

# **Onboarding Questionnaire**

# Aim of the questionnaire and how to complete it

The questionnaire contains the questions necessary for the processing of client access requests pursuant to Article 37 of Regulation (EU) No 2017/392 and for monitoring the continued compliance of clients, which must be completed by any client wishing to join KELER prior to joining and at the frequency defined by KELER.

The questions are aimed at identifying legal / compliance, financial and operational risks.

KELER evaluates the answers to the questions on a risk basis, so it considers the legal/compliance, financial and operational risk factors in such a way that compliance with them supports the security, integrity and reputation of KELER and KELER's clients. Your organisation becoming a client and your continued operation as a client shall not result in any way in KELER's violating any law, regulation, regulation or its own rules, whether in tax, money laundering or legal terms. Should any of these arise, KELER shall have the right to request any further information, documentation, on-site inspection, ordering test cases and to establish conditions that will prevent KELER from being subject to any breach of its law and regulations.

Please write the answers to our questions in the light blue boxes and, in case of re-filling, make your changes appear in the original document with the track changes function.

Thank you for your co-operation!



# I. Compliance with legal criteria

#### Sanctions

Does your organisation have headquarter / branch / establishment which invests, operates or plans to operate in Cuba / Crimea / Iran / North Korea / Sudan / Syria or do business in these geographical areas?	□ Yes □ No
Does your organisation have any business relationship with any natural or legal person resident in Cuba / Iran / North Korea / Sudan / Syria or with any legal person owned or controlled, directly or indirectly by a natural or legal person resident in Cuba / Iran / North Korea / Sudan / Syria, including intermediaries acting or involved in the transaction on behalf of or in the name of Cuban / Crimean / Iranian / North Korean / Sudanese / Syrian legal entities?	□ Yes □ No

How does your organisation ensure that your account is used properly? Please briefly describe your procedure! (E.g.: automated monitoring, manual controls or other measures.)



### II. Compliance with financial criteria

Please confirm that your organisation has sufficient financial resources to meet its future contractual obligations to the CSD.

Confirmed

Not confirmed

Is your organisation certified by an international credit rating agency(ies)?

If so, please provide the most recent published credit rating for your organisation and the name of the credit rating agency.

If your organisation does not have a public credit rating, please name your parent company and provide its most recent public credit rating(s) and the name of the credit rating agency.

Yes. Own credit rating:

Name of credit rating agency:

No. Name of parent company:

Credit rating of parent company:

Name of credit rating agency:



# III. Compliance with operational criteria

### III.1. Questions on risk management

Does your organisation perform stress tests on a regular basis?

	Is the risk relevant?	Do you perform stress tests?
Stress test for operational risks	□ Yes	□ Yes
	□ No	□ No
Stress test for market risks	□ Yes	□ Yes
	□ No	□ No
Stress test for credit and counterparty risks	□ Yes	□ Yes
	🗆 No	□ No

Please confirm that your stress testing methodology is documented in your internal policies, which are regularly reviewed and reported to the management:

The stress test methodology has been laid down in internal rules.	<ul> <li>Confirmed</li> <li>Not confirmed. If not, please specify:</li> </ul>
The document describing the stress tests is being reviewed:	<ul> <li>Six-monthly</li> <li>Annually</li> <li>Biannually</li> <li>Other. Please specify:</li> </ul>
The results of stress tests that reveal the risks are reported to:	<ul> <li>The Board of Directors</li> <li>The management/executive board</li> <li>Other governing bodies</li> <li>Not reported</li> </ul>



Please provide information on whether the following applied to your organisation in the past 36 months:

• litigation jeopardizing the organisation's operation (even pending),

• your organization is subject to a penalty, measure or decision by the authorities.

Confirm that your organisation has and applies risk management policies that ensure that credit, market, liquidity and concentration risks arising from business activities between your clients and the organisation(s) that provide you with liquidity (i.e. the parent company) are properly managed. Please confirm that relevant processes are documented in internal policies and that compliance is regularly monitored and reviewed.

The organisation has risk management principles to manage credit, market, liquidity and concentration risks arising from the business activities.	Confirmed Not confirmed
The policy containing the risk management principles is regularly reviewed:	<ul> <li>Six-monthly</li> <li>Annually</li> <li>Biannually</li> <li>Other. Please specify:</li> </ul>

Please specify whether, for the last two financial years, your organisation has encountered any fault interrupting or halting operation that has led to a significant reduction or total loss of service quality (for example: permanent disruption of Internet-based service, inability to deliver services, inaccessible service, cases that disturb your daily processes, etc.). In the details, indicate these problematic events, their duration, the number of errors, and their loss.

Please explain any incidents that have significantly reduced the quality of service for more than 3 months and the steps your organisation has taken to address them.



