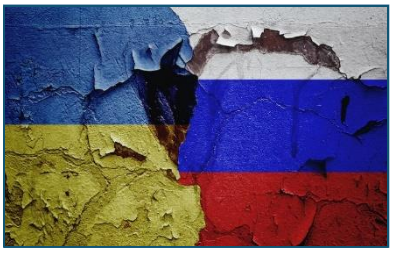
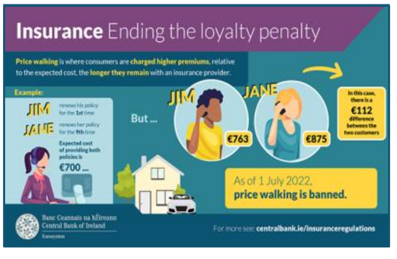
Banc Ceannais na hÉireann
Central Bank of Ireland
Eurosystem

Insurance Newsletter

MARCH 2022





Crisis in Ukraine – Our Expectations of Firms

While the humanitarian aspects of the tragic events that have been unfolding in Ukraine are foremost in our minds, we also have to be mindful of the ramifications of the crisis on the economy, the financial system in general and the (re)insurance industry in particular.

In this article, we highlight some of the issues that (re)insurers will no doubt already be considering as they navigate their way through the heightened uncertainty and volatility that the crisis has triggered. This includes the practicalities of complying with relevant sanctions and protecting themselves against non-financial risks, notably cyber related, as well as any potential criminal liability for a breach of an EU sanctions measure.

Financial sanctions

The EU has adopted various restrictive measures (sanctions) in response to the crisis. We have a dedicated webpage where supervised entities can access details and resources relating to the financial sanctions adopted. All natural and legal persons must comply with EU Regulations relating to financial sanctions as soon as they are adopted. A "Dear CEO" communication from the Head of Insurance Supervision was issued to (re)insurers on 28 February 2022, reminding firms that they must have processes in place to operationalise the sanctions as they relate to their business activities. It also highlighted the need for firms to monitor the situation closely given the potential for further sanctions.

Exposure to Russia, Ukraine and Belarus

The Bank expects that all firms will, by now, have undertaken at least a preliminary assessment of their direct and indirect exposures to Russia, Ukraine and Belarus, in particular in respect of their investments

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BACKGROUND

Solvency II data allows us to identify Irish (re)insurers' direct exposure to Russia, Ukraine and Belarus in terms of assets, gross written premiums and technical provisions. For example, Russia, Ukraine and Belarus accounted for around €100m of (re)insurers' investments at the end of 2021, equating to 0.02% of their total investments.

However, adding indirect investment exposure via investment fund holdings on a look-through basis brings that total to over €600m. The majority of indirect exposure via investment funds is in respect of unit-linked business. Firms may also, of course, be invested in corporations or entities that themselves are engaged in activities in the region.

From an underwriting risk perspective, Solvency II data shows that those policies or treaties that are linked to Russia, Ukraine or Belarus typically relate to speciality lines of business, for example, marine, aviation and transport, and credit and suretyship insurance. There may also be, of course, insurance underwriting exposure through policies/treaties issued to policyholders/cedants in other countries but covering risks and perils situated in, or emanating from, the region.

It should be remembered that a firm's own potential claims exposure in current circumstances may be much higher than a historical technical provisions figure suggests.

Although the majority of (re)insurers have limited direct business or investment exposure to Russia, Ukraine and Belarus, all will potentially face the secondary effects of the conflict on economic and financial market conditions, both in Ireland and globally, for example on bond, equity and property price volatility, inflation rates, interest rates and economic growth.

(including via investment funds and other entities), liabilities and counterparties.

Unit-linked providers may have already faced the possibility of fund management companies taking action on underlying investments funds that have exposure to the region. This could be due to the potential for impaired valuations, for example: stale pricing; unavailability of prices; or prices which are objectively not reliable. It may involve the suspension of an underlying investment fund, which could flow through to action being required in respect of a unit-linked fund. In such cases, the insurer will need to have regard to the fair treatment of the affected customers and the relevant policy terms and conditions.

