

Case No: 79430
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EFTA SURVEILLANCE
AUTHORITY

REASONED OPINION

delivered in accordance with Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice concerning Liechtenstein's failure to fulfil its obligations arising from Articles 2(2)(a) and 7(2) of Directive 2004/38/EC considering third-country national family members of EEA nationals as no longer fulfilling the conditions for the granting of a residence permit and revoking those permits in the situations where the spouses have initiated divorce proceedings

1 Introduction

1. This reasoned opinion concerns the implementation and application by Liechtenstein of Directive 2004/38/EC¹ in the context of divorce proceedings. The EFTA Surveillance Authority (“the Authority”) is of the opinion that Liechtenstein is breaching Articles 2(2)(a) and 7(2) of Directive 2004/38/EC by considering third-country national family members of EEA nationals as no longer fulfilling the conditions for the granting of a residence permit and revoking those permits in the situations where the spouses have initiated divorce proceedings.

2 Correspondence

2. By a letter dated 11 August 2016 (Doc. No 814537), the Authority informed the Liechtenstein Government that it had received a complaint against Liechtenstein concerning the implementation and application of Directive 2004/38/EC in the context of divorce proceedings.
3. A request for information was sent to Liechtenstein on 26 September 2016 (Doc. No 819025).
4. The Liechtenstein Government responded by letter of 8 November 2016 (ref. 9421.2-Anh. V RL 2004/38/EG, Doc. No 825505).
5. On 29 March 2017 (Doc. No 826617), the Authority issued a letter of formal notice to Liechtenstein where it concluded that by maintaining in force national provisions under which third-country national family members of EEA nationals are not considered as fulfilling the conditions for the granting of a residence permit and their permits are revoked in the situations where the spouses do not have a common residence anymore and/or have initiated divorce proceedings and where the EEA nationals at issue are still enjoying their rights of residence in Liechtenstein, such as Articles 40 and 52(1)(b) of the Act of 20 November 2009 on the right of EEA and Swiss citizens to free movement and residence², Liechtenstein has failed to fulfil its obligations arising from Articles 2(2)(a) and 7(2) of Directive 2004/38/EC.
6. After the extension of the deadline, the Liechtenstein Government replied to the letter of formal notice by letter of 6 July 2017 (ref. 9421.1 – Art. 28, Doc. No 864778).
7. The case was discussed at the package meeting in Liechtenstein on 11 and 12 May 2017³.

3 Relevant national and EEA law

8. For the account of relevant national and EEA law the Authority refers to, correspondingly, **Part 3** and **Part 4** of the letter of formal notice.

¹ Act referred to at point 3 of Annex VIII to the EEA Agreement (*Directive 2004/38/EC of the European Parliament and of the Council of 29 April 2004 on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States amending Regulation (EEC) No 1612/68 and repealing Directives 64/221/EEC, 68/360/EEC, 72/194/EEC, 73/148/EEC, 75/34/EEC, 75/35/EEC, 90/364/EEC, 90/365/EEC and 93/96/EEC*), as adapted to the EEA Agreement by Protocol 1 thereto.

² *Gesetz vom 20. November 2009 über die Freizügigkeit von EWR- und Schweizer Staatsangehörigen, Personenfreizügigkeitgesetz, PFZG, LR 152.2*, as last amended.

³ See follow-up letter to the package meeting (Doc. No 858353).

