

2023 BUSINESS PLAN







Craig Swan
Chief Executive Officer

Chief Executive Officer Message

Every so often, an organisation has the opportunity to dare to race forward. It is a race to fulfil its mission and vision in new and heightened ways. Yet, as a regulator in an industry that is fast-evolving and uniquely impacted by the farthest-reaching externalities (from currency to—especially in Bermuda’s case—the weather), this opportunity has become a steady state rather than a passing phase. Seizing it means, alongside dependably delivering long-term objectives and multi-year phased projects, incrementally and seismically elevating how you deliver. The Bermuda Monetary Authority (Authority or BMA) has chosen this as its path.

Therefore, the BMA’s 2023 Business Plan is a roadmap for fine-tuning our efficiency and efficacy. It lays out the innovative elements we will mine to continue the positioning of the BMA’s regulatory and supervisory framework and operations as standard-setting. In the language of game theory, thoughtful and purposeful enhancements to our approach change the ‘game’ being played to enhance our outcomes demonstrably. When distilled, this is the BMA’s 2023 strategy—a systematic practice of innovation in our approach to our people, framework and process.

The BMA boasts a sharp, dynamic and adaptable workforce. Maintaining high-calibre people requires innovative approaches to hone our innovators’ skills. In 2023, the BMA will use a combination of tools already in our arsenal, ones that we develop in-house and others

that we acquire through a combination of traditional and non-traditional resourcing models and programmes. The specific programmes we intend to enhance or deliver range the innovation skill spectrum, from staff engagement tools, talent management programmes and learning and development opportunities to people-friendly policies, wellness programming and a Diversity, Equity and Inclusion (DEI) initiative.

Additionally, the BMA intends to mirror internally the same Environmental, Social and Governance (ESG) sentiment it prioritises externally. The 2023 ESG objective is to define what ESG means for the BMA at the operational level and continue developing and embedding an ESG and sustainability model for the organisation.

While the BMA has long incorporated sustainable operational approaches, we now want to measure, monitor and continue improving, setting enhanced standards and thoughtful protocols that may behave as a precursor to the standards we set for our registrants. This is where innovation from our people multiplies into innovation in our framework.

Regarding the BMA’s framework in 2023, innovation will take the form of further implementing supervisory approaches and regulatory frameworks that are fit for purpose, maintain financial stability and afford adequate protection for customers while also facilitating a more diversified financial services sector and enabling solutions for global challenges. One such challenge

is addressing the climate change protection gap. The Bermuda insurance industry is no stranger to this. While catastrophe insurance capacity is shrinking and new and additional cover and higher policy limits are needed, Bermuda's (re)insurers are stepping in. The Association of Bermuda Insurers and Reinsurers (ABIR) reported that its members experienced a 21% year-on-year increase in net premiums written in 2021.¹ These are the types of positive contributions the BMA wants to further foster in 2023 by leveraging and, where necessary, updating the insurance and investment funds frameworks to facilitate responsible solutions and products that address the impact of climate change and lower the protection gap.

In concert with this, the BMA aims to integrate ESG requirements and standards across all sectors, as well as to continue to establish appropriate regulatory and supervisory frameworks and related guidance for ESG in investment funds and insurance (i.e., state-of-the-art and tailored frameworks that reflect climate change in risk management, stress testing, governance and public disclosures).

The BMA's footprint in emerging arenas and new frontiers extends well beyond ESG and crosses sectoral lines.

While the conduct of business is not a new concept, it is a newly added principal object within the Bermuda Monetary Authority Act 1969, expanding the BMA's mandate and bringing conduct into regulatory scope. Building on the BMA's conduct of business work completed in 2022, we will enhance the digital asset business and investment business sectoral codes; expand domestic consumer education content; integrate data requirements into existing prudential data submission processes; and promote knowledge sharing and training between the BMA and industry on this topic. While we will not be reinventing the wheel, we intend to approach this new remit with fresh eyes and an innovative mind-set to prioritise the sensitive balance between prudence and pragmatism on which we pride ourselves.