(Re)insurers with underwriting exposure to the region will need to consider the impact of the sanctions regime and policy terms and conditions (for example, definitions and exclusion clauses) to quantify their potential financial exposures, together with the provisions of any relevant reinsurance/retrocession arrangements they have in place. In addition, firms with underwriting exposure to sanctioned persons, entities or bodies will have to assess the impact of the relevant sanctions regime(s).

Cyber risks

The conflict in Ukraine has increased cyber security risks for businesses across the world. The Bank expects firms to be on heightened alert for cyber-attack, to have measures in place to detect, defend and recover as needed, and protect and ensure continuity of their operations. Firms should assess their exposure to cyber risks, including indirect exposures via third parties, and keep a watching brief for advisories from the National Cyber Security Centre.

Furthermore, potential cyber underwriting risk exposures should also remain under scrutiny in light of the current situation. Occurrence of a large-scale cyber-attack could give rise to uncertainty around the extent of insurance policy coverage (as was the case with regard to COVID-19 and business interruption insurance cover).

SANCTIONS

In the event that a match or a "hit" occurs against a sanctioned person, entity or body, firms must immediately freeze the account and/or stop the transaction and report the hit to the Central Bank of Ireland along with other relevant information. The Sanctions Return Form is available on the Central Bank's website and should be submitted by email to sanctions@centralbank.ie.

All natural and legal persons must supply any information related to suspected financial sanctions breaches to the Central Bank pursuant to the relevant EU Council Regulations. The penalties in Irish law for a breach of EU financial sanctions are contained in Irish Statutory Instruments. A list of Irish statutory instruments in force relating to penalties for the breach of financial sanctions can be found by referring to the Irish Statute Book website.

The relevant section of our website is: https://www.centralbank.ie/regulation/how-we-regulate/international-financial-sanctions

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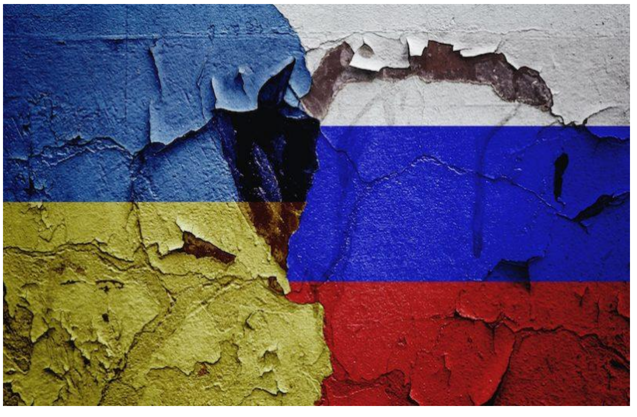
Insurers were reminded in our December 2020 Insurance Newsletter of the importance of ensuring clear and unambiguous policy definitions of the risks covered and the consistent use of terminology, to provide clarity for policyholders.



Economic and financial market implications

Our Financial Stability Review 2021 II highlighted a range of risks faced by (re)insurers. These included the risks posed by stretched asset valuations, potential exogenous economic shocks, inflationary pressures and the general financial and operational risks associated with an increasingly volatile, uncertain, complex and ambiguous world. The Ukraine conflict has served to trigger or exacerbate these risks, and firms will clearly need to assess the impact of the evolving situation on both their solvency and liquidity positions.

Firms need to ensure that they have up-to-date data available to enable them to monitor their key financial metrics closely and a responsive own risk and solvency assessment process. They should have appropriate stress and scenario testing in place to assist with their assessment of the possible impact of the crisis on their financial position, including solvency and liquidity. This should take into account the potential conflation of risks, and firms have to be agile enough to update their analysis as the situation evolves and more information becomes available.

At times of heightened uncertainty, understanding any counterparty vulnerabilities is more important than ever. This includes material intra-group financial linkages, such as reinsurance, lending or "cash pooling" arrangements, and firms should monitor the potential for elevated concentration risk to entities within their group. They need to pay close attention to the possible impact of the crisis on their parent and group counterparties. The Board and senior management have the responsibility to ensure that they have robust recovery options in place for all situations, including in the event that group support is not available. The topic of intra-group exposures was explored in our June 2021 Newsletter.

