPR complies as of the date of this notification. The ACPR has uploaded historical data regarding the fitness and propriety assessments of natural persons holding qualifying stakes, directors, and key function holders of financial institutions from the past five years into the ESAs Information System. The ACPR has set up an automated upload of ongoing assessments into the ESA's Information System.

		Competent authority	Complies or intends to comply	Comments
				The privacy notice attached to ACPR fitness and propriety questionnaires has been modified to inform the concerned people about the upload of data into the ESAs Information System. Data regarding historical and ongoing assessments on legal persons is set to be uploaded into the ESAs Information System in 2026. The compliance statement has been published on the ACPR website: https://acpr.banque-france.fr/fr/publications-et-statistiques/publications/mise-en-conformite-aux-orientations-des-autorites-europeennes-de-surveillance-aes-relatives-au
DE	Germany	Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin)	Yes	BaFin reports information in relation to the natural person requirements and also fulfils the general parts of the Guidelines. BaFin has not concluded that it can be required also to report legal persons in the exchange System and, thus, does currently not report information in relation to the requirements of the Guidelines on legal persons. BaFin, however, sees merits in exchanging information also on legal persons and intends to report on legal persons by 2030 at the latest (or earlier, depending on the planned establishment of the database and Interface for the automatic data entry). An update to the current compliance status is expected in April 2026, upon the entrance into force of the legal person requirements.
EL	Greece	Hellenic Capital Market Commission (HCMC)	Yes	http://www.hcmc.gr/el_GR/web/portal/esmaguidelines http://www.hcmc.gr/en_US/web/portal/esmaguidelines
		Bank of Greece	Yes	14/04/2025 Complies as of the date of this notification.
HU	Hungary	Magyar Nemzeti Bank (MNB)	Intends to Comply**	The MNB intends to incorporate the regulations of the Joint Guidelines into its internal procedures (by amending the currently effective Vice-presidential Directive 2024–212. on the Procedures for conducting licensing procedures within the scope of the Licensing and Legal Enforcement of Financial Institutions Directorate) by the application dates included in the Joint Guidelines (from 15 May 2025 for the assessments of natural persons, and from 30 April 2026 for the evaluations of legal persons), thus the internal proceedings have been initiated to bring into force

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				necessary to comply with the Joint Guidelines. The available historical data upload on natural persons for the last five years began at the end of February 2025, and it shall be done by 1 July 2025. The upload of available historical data on legal persons for the last two years, calculated from 30 January 2026, will be done by 30 April 2026.
IE	Ireland	Central Bank of Ireland	Yes	The requirements of the Guidelines will be incorporated into the Central Bank of Ireland supervisory processes and practices. The Central Bank of Ireland has included the ESA privacy statement and links to the Guidelines to the Fitness and Probity communications page on our website.
		Pensions Authority (TPA)	Intends to comply**	TPA is in the process of assigning responsibility internally for tasks required under the GLs in order to input designated contacts and establish protocols to ensure compliance with the ongoing requirements of the GLs. In relation to requirements under paragraph 22, TPA is considering whether any assessments within the meaning of the GLs have been made in the past five years.
IT	Italy	Commissione Nazionale per le Società e la Borsa (CONSOB)	Yes	Consob published a decision on 16 April 2025: Avviso Consob del 16 aprile 2025 - AREA PUBBLICA - CONSOB
		Banca d'Italia	Yes	17/04/2025 Complies as of the date of this notification. Banca d'Italia implemented the Joint Guidelines in Italy through "Supervisory Guidelines" published on the institutional website at: https://www.bancaditalia.it/compiti/vigilanza/normativa/orientamenti-vigilanza/elenco-esa/note/Nota-n-49-dell-8-aprile-2025.pdf
		Commissione di Vigilanza sui Fondi Pensione (COVIP)	Intends to comply**	COVIP intends to comply. So far, the information on individuals holding relevant positions in Italian IORPs has been available to Covip only on paper. A new reporting system is currently being organised, allowing for the collection and storage of data