Another emerging arena is Decentralised Finance (DeFi) and other aspects of Financial Technology (FinTech). As these products and services come to the fore, the BMA understands their value in addressing global challenges, particularly increasing financial inclusion. Therefore, 2023 will also be a year where the BMA continues developing and enhancing our framework to ensure entities have the proper parameters and guidance to pursue innovative offerings. This will include evaluating

the operational, legal and technological feasibility of piloting embedded supervision surrounding DeFi.

In the same vein, just as technology is a welcome participant in financial services, it can also be an interloper. Over the next year, we will maintain our commitment to operational resilience supervision, including that financial entities are appropriately accounting for cyber and cloud risks and other vulnerabilities across all sectors.

Alongside these newer initiatives, the BMA will maintain its focus on its traditional remits across the traditional sectors. In 2023, we plan to draft a clear multi-year roadmap addressing the orderly resolution of entities in the banking sector. Regarding investment business, the BMA will embed the Investment Business Act 2003 amendments made in 2022 and assess whether further updates are required.

The BMA understands that these consistent, thoughtfully created, introduced and integrated framework upgrades maintain agility in our work as supervisors and in industry's work in evolving to meet challenges and demands with the right product or service at the right moment. This is when the BMA's innovative framework shines. It maintains stability and provides various sophisticated routes for companies to effectively manage their risk, allowing entities to proactively and prudently shift when needed.

Such framework enhancements have a harbinger—innovation in our processes and, more specifically, in our use of technology. Committed innovators use the right technology (according to one study, twice as often as their less innovative peers).² In 2023, to maintain this commitment, the BMA will continue to effectively harness technology to streamline processes and augment staff's ability to produce high-quality work. This will include enhancing our Supervisory Technology (SupTech) tool, greater use of automation and enhanced data analysis, and further progression in the execution of IT Strategy: Vision 2025.

The 2023 Business Plan is dedicated to converging innovation across the BMA's building blocks of people and processes. The goals, objectives and initiatives we have set for ourselves this year bridge these aspects of our organisation and will allow the BMA to find new and better pathways for enhancing a regime that fulfils our mission, vision and mandate.



Craig Swan
Chief Executive Officer

¹ <https://www.royalgazette.com/re-insurance/business/article/20220901/member-companies-of-the-association-of-bermuda-insurers-and-reinsurers-recorded-a-robust-21-per-cent/>

² McKinsey 2021 Eight Essentials of Innovation Survey

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Insurance

The Supervision (Insurance) Department, together with the Actuarial Department, regulates, supervises and inspects Bermuda's insurance companies and intermediaries. Through this role, in 2023, they will progress several initiatives and multi-year deliverables to enhance the Authority's regulatory and supervisory framework. Simultaneous to this will be the department's priorities of policyholder protection and alignment with regulatory developments at the international level. These priorities and initiatives include but are not limited to:

- Reviewing certain targeted parts of Bermuda's regulatory framework to reflect emerging risks as the insurance industry and market continue to evolve. The review and resulting regulatory and supervisory framework enhancement will be aimed at ensuring that the BMA's regime responds to market changes and regulatory developments at the international level and is fit for purpose for the Bermuda market
- Continuing to transpose the Common Framework for Internationally Active Insurance Groups (IAIG) and Holistic Framework for Systemic Risk into the Bermuda commercial regulatory regime. Regarding the latter, the Authority will continue its work on recovery plans for insurers (particularly for IAIGs, large domestic insurers and insurance groups). This work will continue to be guided by international developments, including work done at the International Association of Insurance Supervisors (IAIS) level (of which the BMA is an active participant in a number of Committees, Working Groups and Tasks Forces)
- Continue the integration of key ESG considerations, particularly climate change, into the regulatory framework, considering risks, opportunities and innovation. The Authority will:
 - Monitor the implementation of comprehensive guidance on the governance aspects of climate change
 - Finalise guidance on climate risk financial disclosures
 - Continuously assess the insurance and investment fund sectors' frameworks for necessary adjustments needed in the context of innovation (e.g., green finance)
- Consulting and providing related guidance on the integration of recent significant insurance accounting developments to the Authority's regulatory reporting framework, namely International Financial Reporting Standard 17 Insurance Contracts and the United