It is worth reminding firms of their obligations under Article 138 of the Solvency II Directive (Non-Compliance with the Solvency Capital Requirement (SCR)).[1] This "requires insurance and reinsurance undertakings to immediately inform the supervisory authority as soon as they observe that the SCR is no longer complied with, or where there is a risk of non-compliance in the following three months".

Conclusion

The points covered above are clearly non-exhaustive. Despite the current focus on the Ukraine conflict, there are many other well-rehearsed systemic risks faced by firms, including the COVID-19 pandemic, which is still in full force in many parts of the world and is not yet over.

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1. Regulation 146 of the European Union (Insurance and Reinsurance) Regulations 2015

Insurance Insights

The rapid escalation of the crisis in Ukraine, coming itself on the tail of a pandemic, is a reminder that firms and regulators alike need to have a risk management focus that goes beyond a small number of well-defined risks and scenarios to take in broader questions of resilience and the embedding of strategic and operational agility.

Firms, therefore, have much to consider depending on the complexity of their business model and their product and geographical footprint. The Solvency II regime and, in particular, the own risk and solvency assessment process, provides a solid framework through which directors and senior managers can navigate the uncertainty and volatility.

If during this period, matters of concern arise or potential risks look likely to crystallise, firms should engage in a timely manner with their relevant Central Bank supervisor.

We are actively engaged with EIOPA on its response to the crisis, and will be leveraging their analysis, insights and initiatives as appropriate. The Bank may, from time to time, ask for additional information from firms as part of its market intelligence gathering, or in relation to specific exposures and/or mitigating actions, particularly if there is an escalation of the current situation.

Peter Towers,
Manager, Internal Models & Financial Resilience
Insurance Supervision Directorate

Measuring the digital maturity of the Irish Insurance Market

The Central Bank recognises the potential impact of digitalisation on the financial system – 'Future Focus' is a key pillar of our 2022-2025 Strategy

Addressing the adoption of digitalisation within the financial system is a key priority for the Bank. Digitalisation refers to the adoption of technological innovations within financial services business models, and has the potential to impact the entire insurance value chain, from product development through to the settlement of claims.

A recent Deloitte survey reported that despite the challenging environment the insurance sector faces as a result of COVID-19, most insurers have plans to increase investment in technologies and talent in order to enhance their digital capabilities and customer experience.

Adoption of digital business models brings risks, as well as benefits. In one hand, new technologies have the potential to increase efficiencies across the entire insurance value chain, enabling insurers to become more consumer-focused, in the other hand, the adoption of new technological innovations may exacerbate some existing risks and create new ones. For instance, data security risks, outsourcing risks, data ethical concerns, etc.

Firms that fail to innovate may struggle to compete effectively over the longer term. Conversely, firms adopting new technologies without a sound strategy or effective processes and controls in place may also be at greater risk of financial distress or failure, putting at risk both consumers and the wider economy.

"we expect firms to have strong governance structure in place to monitor and respond to potential risks that may arise as a result of the adoption of new technologies"

We expect Irish insurance undertakings to give appropriate consideration to assessment of digitalisation risks within their risk management frameworks, and the ORSA in particular. In addition, we expect firms to align their business strategy with their digital transformation plans, whilst adopting a holistic approach throughout their digital journey. In addition, we expect firms to have strong governance structure in place to monitor and respond to potential risks that may arise as a result of the adoption of new technologies (e.g. artificial intelligence, Internet of things, etc.) within a firm's business model, not only from a prudential point of view but also from an ethical perspective, ensuring that consumers are treated in a fair and transparent way.