4 The Authority's Assessment

4.1 The breach by Liechtenstein of Articles 2(2)(a) and 7(2) of Directive 2004/38/EC

9. The Authority holds the opinion that by maintaining in force national provisions under which third-country national family members of EEA nationals are no longer considered as fulfilling the conditions for the granting of a residence permit and their permits are revoked in the situations where the spouses have initiated divorce proceedings and where the EEA nationals at issue are still enjoying their rights of residence in Liechtenstein, Liechtenstein is infringing Articles 2(2)(a) and 7(2) of Directive 2004/38/EC.
10. In particular, as also specified in **paragraphs 20-36** of the letter of formal notice, the national provisions in the Act of 20 November 2009 on the right of EEA and Swiss citizens to free movement and residence⁴ (“the PFZG”) are interpreted and applied by Liechtenstein in a way that decisions revoking residence permits of third-country national family members of EEA nationals are adopted on the ground that the spouses have initiated divorce proceedings.
11. As is also explained by Liechtenstein in the reply to the letter of formal notice, as soon as the competent immigration authority acquires knowledge that the spouses have initiated divorce proceedings, it invites them both or only the spouse with a third-country nationality to a hearing.
12. If the conditions set out in Article 47 of the PFZG are not met, the third-country national family member is no longer considered as fulfilling the conditions for the granting of a residence permit and the permit is revoked according to Article 52(1)(b) of the PFZG.
13. The Authority notes, however, that in its judgment of 8 November 2012, *Iida*⁵, the Court of Justice of the European Union (“the Court of Justice”), relying on its previous case law concerning the instruments of EEA law prior to Directive 2004/38/EC⁶, stated that the marital relationship in connection to Directive 2004/38/EC cannot be regarded as dissolved as long as it has not been terminated by the competent authorities, and that is not the case where the spouses merely live separately, even if they intend to divorce at a later date. Therefore, in order to hold a derived right of residence, the spouse does not necessarily have to live permanently with the EEA national⁷. Actually, in order to be regarded as a “*family member*” within the meaning of Article 2(2)(a) of Directive 2004/38/EC of an EEA national who has exercised the right to freedom of movement, that provision does not require the person concerned to satisfy any conditions other than that of being a spouse⁸. Even the fact that the spouses not only ceased to live together but also resided with other partners, is irrelevant for the purposes, for example, of the acquisition by a third-

⁴ *Gesetz vom 20. November 2009 über die Freizügigkeit von EWR- und Schweizer Staatsangehörigen, Personenfreizügigkeitsgesetz, PFZG, LR 152.2, as last amended.*

⁵ Judgment of 8 November 2012, *Iida*, C-40/11, EU:C:2012:691.

⁶ Judgment of 13 February 1985, *Diatta*, 267/83, EU:C:1985:67.

⁷ Judgments of 8 November 2012, *Iida*, C-40/11, EU:C:2012:691, paragraph 58, and 10 July 2014, *Ogieriakhi*, C-244/13, EU:C:2014:2068, paragraph 37.

⁸ Judgment of 8 November 2012, *Iida*, C-40/11, EU:C:2012:691, paragraph 57.

country national family member of an EEA national of a right of permanent residence under Article 16(2) of Directive 2004/38/EC⁹.

14. Although the case law discussed in paragraph 13 above concerned situations of *de facto* separation of spouses, in the view of the Authority, it is equally applicable to the situations where formal divorce proceedings have been initiated, but not yet concluded.
15. In this regard, it should be recognised that this case law concerns the interpretation of the term “*spouse*” in Article 2(2)(a) of Directive 2004/38/EC generally, for the purposes of the application of the Directive as a whole. Therefore, it is relevant for all the situations falling under the scope of this Directive (issue of residence cards, acquisition of the right of permanent residence, retention of the right of residence under Articles 12 and 13 of Directive 2004/38/EC *etc.*), regardless of whether or not they have been specifically addressed by the Court of Justice.
16. The reading of Directive 2004/38/EC to the effect that a third-country national does not lose his status as a “*spouse*” under Article 2(2)(a) in situations where divorce proceedings have been initiated but not yet concluded, is also confirmed by the teleological, verbal and systemic interpretation of the Directive.
17. As to the teleological approach, Recital 15 of the Preamble to the Directive indicates that the Directive aims, *inter alia*, to provide legal safeguards for family members in the event of divorce or the annulment of marriage. This recital goes on to specify that “*with due regard for family life and human dignity, and in certain conditions to guard against abuse, measures should therefore be taken to ensure that in such circumstances family members already residing within the territory of the host Member State retain their right of residence exclusively on a personal basis*”.
18. Consequently, Article 13(2) of Directive 2004/38/EC settles the problem of the right of residence of third-country family members of Union citizens where the marriage is ended by divorce or annulment. The purpose of this provision is to provide certain legal safeguards to people whose right of residence is dependent on a family relationship by marriage and who could therefore be open to blackmail with threats of divorce. It must be specified that, for reasons of legal certainty, for a marriage to count as dissolved a decree absolute must have been granted; in the event of *de facto* separation, the spouse’s right of residence is not affected at all¹⁰.
19. These objectives would not be reached, if EEA States were able to revoke residence cards of third-country national family members of EEA nationals in cases where divorce proceedings have been initiated.
20. Next, having regard to the wording of Article 13(2), it should be noted that this provision contains both the term “*divorce*” and the term “*initiation of the divorce or annulment proceedings*”. As these terms are used as distinct concepts within the context of this provision, the term “*divorce*” cannot be interpreted as encompassing the aspect of the initiation of divorce proceedings, as in such a case the phrase in Article 13(2)(a) of Directive 2004/38/EC “*prior to initiation of the divorce or annulment proceedings*” would be devoid of its purpose.
21. Finally, the Liechtenstein Constitutional Court’s recent case law (*StGH* 2016/70, point 5) clarifies that Article 47 of the PFZG is only applicable in cases where the