States Generally Accepted Accounting Principles long-duration targeted improvements

- Implementing the conduct of business supervision framework to enhance customer protection and supporting implementation efforts by insurers on other recent revisions to the Insurance Code of Conduct
- Leveraging technology to develop further integrated and insightful regulatory applications, enhancing all aspects of the supervisory cycle
- Providing oversight of the insurance-linked securities market through company-specific supervision, review of annual and ad hoc data requirements, and various market engagements to ensure the framework remains appropriate to address existing and emerging risks

Additionally, the Authority's day-to-day supervisory activities allow us to monitor insurers' capitalisation and liquidity levels in place to support their risks. These will include risk-based on-site inspections, qualitative and quantitative off-site reviews/analyses, thematic reviews and supervisory colleges.

The BMA will publish the following thematic, insurance-related thought leadership materials in 2023:

- Alternative Capital Report
- Captive Report
- Catastrophe Risk in Bermuda Report
- Cyber reports (operational resilience and cyber underwriting)

Finally, international engagements with key stakeholders remain a crucial 2023 priority. Accordingly, the Authority will continue to:

- Actively participate in international standard-setting bodies, especially the IAIS
- Prioritise collaboration with the IAIS Caribbean and Offshore Region, the Group of International Insurance Centre Supervisors and the Caribbean Association of Insurance Regulators
- Have a constructive dialogue with regulatory colleagues representing various domiciles, including regular bilateral meetings with the National Association of Insurance Commissioners, EIOPA and other financial services, regulatory and supervisory institutions

- Interactively develop and maintain relationships with foreign jurisdictions by sharing views and experiences on matters of common interest

Policy Development

In 2023, the Policy Development Department will continue to provide guidance and develop policy, supporting the BMA in achieving its key strategic initiatives and corporate objectives by working closely with the relevant supervisory teams. This collaboration allows the BMA to maintain and enhance regulatory and legislative frameworks through subject matter expertise, ensuring alignment with international standards and the creation of appropriate legislative and regulatory instruments that balance prudence and pragmatism while fostering innovation in financial services' emerging niches.

The 2023 policy initiatives include, among others:

- Continuing the establishment of relevant sectoral conduct of business frameworks, with a particular focus on the investment business sector
- Continuing to embed the requirements from the IAIS Common Framework for the Supervision of IAIGs into the insurance framework
- Supporting the development of the banking and investment business sectors through framework enhancements that align with international standards

Digital Asset Business

As the digital asset business industry matures, its long-term growth exhibits increased prudence. New business models continue to develop and gain sophistication, especially regarding DeFi, stablecoins, and digital asset lending and borrowing. In collaboration with local and international stakeholders, the BMA will proactively adjust its regulatory framework to support the prudent development of this sector in Bermuda and minimise risks of external shock. To this end, the following objectives are the BMA's 2023 focus areas:

- Minimise non-compliance risks by maintaining robust data-driven supervision
- Revise the existing sandbox supervisory approach to enhance scalable, prudent oversight
- Endeavour to ensure that FinTech-related legislative and regulatory frameworks remain fit for purpose

to maintain the Bermuda regime's reputation and promote sustainable growth in the ecosystem

- Develop guidance to support appropriate net asset valuations
- Continue to collaborate actively with stakeholders through participation in the Global Financial Innovation Network's Coordination Group, and further dialogue with other regulatory partners and the recently established industry forum in Bermuda
- Launch a consumer education initiative highlighting digital assets' risks and opportunities and the importance of dealing with regulated financial institutions
- Evaluate the operational, legal and technological feasibility of piloting embedded supervision in the DeFi context

Investment Funds

The Authority continues to progress initiatives that allow us to meet our overarching mandate which is to protect investors and maintain the credibility of the jurisdiction. The most notable milestone in 2022 was the roll out of the INTEGRA® solution to the funds sector in March 2022. The investment in our infrastructure has not only increased our operational efficiency, but it has also expanded the Authority's supervisory capabilities.