In order to better understand the extent to which Irish undertakings are using technological innovations such as big data and associated technologies as part of their business models and operations, and the management of digitalisation risks, the Bank will issue a Digitalisation Survey later this year to a sample of regulated firms across all insurance sectors. Some firms have already provided information as part of a separate Data Ethics project and we will seek to minimise any duplication of effort on their parts. A short consultation process will be undertaken, followed by issuance of the survey during the second half of the year. Undertakings will have adequate time to submit responses. The output of this exercise will be used to inform future supervisory strategy and engagement with firms in the context of digitalisation.

Specifically the survey will focus on:

- Level of awareness of the adoption of technological innovations such as big data, machine learning, Internet of thing, etc. across the insurance value chain.
- Integration between business strategy and digital transformation plans, when applicable.
- Level of understanding of the nature of digitalisation related risks, corresponding exposures, and measures in place to mitigate such risks; and
- Any additional measures that undertakings are involved in to address digitalisation risk.

If you have any queries in relation to the Digitalisation Survey please email: INSA_EmergingRisksTeam@centralbank.ie

Katheryn De Ornelas
Risk Analyst
Advisory Team | Insurance
Advisory Division

Review - Use of Exempt Ancillary Insurance Intermediaries in the Insurance Sector

The Bank recently completed a review of the use of Exempt Ancillary Insurance Intermediaries (EAIIs) in the Insurance Sector. We undertook this review as our sectoral risk assessment highlighted that the sale of insurance products on an ancillary basis could be a potential risk to consumers. This is because consumers are typically more focussed on the purchase of the primary product, and less on the ancillary insurance product. Our review focused on understanding the extent to which EAIIs are used to distribute insurance products in the Irish market, and the level of oversight that EAIIs are subject to, by insurance undertakings/intermediaries, and whether this meets legislative requirements.

The European Union (Insurance Distribution) Regulations 2018 (the IDR) introduced an 'ancillary insurance intermediary' as a type of insurance intermediary, as well as the circumstances in which an ancillary insurance intermediary can be exempt from the [requirements of the IDR] (referred to as an Exempt Ancillary Insurance Intermediary or EAII). Regulation 3 of the IDR also sets out the oversight requirements for EAIIs.

Our review included research of the market and an information request to relevant non-life insurance providers, both domestic and EU-based. A subset of insurers and retail intermediaries were then selected for a more detailed analysis, which focussed on the arrangements in place by these entities to perform their oversight obligations in relation to EAIIs.

Based on our analysis, the main product lines distributed through the EAII channel are travel insurance, motor products, gadget and accidental damage insurance. The most typical examples identified during the Review included:

(i) travel agents/airlines that provide travel insurance in conjunction with booking a holiday/flight;
(ii) high street retailers providing gadget/accidental damage insurance with the purchase of an electronic device/white goods;
(iii) furniture retailers providing protection insurance in conjunction with buying new furniture;
(iv) motor dealers that provide extended warranties when selling a car; and
(v) car hire companies that provide personal accident insurance when hiring a car.

Our review identified a number of areas that should be addressed by firms to improve their oversight of EAIIs. The key areas, where differing standards were identified, were:

1. **Remuneration arrangements between firms and EAIIs** - When examining the topic of remuneration, the review team identified varying levels of oversight between firms. For example, while some firms have clear processes, which prohibit incentivisation of EAII staff for selling ancillary insurance products, other firms were unable to confirm the remuneration processes for the sale of such products, which showed a lack of oversight of EAII remuneration practices. Firms should have adequate oversight of EAII arrangements in order to satisfy themselves that the requirements of Regulation 30 (3) are being met and that EAIIs are acting honestly, fairly and professionally in accordance with the best interests of their customers.