⁹ Judgment of 10 July 2014, *Ogieriakhi*, C-244/13, EU:C:2014:2068, paragraph 38.

¹⁰ Proposal for a European Parliament and Council directive on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States (COM (2001) 257 final).

marriage has been dissolved or annulled and that third-country national family members of an EEA national cannot obtain an autonomous right of residence under Article 47(3) of the PFZG as long as the marriage is not dissolved or annulled. Taking into account the system of Directive 2004/38/EC, this confirms that the third-country national family member's derived right of residence may only be withdrawn from the dissolution or annulment of the marriage. Otherwise, the third-country national at issue would be deprived of the possibility to retain the right of residence on a personal basis pursuant to Article 47(3) of the PFZG implementing Article 13(2) of Directive 2004/38/EC.

22. Consequently, the Authority holds the view that even if formal divorce proceedings have been initiated, the third-country national family member of an EEA national who is enjoying the right of residence in Liechtenstein retains the derived right of residence under Article 7(2) of Directive 2004/38/EC as long as the marital relationship has not been terminated by the competent authorities.
23. Therefore, if the EEA national is still enjoying the right of residence in Liechtenstein, the date from which the derived right to residence ends and Article 13(2) of Directive 2004/38/EC is triggered, is the date of the final divorce, since, in the event, for example, of *de facto* separation, the right of residence of a third-country national spouse is not at all affected¹¹. The same holds true as regards the initiation of formal divorce proceedings.

4.2 The reply of the Liechtenstein Government to the letter of formal notice

4.2.1 As to the scope of the infringement proceedings

24. In its reply to the letter of formal notice, the Liechtenstein Government clarifies that due to recent developments in the case law of the Liechtenstein Constitutional Court (*StGH* 2016/66, point 5.2.1 and *StGH* 2016/70, point 5), the competent Liechtenstein authorities adapted their administrative practice in so far as the procedure of checking a third-country spouse's right of residence is limited to cases where either divorce proceedings have been initiated or an abuse of residence rights is suspected. The fact that the spouses no longer have a common residence is not sufficient in itself to trigger the procedure. Further, the Liechtenstein Government explains that the fact that the spouses have initiated divorce proceedings does not automatically lead to the revocation of the residence permit of the spouse with third-country nationality, but it may result in such a revocation.
25. In the view of the explanations provided by the Liechtenstein Government, the Authority does not maintain in this reasoned opinion the plea raised in the letter of formal notice regarding the breach of Directive 2004/38/EC in the situations where the spouses no longer have a common residence.
26. This, however, does not alter the Authority's conclusions regarding the breach of Articles 2(2)(a) and 7(2) of Directive 2004/38/EC in the situations where the spouses have initiated divorce proceedings.
27. As regards the issue of whether the residence permit of a third-country national is either automatically revoked in case divorce proceedings have been initiated or may just result in such a revocation, it has to be noted that, for the purposes of the current proceedings, it does not matter that in certain cases the third-country national might

¹¹ See, to this effect, judgment of 30 June 2016, *NA*, C-115/15, EU:C:2016:487, paragraph 47.

retain the residence permit in Liechtenstein after divorce proceedings have been initiated.

28. This is due to the fact that the plea raised by the Authority concerns the issue of whether the derived right of residence of a third-country national family member is at all affected by the initiation of divorce proceedings.