Looking forward to 2023, the Authority will leverage the improvements in the data collection that have been achieved with the roll out of INTEGRA® as we undertake a review of the Investment Funds Act 2006 in order to identify opportunities to further strengthen our funds regime.

Anti-Money Laundering/Anti-Terrorist Financing

The BMA's Supervision Department performs core risk-based supervisory oversight responsibilities, comprising the on-site inspection programme, selected thematic reviews, and close monitoring of relevant sectors and specific regulated financial institutions.

To support this work, the department harnesses the data obtained during the annual data calls, supplemented by the results of the supervision programme. In 2023, to refine the approach, it will continue to focus on increasing its supervisory effectiveness by actively innovating in its

Anti-Money Laundering/Anti-Terrorist Financing (Continued)

data collection, analysis and presentation and enhancing internal efficiencies, particularly opportunities related to further automation of routine processes.

Additionally, through the BMA's role in Bermuda's National Anti-Money Laundering Committee (NAMLC), the Authority will continue to collaborate with NAMLC members to achieve key national priorities. One key priority is to conclude the Caribbean Financial Action Task Force's mutual evaluation follow-up process by executing and documenting the actions required to address all recommendations from the Mutual Evaluation Report published in January 2020. The BMA will also support the continued execution and communication of National Risk Assessments, particularly the inaugural risk assessment of digital assets and the digital asset business sector.

The BMA will continue to design, develop and deploy industry outreach, ensuring that each financial sector under its AML/ATF supervision understands the evolving key threats and vulnerabilities pertinent to them so that individual institutions reflect the relevant findings in their AML/ATF programmes. The Supervision (AML/ATF) Department will also support other national initiatives, such as assisting with ongoing gap analyses and legislative updates to ensure the regime remains current with changing international standards, enhancing the

jurisdiction's capabilities to identify and mitigate potential proliferation financing risks.

Financial Stability and Research

In 2022, the Authority will continue pursuing its goal of promoting financial stability. As in years past, this will include expanding the Authority's macroprudential surveillance framework, strengthening Bermuda's recovery and resolution tools and contributing to domestic and international financial stability efforts.

Regarding macroprudential surveillance, the Authority will continue its financial sector and macroeconomic monitoring geared towards early identification of potential build-up of systemic risks. Further, the BMA will proactively work with relevant stakeholders, including microprudential supervisors in insurance, banking and digital asset business, to prevent, mitigate and manage these potential risks.

Concerning recovery and resolution, the BMA will build upon the work completed on recovery planning and progress toward resolution planning in the insurance sector. Regarding the banking sector, it will focus on strengthening sectoral resilience.

Conduct

The Conduct Regulation Department will continue to execute its plan to operationalise the conduct of business regime in 2023.

The Authority will commence its programme of assessing compliance with the banking and insurance codes of conduct as part of its on-site inspections and off-site surveillance of affected licensed institutions following the transition period in the first quarter of 2023. Additionally, the Conduct Regulation Department will complete further work throughout the year to establish initial data calls related to conduct, which will be submitted in early 2024.

Furthermore, commensurate with banking fee regulations coming into force, the Authority will commence its supervision of such regulations during 2023.

The phased implementation of conduct obligations by sector will continue with the digital asset business and investment business sectors. The goal is to publish enhanced sectoral codes incorporating conduct matters, following appropriate consultation. Supervision will commence following a transition period for each sector.

To continue contributing to domestic and international financial stability efforts, the BMA will continue to engage with stakeholders. Domestically, this includes remaining actively involved in Bermuda's Financial Policy Council, chaired by the Minister of Finance. The Authority will also maintain an ongoing dialogue with credit rating agencies regarding credit ratings of the Bermuda Government and Bermuda-based financial services firms.