2. **Recording of reasons for cancellation of policies** – The review identified varying standards when recording the reasons for cancellation of policies sold through EAIIs. While all firms were able to provide information on cancellation rates, some firms disclosed that they do not record the reasons behind cancellations. The recording of cancellation reasons can be beneficial as it can help identify potential trends or other issues with how the products are being sold.
3. **Inadequate procedures** – It was identified during the review that some firms had inadequate procedures, for example, in relation to undertaking audits of EAIIs or for on-boarding of new EAIIs. Firms should ensure that they have adequate procedures in place for overseeing all aspects of their relationship with EAIIs. Regulation 3 (3) of the European Union (Insurance Distribution) Regulations 2018

Clive Duignan,
Supervisor,
Consumer Protection Directorate

IMF Financial Sector Assessment Program – Update

The Financial Sector Assessment Program (FSAP) is a comprehensive and in-depth assessment of a country's financial sector undertaken by the IMF. FSAPs analyse the resilience of the financial sector, the quality of the regulatory and supervisory framework, and the capacity to manage and resolve financial crises. Based on its findings, FSAPs produce recommendations of a micro- and macro-prudential nature, tailored to country-specific circumstances. FSAP assessments are required every 5 years in jurisdictions with systemically important financial sectors, including Ireland. An overview of the 2022 Ireland FSAP was provided in our June 2021 Insurance Newsletter.

An extensive programme of work has been underway since last year and will continue into the summer months. An important strand of the quantitative risk analysis for the insurance sector has been a suite of stress test exercises, focusing on solvency, liquidity and climate risks. These have utilised both "top down" and "bottom up" methodologies, with the former being the approach for the solvency and the climate transition risk stress tests, and the latter for the liquidity and the climate physical risk exercises.

A number of (re)insurers have been involved in supporting this work. They were chosen either to achieve a minimum market coverage (by gross written premium) across the life, non-life and reinsurance sectors, or as being representative of the different business models seen in Ireland. Their participation involved undertaking the necessary modelling to calculate the impact of prescribed stresses in the case of the bottom up stress tests and/or commenting on the results of the top down analysis undertaken by the IMF using its own models.

Stress tests conducted during an FSAP are a macroprudential exercise, which means that they are not to be considered as pass/fail exercises at the individual company level. No company-specific results will be disclosed by the IMF when it publishes its Ireland FSAP conclusions later this year – instead results will be aggregated.

We are extremely grateful for the time and effort the participating firms have put into the FSAP. The output is already informing our supervisory activities and, through our intended firm level and industry feedback, hopefully in due course, the industry's own risk management efforts. Stress tests are an increasingly important feature of the risk management landscape, and the practical lessons learnt from the exercises will help the Bank with the design and logistics of future initiatives of this type.

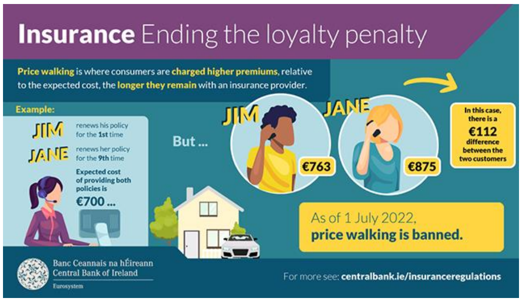
Peter Towers,
Manager, Internal Models & Financial Resilience
Insurance Supervision Directorate

Insurance Updates

Insurance Arrangements Regulations 2022

On 15 March 2022, the Bank published the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Insurance Arrangements) Regulations 2022 (the Regulations), which will apply to insurance undertakings and insurance intermediaries from 1 July 2022. In summary, the Regulations introduce the following new consumer protections:

- A ban on price walking in the motor and home insurance markets. From 1 July 2022, insurance providers cannot charge renewing customers a premium that is higher than they would have charged an equivalent year one consumer renewing their policy. However, to support competition and switching, new customer discounts will be allowed.



- Insurance undertakings and insurance intermediaries will be required to carry out an annual review of motor and home insurance pricing policies and processes to ensure sound practices.
- The Regulations set out the information that must now be provided to consumers in advance of the automatic renewal of an insurance policy, including the right to cancellation. This is another measure to encourage consumers to consider the potential benefits of switching and to increase consumer awareness of the options available to them at renewal time.

View the related Press Release on our website.

Central Bank of Ireland Portal – Request Changes

The Central Bank of Ireland Portal (the Portal) was introduced in August 2020 and since then we have received approximately 15,000 Request Changes. The Portal enables authorised users to view information relating to their institution; to notify the Bank of required changes to that information; and to communicate with the Bank regarding these changes via Portal messages.