		Competent authority	Complies or intends to comply	Comments
				in a structured and machine-based manner. A first set of data suitable for transmission to the ESA is likely to be available by the end of 2025 and will be periodically updated. Historical data will remain available only on paper and therefore will not be suitable for transmission.
		Istituto per la Vigilanza sulle assicurazioni (IVASS)	Yes	IVASS can comply by providing information required by the EU directives in force concerning the insurance sector. See, in particular, Insurance Code, Section d. MISE 2 May 22n. 88 and IVASS Regulation n. 40/2018
LV	Latvia	Latvijas Banka	Yes	Latvijas Banka complies with the Joint Guidelines and will submit all the necessary information as requested by the Guidelines.
LT	Lithuania	Bank of Lithuania	Yes	The compliance with the GL has been approved at the Financial Market Supervision Committee by its decision No. V 2025/(1.160.E-9004)-441-47, on 8 April 2025. Lietuvos Banka decision: 51884_5084c4383146f8fe128a251fe1f74574.pdf
LU	Luxembourg	Commission de Surveillance du Secteur Financier (CSSF)	Yes	27/06/2025 Complies as of the date of this notification
		Commissariat aux Assurances (CAA)	Yes	
MT	Malta	Malta Financial Services Authority (MFSA)	Yes	19/05/2025 Complies as of the date of this notification.
NL	Netherlands	Autoriteit Financiële Markten (Authority for the Financial Markets)	Yes	Explanation of the AFM on the ESA guidelines
		De Nederlandsche Bank N.V. (DNB)	Yes	14/03/2025 Complies as of the date of this notification
PL	Poland	Komisja Nadzoru	Yes	The KNF complies with the guidelines. All changes necessary for the exchange of information through the means of system established by the ESAs where introduced

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		Finansowego (KNF)		in the national legislation, taking effect in September 2023, i.e. the addition of Article 17ce of the Law of July 21, 2006 on financial market supervision (Journal of Laws 2024, item 135, as amended).
PT	Portugal	Comissão do Mercado de Valores Mobiliários (CMVM)	Yes	CMVM website
		Banco de Portugal	Intends to Comply**	21/04/2025 Intends to comply when necessary, legislative or regulatory proceedings have been completed Banco de Portugal intends to comply with the Guidelines. However, there are national specificities that do not require the collection of certain data, as it is not necessary for fit and proper assessments and is not included in the Portuguese identification document (e.g., place of birth and aliases other than the full register name). Considering the constraints previously communicated, Banco de Portugal has no register of several data regarding historical information, which, consequently, will not be provided (e.g. place of birth and other AKAs). As permitted by JC/GL 2024 88, regarding historical data, Banco de Portugal will provide alternative data that allows for the full identification of the assessed persons, such as a Passport, ID, or Fiscal Number. Legal approvals and regulatory amendments, as well as IT developments, are in progress to enable the collection of required data on new assessments by Banco de Portugal and its provision to the system. Banco de Portugal intends to comply with the GL as soon as the necessary legal and regulatory approvals, as well as IT developments, are completed.
		Autoridade de Supervisão de Seguros e Fundos de Pensões (ASF)	Yes	
RO	Romania	Romanian Financial	Yes	The provisions of the guidelines are incorporated in the ASF internal processes which are not publicly available.