4.2.2 As to the breach of Articles 2(2)(a) and 7(2) of Directive 2004/38/EC

29. As it explains in its reply, the Liechtenstein Government does not agree with the Authority's assessment that by maintaining in force the above mentioned national provisions, Liechtenstein has failed to fulfil the obligations arising from Articles 2(2)(a) and 7(2) of Directive 2004/38/EC.
30. The Authority will proceed further to discuss the arguments advanced by Liechtenstein.

Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR)

31. In Part 2.1 and Part 2.2 of its reply to the letter of formal notice, the Liechtenstein Government claims that spouses can no longer rely on Article 8 of the European Convention on Human Rights (ECHR) and cannot invoke the right to respect for family life covered by Article 8(1) ECHR, as their personal life situation can no longer be considered as constituting "*family life*" in cases where the spouses have jointly initiated divorce proceedings or in cases where one spouse wants to divorce, but the other one does not agree.
32. The Liechtenstein Government argues, therefore, that the fact that a third-country national family member is no longer protected by Article 8 ECHR in the situations mentioned above, must be taken into due consideration when interpreting that family member's derived right of residence in terms of Directive 2004/38/EC. It concludes on this point that "*the level of protection of a third country spouse's right of residence is lowered as that spouse cannot rely anymore on Article 8 ECHR in the situations referred to above*".
33. However, it has to be noted that the concept "*family member*", including the concept of "*spouse*", in Directive 2004/38/EC has an autonomous meaning specific to EEA law¹². Fundamental rights form part of the unwritten principles of EEA law and the provisions of the European Convention of Human Rights and the judgments of the European Court of Human Rights are important sources for determining the scope of the fundamental rights¹³. Nonetheless, the ECHR represents the minimum protection and, therefore, the EEA legislature is not prevented from establishing higher standards of protection than those required under the ECHR.

¹² See opinion of Advocate General Wathelet of 11 January 2018, *Coman and Others*, C-673/16, EU:C:2018:2, paragraphs 34 and 35.

¹³ See, *inter alia*, Case E-2/03 *Ásgeirsson* [2003] EFTA Ct. Rep. 18, paragraph 23, Case E-12/10 *EFTA Surveillance Authority v Iceland* [2011] EFTA Ct. Rep. 117, paragraph 60, and Case E-14/15 *Holship Norge AS*, not yet reported, paragraph 123.

34. Therefore, the Authority definitely cannot agree with the opinion of the Liechtenstein Government that the level of protection of a third-country national spouse's right of residence under Directive 2004/38/EC can be lowered by referring to the ECHR¹⁴.
35. Moreover, the Authority does not share the Liechtenstein Government's interpretation of Article 8 ECHR. First, whilst it has been held, as regards expulsion and extradition measures, that the family had to be limited to the "core family"¹⁵, the European Court of Human Rights generally adopts a broad conception of "family life" characterised by the presence of legal or factual elements pointing to the existence of a close personal relationship, which makes it possible, for example, to include, under certain circumstances, ties between grandparents and grandchildren¹⁶ or ties between brothers and sisters¹⁷. Even *de facto* relationships lacking any blood ties have been regarded as constituting "family life"¹⁸.
36. In addition, through the concept of "private life", Article 8 ECHR can also protect relations which could not have been protected by virtue of the right to family life¹⁹.
37. As regards, in particular, situations relevant to the current infringement proceedings, it is the Authority's understanding, first, that the notion of "family life", as defined by the European Court of Human Rights, must at any rate include the relationship that arises from a lawful and genuine marriage²⁰. Second, once established, family life can be maintained even following divorce²¹. Third, as mentioned before, the notion of "family life" in Article 8 ECHR is not confined solely to families based on marriage and may encompass other *de facto* relationships²². However, when deciding whether such a *de facto* relationship can be said to amount to "family life", a number of factors may be relevant, including whether the couple live together, the length of their relationship *etc.* Therefore, in case of contracted marriages Article 8 ECHR compels the State to abstain from interference at least until the marital relationship is terminated by the competent authorities, regardless of whether personal ties ceased to exist prior to this date²³.
38. Finally, the applicant's family situation, such as the length of the marriage, and other factors expressing the effectiveness of a couple's family life, is one of the relevant criteria to be taken into account by Contracting States in pursuance of their task of maintaining public order and exercising their power to expel an alien convicted of

¹⁴ See also, to this effect, opinion of Advocate General Wathelet of 11 January 2018, *Coman and Others*, C-673/16, EU:C:2018:2, paragraphs 73 and 74 and the case law cited therein.