At an international level, the BMA will continue participating in the IAIS Macroprudential Committee and the Macroprudential Monitoring, Macroprudential Supervision and Resolution Working Groups. The BMA will also continue its involvement in the IAIS implementation efforts on the holistic framework to assess and mitigate systemic risk in the insurance sector. Finally, the BMA will remain active in the Financial Stability Board Regional Consultative Group for the Americas and the Organisation for Economic Co-operation and Development's Insurance and Private Pensions Committee.

Specific to research, the Authority will continue generating research-based knowledge and innovation that will inform decisions on policy development and financial stability matters.

Data Science and Artificial Intelligence

The Authority will continue to build on its digital transformation plan to improve decision-making capabilities and agile execution through data and analytics throughout 2023. This work aims to create a composable organisation with intelligent systems that augment decision-making capabilities, enhance insights and promote efficiency through automation. The technologies include:

- SupTech – Continued deployment and facilitating the adoption of SupTech based on data science that provides a resilient and robust service delivery and enables augmented decision-making through machine learning and artificial intelligence applications and an open data architecture
- Regulatory Technology (RegTech) – Developing RegTech applications that provide efficiency and effectiveness while enhancing the experience of the BMA's internal and external stakeholders, including freeing resources through hyper-automation

To accomplish this in 2023, the BMA's Data Science and Artificial Intelligence Department will focus on:

- Developing the Centre of Excellence for Data Engineering, Data Science and Advanced Analytics. This will be done by nurturing and mentoring citizen data scientists for the supervisory units in relays

- Supporting and augmenting complex decisions through advanced data analytics and automating simple decisions across supervisory functions
- Developing Data-as-a-Service technology with supporting infrastructure for data acquisition, manipulation and transformation, a unified view of data assets and data sharing capabilities enterprise-wide, thus facilitating borderless supervision
- Piloting a RegTech solution via a BMA/industry sandbox, engaging with industry to develop a RegTech solution that will facilitate the collection of data assets while gaining efficiencies in transforming and analysing the data (i.e., reducing the cost of regulatory compliance)
- Deploying natural language processing for text summarisation and sentiment analysis

Enterprise Risk Management

As the BMA advances, it understands that the ever-increasing speed of change has created a need for enhanced capabilities in identifying emerging risks and creating robust mitigation measures. Underpinning this is its Enterprise Risk Management (ERM) framework to ensure it is well prepared to manage and transform these risks into opportunities.

To accomplish this in 2023, the BMA will continue to evolve its ERM framework to enhance its ability to pinpoint and respond. The BMA ERM office's collaboration across departments will further embed risk management best practices into the organisation's decisions and processes, including:

- Expediting the BMA's technology-enabled ERM capabilities to enhance risk-based decision-making and create efficient risk monitoring and reporting
- Continuing to operationalise and embed the BMA's enterprise risk appetite in the Authority's decision-making processes
- Sustaining implementation of ERM training to enhance the BMA's horizon-scanning abilities
- Continuing to improve and roll out ERM tools, such as risk registers and risk reporting templates
- Strengthening collaboration with relevant domestic stakeholders regarding transversal risks that impact the BMA and the jurisdiction at large



Banking, Trust, Corporate Services and Investment

As the BMA's department responsible for the prudential supervision of firms licensed in the Banking, Trust, Corporate Services, and Investment (BTCSI) sectors, the Supervision (BTCSI) Department will continue enhancing the relevant regulatory frameworks to facilitate the introduction of conduct supervision and new prudential regulations in line with international standards and in response to changing business models and digital initiatives.

Further, the department will continue implementing the Operational Cyber Risk Management Code of Conduct for Corporate Service Providers, Trust Companies, Money Service Businesses, Investment Businesses and Fund Administration Providers, Banks and Deposit Companies.

Banking

In 2023, the Authority will work with Government and consult as required on revised legislation to enhance the Bermuda banking sector's regulatory framework. Additionally, the Authority will continue implementing the Banks and Deposit Companies Code of Conduct and the revised prudential requirements in line with the Basel III international standards.

Trust and Corporate Service Providers

Following the 2021 assessment of Bermuda's compliance with the trust and corporate service provider standards—as promulgated by the Group of International Financial Centre Supervisors (GIFCS) and the publication

of the final peer evaluation report on Bermuda—the BMA will consult on legislative and other amendments to further enhance compliance with the GIFCS principles.