		Competent authority	Complies or intends to comply	Comments
		Supervisory Authority (ASF)		
		Banca Națională a României (BNRO)	Yes	13/06/2025 Complies as of the date of this notification The communicate has been posted at the following link: https://www.bnr.ro/24580-2025-06-13-ghid-comun-eba-eiopa-esma-jc-gl-2024-88
SK	Slovakia	National Bank of Slovakia (NBS)	Yes	https://nbs.sk/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/spolocne-usmernenia-z-20-novembra-2024-c-jc-gl-2024-88-o-systeme-zriadenom-europskymi-organmi-dohladu-na-vymenu-informacii-relevantnych-pre-posudzovanie-vhodnosti-a-sposobilosti-drzitelov-kvalifikov/ https://nbs.sk/en/dohlad-nad-financnym-trhom/legislativa/legislativa/detail-dokumentu/joint-guidelines-of-20-november-2024-no-jc-gl-2024-88-joint-guidelines-on-the-system-established-by-the-european-supervisory-authorities-for-the-exchange-of-information-relevant-to-the-asses/
		Securities Market Agency (ATVP)	Yes	The Agency's Council (Board) decided on the compliance with the Guidelines on 27 March 2025. It was published here on 11 April 2025.
SI	Slovenia	Banka Slovenije (BSI)	Yes	22/04/2025 Complies as of the date of this notification. Regulation on the application of the Joint Guidelines on the system established by the European Supervisory Authorities for the exchange of information relevant to the assessment of the fitness and propriety of holders of qualifying holdings, directors and key function holders of financial institutions and financial market participants by competent authorities was published in the Official Gazette of the Republic of Slovenia, No. 26/2025 (page 2615) of 18 April 2025.
		Insurance Supervision Agency (AZN)	Yes	On 2 April 2025, the Slovenian Insurance Supervision Agency (hereinafter: AZN) published on its website a document ("Application of the Joint GLs on the Fitness and Propriety Information Exchange System") to inform the supervised entities/persons of interest about the adoption, application and content of Joint GLs on the Fitness and

		Competent authority	Complies or intends to comply	Comments
				Propriety Information Exchange System (hereinafter: Joint GLs). In this document, the AZN also announced that it would take into account the provisions of the Joint GLs and revealed the Privacy Statement prepared by ESAs' DPOs. The document is available at: https://www.a-zn.si/wp-content/uploads/SKM_C550i25040211171.pdf Furthermore, the AZN updated its website notice concerning the processing of personal data, including the explanation related to the ESA's IT system. The ESA's document DATA PROTECTION STATEMENT - ESAs INFORMATION SYSTEM was translated into the official language in the Republic of Slovenia and published on the AZN website (https://www.a-zn.si/o-agenciji/varstvo-osebnih-podatkov/)
SE	Sweden	Finansinspektio nen (FI)	Yes	https://www.fi.se/sv/publicerat/nyheter/2025/fi-foljer-riktlinjer-om-utbyte-av-information-i-samband-med-lamplighetsproving/

EEA EFTA States **

IS	Iceland	Central Bank of Iceland	Intends to comply**	Compliance by 1 April 2026. The ESAs Review Acts are in the process of being incorporated into the EEA Agreement and A legislative proposal to implement the Acts into the Icelandic legal order is expected to be submitted to the Icelandic Parliament in the second half of 2025 with entry into force in early 2026.
LI	Liechtenst ein	Finanzmarktauf sicht (FMA)	Yes	The FMA Liechtenstein has developed a module within its existing IT infrastructure to ensure an automatic upload to the ESAs Information System within the timeframe specified in the Guidelines. https://www.fma-li.li/de/regulierung/regulierungen-der-europaischen-aufsichtsbehorden/guidelines.html
NO	Norway	Finanstilsynet	No response	

		Competent authority	Complies or intends to comply	Comments
EU Body				
ECB	European Central Bank	DG-HOL/SPO/IP	Yes	19/05/2025 Complies as of the date of this notification

*The EEA States other than the Member States of the European Union are required to notify their compliance with EBA guidelines and recommendations relating to a legislative act which has been incorporated into the EEA Agreement, and otherwise provide the information on a voluntary basis.

** Please note that, in the interest of transparency, if a competent authority continues to intend to comply after the application date, it will be considered “non-compliant” unless (A) the Guidelines relate to a type of institution or instruments which do not currently exist in the jurisdiction concerned; or (B) legislative or regulatory proceedings have been initiated to bring any national measures necessary to comply with the Guidelines in force in the jurisdiction concerned.

Notes

Article 16(3) of Regulation (EU) No 1095/2010 (the ESMA Regulation) requires national competent authorities to inform us whether they comply or intend to comply with each set of guidelines or recommendations we issue. If a competent authority does not comply or does not intend to comply, it must inform us of the reasons. We decide on a case-by-case basis whether to publish reasons.

ESMA endeavours to ensure the accuracy of this document, however, the information is provided by the competent authorities and, as such, ESMA cannot accept responsibility for its content or any reliance placed on it.

For further information on the current position of any competent authority, please contact that competent authority. Contact details can be obtained from our website (www.esma.europa.eu).