We wish to remind all Insurance Undertakings that they are required to use the Portal for the submission of the following Request Changes:

- Acquiring Transaction Notifications
- Approval of Ancillary Own Funds
- Approval of Basic Own Funds
- Branch Application submissions
- Change of Accounting Date
- Change of Address
- Change of Auditor
- Change of Business Plan
- Change of Legal Advisor
- Change of Legal Name
- Change to Contact
- Derogation from Corp. Gov. Requirements
- Derogation from Domestic Actuarial Regime
- **Derogation from Recovery Plan Requirements***
- Extension of Insurance Classes
- Approval of Matching Adjustment
- Portfolio Transfer
- Revocation of Insurance Authorisation
- SCR Calculation - Internal Model Full
- SCR Calculation - Internal Model Partial
- Approval of Transitional Risk Free Rates
- Approval of Transitional Technical Provisions
- Approval of Undertaking Specific Parameters
- Approval of Volatility Adjustment
- Waiver - Group ORSA
- Waiver - Group SFCR
- Waiver SFCR

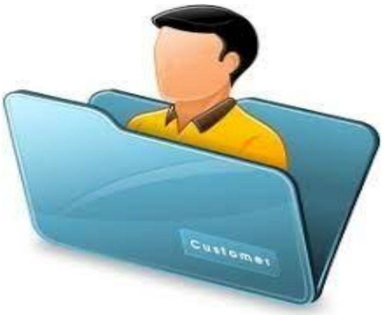
*Available on the CBI Portal from 25 March 2022

Further information on the Central Bank of Ireland Portal is available here on our website.

Insurance Updates

Requirement to maintain up-to-date customer records

The Bank requires insurers to comply with Provision 11.5(b) of the Consumer Protection Code 2012 (the 'Code') which states that *a regulated entity must maintain up-to-date records containing the consumer's contact details.* Following a number of engagements with Life Insurance undertakings, we have noted an issue of potential consumer detriment in relation to difficulties some firms have in contacting policyholders, particularly where policies are paid up.



Customers can become uncontactable for a number of reasons, including if a policyholder has moved house and has failed to advise the firm, or if a policyholder has passed away and the firm hasn't been notified. Issues have also arisen where Life Insurance undertakings have experienced difficulties identifying legacy pension policyholders as a result of schemes terminating following the closure or change in circumstances of employers resulting in firms ceasing business. As a result of these disorderly windups of pension schemes, Life Insurance undertakings often encounter challenges if they have failed to hold up-to-date policyholder information/contact details.

Following a review of actions taken by certain firms in the past, a number of good practice measures have been observed that other firms may wish to consider in an attempt to trace uncontactable policyholders, whilst adhering to the parameters of the General Data Protection Regulation ('GDPR'). These include:

- Engage the host mailing service provided by the Department of Social Protection ;
- Engage in media campaigns including national newspapers, Facebook and local radio awareness campaigns;
- Employment of tracing services agencies;
- Compare names and details against current records to ascertain if other policies are held by policyholders;
- Engage with the Pensions Authority;
- Contact former financial advisers to pension schemes to seek any personal details held; and
- Conduct a general awareness campaign with specific financial advisers in key areas of potential member density.

In the context of ensuring compliance with Provision 11.5(b) of the Code, the Bank expects regulated entities to have appropriate policies and procedures in place to proactively attempt to trace uncontactable policyholders, from when they are first identified as being uncontactable, until such time as they become subject to the requirements of the Unclaimed Life Assurance Policies Act 2003.

Use of Service Companies in the Insurance Sector

On 31 January 2022, we published Guidance on the Use of Service Companies for Staffing Purposes in the Insurance Sector following a period of consultation and consideration of the feedback received to CP144. This Guidance outlines our expectations of insurance and reinsurance (undertakings) who choose to enter staffing arrangements of this nature. We expect undertakings to take the necessary steps to review such arrangements and ensure they are updated and augmented, as appropriate, to align with the expectations set out in the Guidance. We expect undertakings to have conducted that review and augmentation, where appropriate, within 12 months of the implementation of the Guidance.