¹⁵ European Court of Human Rights, *Slivenko v. Latvia*, judgment of 9 October 2003, CE:ECHR:2003:1009JUD004832199, paragraph 94.

¹⁶ European Court of Human Rights, *Marckx v. Belgium*, judgment of 13 June 1979, CE:ECHR:1979:0613JUD000683374, paragraph 45.

¹⁷ European Court of Human Rights, *Moustaquim v. Belgium*, judgment of 18 February 1991, CE:ECHR:1991:0218JUD001231386, paragraph 36.

¹⁸ European Court of Human Rights, *X, Y and Z v. The United Kingdom*, judgment of 22 April 1997, CE:ECHR:1997:0422JUD002183093, paragraph 36.

¹⁹ European Court of Human Rights, *Slivenko v. Latvia*, judgment of 9 October 2003, CE:ECHR:2003:1009JUD004832199, paragraph 97.

²⁰ European Court of Human Rights, *Abdulaziz, Cabales and Balkandali v. The United Kingdom*, judgment of 28 May 1985, CE:ECHR:1985:0528JUD000921480, paragraph 62.

²¹ European Court of Human Rights, *Berrehab v. The Netherlands*, judgment of 21 June 1988, CE:ECHR:1988:0621JUD001073084, paragraph 21.

²² European Court of Human Rights, *X, Y and Z v. The United Kingdom*, judgment of 22 April 1997, CE:ECHR:1997:0422JUD002183093, paragraph 36 and the case law cited therein.

²³ See, *a contrario*, European Court of Human Rights, *Babiarz v. Poland*, judgment of 10 January 2017, CE:ECHR:2017:0110JUD000195510, where the Court confirmed the right of Contracting States to protect a contracted marriage even in cases where one of the spouses applied for a divorce, cohabited with another partner and had a child in this new relationship.

criminal offences, if such a measure can be justified under Article 8(2) ECHR as being “*in accordance with the law*”, as pursuing one or more of the legitimate aims listed therein, and as being “*necessary in a democratic society*” in order to achieve the aim or aims concerned²⁴. However, the effectiveness of a couple’s family life cannot have an effect of removing the married couple from the scope of the protection of Article 8 ECHR whatsoever.

39. Furthermore, the Authority refers to Article 55 of the Marriage Law (*Ehegesetz*²⁵), which requires that spouses, in cases where one spouse does not agree to get divorced, need to live separated for at least three years in order to get a divorce from the national courts. In the Authority’s opinion, this provision clearly underlines the Liechtenstein legislator’s interest to protect the institute of marriage by allowing the spouses to reflect on their marriage, with the intention to allow the spouses to rebuild their relationship and to strengthen their personal ties within this period. The Authority does not see any justified reason why marriages between EEA nationals and third-country nationals and their family life should be accorded less protection by making it more difficult for the spouses to rebuild their relationship.
40. Therefore, and as already explained, even if formal divorce proceedings have been initiated, the third-country national family member of an EEA national who is enjoying the right of residence in Liechtenstein retains the derived right of residence under Article 7(2) of Directive 2004/38/EC as long as the marital relationship has not been terminated by the competent authorities.

Abuse of rights in terms of Article 35 of Directive 2004/38/EC

41. In Part 2.3 of its reply to the letter of formal notice, the Liechtenstein Government expresses the opinion that marriages which are maintained, and not only contracted, for the sole purpose of enjoying the right of free movement and residence under Directive 2004/38/EC amount to marriages of convenience which can be tackled by the EEA States concerned under Article 35 of Directive 2004/38/EC.
42. It has to be noted that EEA States may investigate individual cases where an abuse of residence rights is suspected. However, such investigations must be limited to cases where there is a well-founded suspicion of abuse. Moreover, any measure taken by an EEA State to refuse, terminate or withdraw any right conferred by Directive 2004/38/EC in the case of abuse of rights or fraud, such as marriages of convenience, must be proportionate and subject to the procedural safeguards provided for in Articles 30 and 31 of Directive 2004/38/EC.
43. However, in the Authority’s view, it is apparent from the wording, context and objective of Article 35 of Directive 2004/38/EC that, in order to amount to a marriage of convenience, the respective marriage needs to be contracted for the sole purpose of enjoying the right of free movement and residence under Directive 2004/38/EC. Therefore, in the Authority’s opinion, and as also confirmed by the Commission’s Staff Working Document²⁶ accompanying the Handbook on addressing the issue of

²⁴ European Court of Human Rights, *Salem v. Denmark*, judgment of 1 December 2016, CE:ECHR:2016:1201JUD007703611, paragraph 64.