Investment Business

Throughout 2023, the Authority will continue implementing the revised Investment Business Act 2003 (IBA), including monitoring entities' compliance with transitional provisions, ahead of the 12-month transition period's close on 26 July 2023. The Authority will also consult on proposals relating to the review of Part IV of the IBA.



Operations

The BMA's operational units offer the critical mass of back-office support and expertise for the organisation to remain sustainable and achieve its corporate goals. In 2023, they will provide the precursory groundwork needed across all key strategic initiatives, serving as a source of connectivity and synergy that amplify the Authority's outcomes.


People

Enhancing Human Resources (HR) systems, progressing the Authority's DEI strategy and workforce planning are the focal points for this year's BMA people strategy.

The Authority will review its HR systems, which support performance management, continued development and HR analytics. The goal is to update and enhance the system to continue to support staff in effectively executing their core functions and position the Authority to respond to an increasingly demanding and competitive environment. The focus on continued development addresses the Authority's plans for incorporating further incremental enhancements in its core development and leadership programmes. These programmes underpin continued upskilling and technical advancement across the BMA's workforce, particularly leadership development

and technical competencies. Additionally, continual enhancement of HR analytics is central to the organisation's ability to accurately interpret and anticipate market movements that, in turn, directly impact the BMA's ability to respond, prepare and prioritise.

With the restrictions of the pandemic now behind us, the Authority formally reinstated its commitment to philanthropy in 2022 by participating in its first annual Community Day. The intention materialised from the BMA's 50th Anniversary community efforts, which were unfortunately paused due to the pandemic. The BMA will continue engaging and working alongside local charities in 2023, with an annual event dedicated to giving back to the local community.



Technology

The continued implementation and deployment of INTEGRA®—the Authority’s custom-developed application to enhance the business processes associated with the financial supervision life cycle—remains a key initiative in the BMA’s *IT Strategy: Vision 2025* roadmap.

While the Authority undertook a digital transformation several years ago, the pandemic accelerated this process. To this end, the BMA successfully deployed a next-generation intranet platform and commenced Phase I of its internal Electronic Records and Information Management (ERIM) solution. The ERIM solution will provide the BMA with increasingly intuitive and secure access to complete information—anytime, anywhere, on any device. This will facilitate more responsive and meaningful interactions with registrants.

Other key initiatives of *IT Strategy: Vision 2025* that remain a top priority for the BMA include data security and management strategies to develop an enterprise data warehouse for advanced data analytics via business intelligence, artificial intelligence and machine learning.

Communications and Public Relations

Each year, the BMA’s communication strategy is divided into internal and external initiatives. Internally, the Communications and Public Relations Department serves as a hub for all organisation-wide communications to create clear, consistent messaging. Externally, the department operates as the BMA’s communication gatekeeper.

To fulfil these roles in 2023, the department will continue to:

- Set the organisation’s communications strategy to align and support the corporate goals and key strategic initiatives, such as industry publications, external speaking events, and internal initiatives and dissemination of essential information to external stakeholders
- Manage the BMA’s reputation by demonstrating its commitment to its mission, the public, social responsibility and corporate identity through communicating the BMA’s philanthropic commitment, thought leadership position and value proposition as a leading financial services regulator
- Strengthen the organisation’s connectivity by drafting, editing and distributing internal communications from departments, committees

and leadership to the broader BMA staff via steering committees and working groups to provide expertise and develop a communications plan for each respective project or initiative

- Expand upon the BMA’s communication channels through digital and analogue mediums, using communications best practices and unified branding, providing external stakeholders with information about the BMA and its frameworks

Project Management

The primary mandate of the BMA’s Project Management Office (PMO) is to streamline and scale consistent programmes and project management cross-organisationally. In 2023 it will continue providing this function through managing all BMA change initiatives and tracking project statuses with a focus on creating one clear, consistent, comprehensive view of the BMA’s projects and change objectives.