Please confirm that your organisation has internal processes in place to measure and manage operational risks across all areas of your organisation:

The organization has:

A person with operational risk management responsibilities (e.g.: Operational Risk Manager)	<ul><li>Yes</li><li>No</li></ul>
Contact persons responsible for operational risk	<ul><li>Yes</li><li>No</li></ul>
Committee managing operational risk (i.e: Operational Risk Management Committee)	<ul><li>Yes</li><li>No</li></ul>

Please confirm that the rules for the identification, measurement, management and reporting of operational risks, the rules for the collection of operational risk and other indicators and the procedures for the collection of operational risk events are set out in internal regulatory frameworks which are regularly reviewed.

The organisation has a risk management framework and framework for managing operational risks.	Confirmed Not confirmed
The date of the revision of the policy containing the Operational Risk Management principles is repeated on a regular basis:	<ul> <li>Six-monthly</li> <li>Annually</li> <li>Biannually</li> <li>Other. Please specify:</li> </ul>



### III.2. Business Continuity (BCP), Disaster Recovery (DRP), Security Management and Technology System Protection

The information security questions (below) of the questionnaire do not need to be answered if KELER is provided with an information security certificate of your organisation. Please present the following:

- certification report / certificate,
- name of the certifier
- scope of certification
- name of the standard applied.

If you either do not have certification or you do present it to KELER or the scope of the certification is not KELER relevant (see relevant access criteria), please answer the questions below.

KELER reserves the right to request answers to the questions below despite certification.

### **Business Continuity Capabilities (BCP)**

Interpreted for KELER related processes

Please confirm that you have the following documentation for business continuity purposes. (Multiple answers are possible.)	<ul> <li>BCP Strategy and Regulations</li> <li>BCP plans updated within one year per process</li> <li>Testing minutes for BCP Plans</li> <li>Records of BCP events</li> </ul>
Confirm that your business continuity policy and strategy addresses the following. (Multiple answers are possible.)	<ul> <li>Responsible persons and their duties</li> <li>Classification criteria of crisis</li> <li>Preparing for a crisis situation</li> <li>Response to a crisis situation</li> <li>Communication tasks</li> <li>Reporting obligation</li> <li>Business Continuity training</li> <li>Business Continuity Testing</li> </ul>
Confirm that your business continuity plans are regularly tested. (Only one answer is possible.)	<ul> <li>We test them at least annually</li> <li>We test them, but less frequently than annually</li> <li>We do not test them</li> </ul>
Confirm that improvements have been made to test plans due to deficiencies discovered during business continuity testing. (Only one answer is possible.)	<ul> <li>Confirmed</li> <li>No such measures were required</li> <li>Not confirmed</li> </ul>
Please specify when the last BCP test took place.	(year)



Confirm that you have a alternative office site. (Only one answer is possible.)	Confirmed Not confirmed
Confirm that your business continuity critical workforce has access to all necessary systems. (Only one answer is possible.)	Confirmed Not confirmed

# Disaster Recovery Capabilities (DRP)

Interpreted for KELER related processes

Please confirm that you have the following documentation for disaster recovery purposes. (Multiple answers are possible.)	<ul> <li>DRP Strategy and Regulations</li> <li>DRP plans updated per process/system within one year</li> <li>Testing minutes for DRP Plans</li> <li>Records of DRP events</li> </ul>
Confirm that the disaster recovery policies and strategies address the following: (Multiple answers are possible.)	<ul> <li>Responsible persons and their duties</li> <li>Preparing for disaster recovery situation</li> <li>Post-disaster recovery tasks</li> <li>Disaster Recovery training</li> <li>Disaster Recovery Testing</li> <li>Contact details of external service providers</li> </ul>
Confirm that your disaster recovery plans are regularly tested. (Only one answer is possible.)	<ul> <li>We test them at least annually</li> <li>We test them, but less frequently than annually</li> <li>We do not test them</li> </ul>
Confirm that improvements have been made in test plans due to deficiencies discovered during disaster recovery testing. (Only one answer is possible.) Please specify when the last DRP test was performed.	<ul> <li>Confirmed</li> <li>No such measures were required</li> <li>Not confirmed</li> <li>(year)</li> </ul>
Confirm that their disaster recovery critical workforce has access to all necessary systems. (Only one answer is possible.)	<ul> <li>Confirmed</li> <li>Not confirmed</li> </ul>
Confirm that your organisation has an RTO (Recovery Time Objective) value for CSD relevant processes. (Only one answer is possible.)	<ul> <li>Less than 2 hours</li> <li>Between 2 and 8 hours</li> <li>More than 8 hours</li> </ul>