²⁵ *Ehegesetz vom 13. Dezember 1973*, EheG, LR 212.10, as last amended.

²⁶ Commission Staff Working Document - Handbook on addressing the issue of alleged marriages of convenience between EU citizens and non-EU nationals in the context of EU law on free movement of EU citizens (SWD(2014) 284 final), pages 8 and 9.

alleged marriages of convenience²⁷, even marriages which started off as genuine marriages but are later maintained for the sole purpose of continuing to confer on the third-country national a right of residence, cannot be considered as marriages of convenience.

Whether the Liechtenstein national provisions can be maintained taking into account the combined effect of the scope of the right to family life under Article 8 ECHR and Article 35 of Directive 2004/38/EC

44. In Part 2.4. of its reply to the letter of formal notice, the Liechtenstein Government further claims that in cases where the guarantee of the right to respect for family life in terms of Article 8 ECHR is, at least, questionable and where, in addition, abuse in terms of Article 35 of Directive 2004/38/EC is suspected, the EEA State concerned must undoubtedly have the right to review a third-country national's derived right of residence.
45. In this regard, the Authority refers to its assessment in paragraphs 31-43 above to stress again that, according to Directive 2004/38/EC, interpreted in light of Article 8 ECHR, the family life of EEA nationals and their third-country national spouses cannot be exposed to the measures discussed in this reasoned opinion undertaken by Liechtenstein in case divorce proceedings have been initiated.

FOR THESE REASONS,

THE EFTA SURVEILLANCE AUTHORITY,

pursuant to the first paragraph of Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice, and after having given Liechtenstein the opportunity of submitting its observations,

HEREBY DELIVERS THE FOLLOWING REASONED OPINION

that by maintaining in force national provisions under which third-country national family members of EEA nationals are no longer considered as fulfilling the conditions for the granting of a residence permit and their permits are revoked in the situations where the spouses have initiated divorce proceedings and where the EEA nationals at issue are still enjoying their rights of residence in Liechtenstein, such as Articles 40 and 52(1)(b) of the Act of 20 November 2009 on the right of EEA and Swiss citizens to free movement and residence, Liechtenstein has failed to fulfil its obligations arising from Articles 2(2)(a) and 7(2) of the Act referred to at point 3 of Annex VIII to the EEA Agreement (*Directive 2004/38/EC of the European Parliament and of the Council of 29 April 2004 on the right of citizens of the Union and their family members to move and reside freely within the territory of the Member States amending Regulation (EEC) No 1612/68 and repealing Directives 64/221/EEC, 68/360/EEC, 72/194/EEC, 73/148/EEC, 75/34/EEC, 75/35/EEC, 90/364/EEC, 90/365/EEC and 93/96/EEC*), as adapted to the EEA Agreement by Protocol 1 thereto.

²⁷ Communication from the Commission to the European Parliament and the Council – Helping national authorities fight abuses of the right to free movement: Handbook on addressing the issue of alleged marriages of convenience between EU citizens and non-EU nationals in the context of EU law on free movement of EU citizens (COM(2014) 604 final).

Pursuant to the second paragraph of Article 31 of the Agreement between the EFTA States on the Establishment of a Surveillance Authority and a Court of Justice, the EFTA Surveillance Authority requires Liechtenstein to take the measures necessary to comply with this reasoned opinion within *two months* of its receipt.

Done at Brussels, 7 March 2018

For the EFTA Surveillance Authority,

Bente Angell-Hansen
President

Frank J. Büchel
Responsible College Member

Högni Kristjánsson
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This document has been electronically authenticated by Bente Angell-Hansen, Carsten Zatschler.