Central Bank Updates

Recent Enforcement Cases relevant to the Insurance Sector

The Bank discharges its duties through a high-quality regulatory framework, delivering effective gatekeeping, and intrusive supervision underpinned by robust enforcement powers. We are committed to taking action, and purposefully deploying the appropriate enforcement tool, to address serious breaches of regulatory requirements and misconduct by firms or individuals. Given our broad regulatory mandate, our enforcement actions often deliver cross-sectoral guidance and demonstrate what we care about and what firms and their management should care about.

The following recent enforcement actions contain important cross-sectoral messages.

Case 1 - Insure4Less Teoranta t/a Kerry Insurance Group

On 1 March 2022, the Bank reprimanded and fined Insure4Less Teoranta €8,400 in respect of three breaches of fitness and probity ("F&P") obligations under the Central Bank Reform Act 2010.

- **The breach** - Insure4Less Teoranta failed to obtain prior approval before appointing three individuals as directors of the firm.
- **The fine** - The Bank determined the appropriate fine to be €12,000, which was reduced by 30% to €8,400 in accordance with the settlement discount scheme provided for in our Administrative Sanctions Procedure (ASP).
- **Key message**: The F&P regime is central to the Bank's role as a gatekeeper for the financial system, and in ensuring that we can assess whether the most senior people working in the financial services industry are competent and capable, honest, ethical and of integrity and also financially sound. As well as acting as a deterrent to this firm, this enforcement action serves as a reminder to all regulated firms, in all sectors and regardless of size, of the importance which we attach to F&P compliance.

Case 2 - Bank of Ireland

On 30 November 2021, the Bank reprimanded and fined the Governor and Company of the Bank of Ireland (BOI) €24,500,000 for breaches pertaining to its IT service continuity framework and related internal control failings.

- **The breach** – BOI failed to have a robust framework in place to ensure continuity of service for BOI and its customers in the event of a significant IT disruption.
- **The fine** - The Bank determined the appropriate fine to be €35,000,000, reduced by 30% to €24,500,000 in accordance with the settlement discount scheme.

- **Key Message** – This case is an example of robust enforcement action where failures expose consumers and the financial system to serious potential risk. We expect boards and senior management of firms to implement and operate robust risk and control frameworks, which recognise and address risk issues in a timely way as part of an effective risk culture. It is vital that firms have a framework in place so that they can ensure continuity of critical IT services and minimise the impact of any significant disruption. This is a core element of operational resilience designed to protect consumers and ensure financial stability, and is a key area of our supervisory strategy and the European Central Bank's supervisory strategy

Anne-Marie Butler,
Senior Lawyer,
Advisory Team,
Insurance Supervision Directorate

Forward Planner & Communications

Upcoming Dates

20 May 2022 - Annual Returns - Group Submission Deadline

Mar | Apr | May | June

8 April 2022 – Annual Returns - Solo Submission Deadline

16 June 2022 – Publication of Q2 Insurance Newsletter

Recent Speeches & Publications

Date	Topic	Link
11 March 2022	"The role of financial regulation in building resilience, anticipating risk, and protecting citizens – in steady times and through shocks" - Speech by Director General, Financial Conduct, Derville Rowland	https://www.centralbank.ie/news/article/speech-derville-rowland-role-of-financial-regulation-in-building-resilience-anticipating-risk-and-protecting-citizens-in-steady-times-and-through-shocks-10-march-2022
9 March 2022	"Changing individual behaviour and culture in financial services" - Speech by Director General, Financial Conduct Derville Rowland	https://www.centralbank.ie/news/article/speech-derville-rowland-changing-individual-behaviour-and-culture-in-financial-services-09-march-2022
21 February 2022	"The spirit in the machine: considering evolving financial regulation" – Remarks by Gerry Cross, Director of Financial Regulation – Policy Risk, at the Compliance Institute	https://www.centralbank.ie/news/article/speech-by-gerry-cross-at-compliance-institute-21-february-2022

Contact Us

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