# Security management system

	1
Confirm that you have an information security organisation that is independent of other departments. <i>(Only one answer is possible.)</i>	Confirmed Not confirmed
Does your organisation have a quality assurance certification for information security (e.g.: ISO27001)? (Only one answer is possible.)	Yes. If yes, please specify the type, scope and date of certification:
	□ No
Does your organisation have a management-approved information/cyber-security strategy that covers future threats and planned improvements?	Yes. If so, please provide the date of your last review:
(Only one answer is possible.)	🗆 No
Does your organisation have a management-approved information security/cybersecurity policy that includes management's commitment to meeting its security objectives?	Yes. If yes, please provide the date of entry into force of the current version:
(Only one answer is possible.)	□ No
Please confirm that your organisation has the following documents: (Multiple answers are possible.)	<ul> <li>Business impact and risk analysis based on international methodology</li> <li>Business impact analysis updated within one year</li> <li>Information security risk analysis updated within</li> </ul>
	<ul> <li>Action plan or risk list accepted by management</li> </ul>
Does your organisation have an information security policy that sets out the duties and responsibilities of users, IT, security, technology controls applied?	Yes. If yes, please provide the date of entry into force of the current version:
(Only one answer is possible.)	□ No
Please indicate which of your users have security awareness training for your organisation. (Multiple answers are possible.)	<ul> <li>Security training for new joiners</li> <li>Annual mandatory security awareness training</li> <li>Annual mandatory security awareness test</li> <li>Regular Safety Awareness Newsletter or Tests</li> </ul>
Does your organisation have a list of security requirements for system development? (Only one answer is possible.)	Confirmed Not confirmed



Frequency of reviewing information security / cybersecurity policies and regulations within the	🗆 Annually
organisation:	🗆 Biannually
(Only one answer is possible.)	□ If none, please provide frequency:
Confirm that your organization has an up-to-date list of critical service providers.	Yes. If yes, please provide the date of your last review:
	□ No
If you join KELER as a CSD or market infrastructure, please list the critical service providers you have used. <sup>1</sup>	
Does your organisation outsource information security functions or processes? (Only one answer is possible.)	Yes. If yes, please identify the security processes, party(ies) involved and specify its headquarter(s).
	🗆 No

<sup>&</sup>lt;sup>1</sup> Pursuant to Article 69 (2) (a) of Commission Delegated Regulation 2017/392.



# Security technologies

What information security technical controls and	Network security
processes do you have? (Multiple answers are possible.)	Firewall protection
	Web Application Firewall
	□ Intrusion Detection / Prevention System
	Network Access Control
	Network separation
	Web and mail filtering systems
	Endpoint protection
	□ Virus and malware protection
	Disk encryption for End User devices
	□ Mobile device protection
	Security Monitoring
	Central security event management system
	Periodic Vulnerability Test
	Incident management process
	Regular security training
	Physical security
	□ Video surveillance system
	Access Control System
	Physical intrusion protection system
	Manned security
	Building surveillance systems
	Data security
	Data leakage protection
	□ File encryption
	Database encryption
	□ Mail encryption
	Access management
	User and authorisation management system
	Two-factor identification
	Technical user and password management solution



Confirm that over the past two years, the oversight authority has carried out a comprehensive information security audit at your organisation.	Confirmed. Please provide the name and the seat of the authority:
(Only one answer is possible.)	
	Not confirmed
Confirmation that over the past two years an independent audit firm has conducted a comprehensive information security audit of your organisation:	Confirmed. Please enter your company name and registered office:
(Only one answer is possible.)	
	Not confirmed
Please indicate the highest risk level of the observations made in the last two years.	
Confirm that you have a plan of action to remediate findings or management risk acceptation. (Only one answer is possible.)	Confirmed Not confirmed
Have you experienced outside breaches of your system security rules in the last 12 months? (Only one answer is possible.)	Yes. If so, how do you reduce the risk of recurrence of similar events?
	□ No

# III.3. Questions related to the organisation's IT systems

### Data centre redundancy

Confirm that you have a backup (secondary) data centre.	Confirmed. Please enter the distance between your data centres (in km):
(Only one answer is possible.)	km
	Not confirmed

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#### Backup policy and strategy

Please confirm that your organisation has one of the structured back-up solutions. (Multiple answers are possible.)	<ul> <li>Real time</li> <li>Mirrored with delay</li> <li>Daily</li> <li>Weekly</li> <li>Other</li> </ul>
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#### Capacity management

Confirm that your organisation has capacity management. (Only one answer is possible.)	A capacity plan, supported with monitoring system and historical data, is prepared at least once a year
	<ul> <li>There is only a monitoring system</li> <li>Not confirmed</li> </ul>

### III.4. Operation questions

Please provide the average number of daily transactions you are expected to submit annually on paper.	
How many of the average daily expected paper- based transactions are expected to be in EUR currency, DVP settlement, affecting the Hungarian market.	
Please indicate the currencies in which you plan to make settlement.	
Is your organisation ready to communicate via SWIFT and / or KID (KELER Interface Device - KELER's own online system)? If not, how do you envisage communication?	<ul> <li>Yes</li> <li>No, we envisage communication as follows:</li> </ul>

I hereby certify that the above provided facts and information are true and correct.

I declare that I will inform KELER immediately if there is any change in the information, circumstances or conditions presented in the questionnaire regarding the organisation I represent.



### Client / Organisation name

Respondent's name, position, contact details (email/phone)

Authorised signatory's name:Authorised signatory's name:Position:Position:Organisation name:Organisation name:(Place):, (Date):