To achieve this, the PMO will continue to:

- Deploy the organisation’s project portfolio management tool to manage projects and resources
- Provide expert guidance, support and oversight of the project portfolio, particularly in aligning resources and corporate objectives
- Enrich the BMA’s project initiation, delivery and governance practices
- Supply increased and enhanced analyses of projects’ key performance indicators, including return on investment and benefits realisation

Bermuda Currency

As part of its mandate to monitor advances in currency security to ensure Bermuda’s notes and coins continue to be readily accepted and not easily counterfeited, the BMA will introduce polymer banknotes in late 2023 or early 2024.

The BMA will continue its advertising campaign to remind the public that the call in period for legacy banknotes will end on 31 December 2023.

Cyber Risk

The BMA's 2023 cyber risk strategy revolves around fostering cyber risk resilience in Bermuda's financial institutions and safeguarding customers' interests. To accomplish this, the Cyber Risk Department will continue:

- Implementing the cyber supervisory programme, including on-site and off-site inspections, yearly returns' analysis and cyber risk assessments for new licensing authorisations
- Pursuing incident notifications and subsequent root cause report analysis
- Bolstering and harmonising regulation and proportionately deploying and aligning the supervisory cyber risk approach across sectors
- Directing regulatory provisions and industry cyber best practices via engagement with regulated entities
- Reinforcing cybersecurity training for BMA supervisors to foster in-house cyber expertise
- Harnessing the Cyber Risk Department's subject matter expertise on technological advances, benefits and risks

Legal Services and Enforcement

In 2023, the Legal Services and Enforcement Department aims to conclude its work with the Ministry of Finance and the Ministry of Legal Affairs and Constitutional Reform on the proposed amendments to the appeal regime. Once enacted and in force, these amendments will allow Bermuda's Supreme Court to hear any appeal of the BMA's enforcement decisions.

Thereafter, the BMA will promptly publish revisions to the Statement of Principles and Guidance on the Exercise of Enforcement Powers and conduct outreach sessions regarding the operation of these revisions.

The BMA will continue to protect the interests of members of the public through robust reporting of concluded enforcement actions taken against regulated entities. Additionally, the BMA will continue its robust

'policing the perimeter' investigations to ensure that all relevant entities established or operating in or from within Bermuda are not conducting regulated activity without being appropriately registered or licensed by the BMA.

Corporate Authorisations

The Corporate Authorisations Department is responsible for beneficial ownership and control, vetting new businesses seeking to establish Bermuda operations and overseeing the transfer and issuance of shares. The BMA's 2023 approach to the discharge of these responsibilities will include the following:

- Beneficial ownership — continuing to work with the Registrar of Companies to support the Beneficial Ownership Task Force, helping to ensure the successful implementation of the public register for Bermuda's beneficial ownership regime. Additionally, the Authority will remain engaged with industry regarding the beneficial ownership regime
- Vetting — continuing to support the prudential aspects of the Authority's work by refining the focus on vetting shareholder controllers of regulated financial institutions in Bermuda. The BMA will also maintain its focus on enhancing and strengthening industry users of the INTEGRA[®] system by providing additional training and training tools to system users. It will issue more regularly updated revisions to its Frequently Asked Questions Guide to assist with making submissions on the INTEGRA[®] system
- Transfer and issuance of shares — continuing to monitor and execute its responsibilities under the exchange control regime to ensure compliance with relevant aspects of the regime. This will include commencing exchange control enforcement in fulfilment of the Authority's international obligations

Community Matters

In 2018, the BMA revamped its philanthropic activity model in preparation for its 50th anniversary. While the organisation successfully debuted the model's first iteration in 2019, due to the pandemic, the next three years of charitable activity were cultivated via mostly virtual means. In 2023, the BMA will transition back to its original model.

This is a constant model, creating corporate citizenship opportunities for staff when, where and how they are available. In some cases, this will be through dedicated, hands-on hours. In other cases, staff can serve as charitable ambassadors simultaneous to their daily professional activities. Whether through time, money or expertise, the BMA will develop avenues for its people to contribute to the broader community.



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