



BERMUDA MONETARY AUTHORITY

DISCUSSION PAPER

**A CONDUCT OF BUSINESS REGULATORY FRAMEWORK FOR
BERMUDA**

19 AUGUST 2020

TABLE OF CONTENTS

I. INTRODUCTION	2
II. GLOBAL CONDUCT OF BUSINESS REGULATION	3
III. GLOBAL FINANCIAL CONSUMER PROTECTION REGULATION	6
IV. PROPOSAL FOR THE REGULATION CONDUCT OF BUSINESS IN BERMUDA'S FINANCIAL SERVICES SECTORS	7
V. PRINCIPLES GOVERNING GOOD CONDUCT OF BUSINESS AND CONSUMER PROTECTION	8
VI. WHAT ARE REASONABLE OUTCOMES FOR EFFECTIVE CONSUMER PROTECTION?	11
VII. PROPOSED ROAD MAP TO ENHANCING REGULATORY OVERSIGHT	11
VIII. CONCLUSION	12
SURVEY 1 – DISCUSSION QUESTIONS	13
SURVEY 2 – CONSUMER SURVEY	17

The views of stakeholders, and others within the financial services industry and of any other interested persons, on this paper are invited. Survey responses should be sent digitally via the below links, not later than 30 September 2020. General comments can be sent via email to conduct@bma.bm.

- [Discussion questions for all stakeholders - Survey 1](#)
- [Survey for consumers of financial services and products in Bermuda - Survey 2](#)

I. INTRODUCTION

1. The Bermuda Monetary Authority (Authority) recently undertook an internal review that examined the alignment of the Authority's strategic plan and operations against its stated objectives and statutory mandate as the sole regulator of Bermuda's financial services sector. As a result of this review, the Authority decided to pursue the creation of a risk-based regulatory regime to foster appropriate consumer protection as one of its key strategic initiatives. Although the Authority is a prudential regulator and not a conduct regulator, it is of the view that it is important to regulate the conduct of business within the financial services sectors it regulates, in order to protect financial services consumers. The proposals in this paper are intended to assist the Authority in determining if and how it could expand its current limited conduct scope.
2. Currently, the Bermuda Monetary Authority Act 1969 (BMA Act) does not provide the Authority with a specific power to enforce consumer protection; however, certain acts, such as the Insurance Act 1978, make explicit note of the Authority's role in protecting the clients and potential clients of registrants. Additionally, the Authority has always employed elements of consumer protection within its prudential framework by employing the good conduct of its licensees and registrants to mitigate harm to consumers. These include the requirements surrounding conducting business with integrity and skill, fair dealing, disclosures, conflicts of interest, complaints handling, client relationships and client asset protection, which are mainly found in the various sector-specific codes of conduct or practice issued by the Authority. These are primarily concerned with preventing breaches of law rather than focusing on fair outcomes for consumers specifically.
3. While there is no single, generally accepted definition of business conduct, for the purposes of this Discussion Paper (DP), 'business conduct' refers to the actions or non-actions (i.e. behaviour) of financial services firms that may affect consumers or potential consumers. This behaviour stems, inter alia, from the behaviour of individuals at any level within the firm, the firm's strategy, business model, culture, governance and other internal frameworks, and its systems and processes. The Authority has chosen to utilise 'conduct' or 'conduct of business' (opposed to 'market conduct') as it broadly encompasses consumer protection matters. This latter term is interpreted more narrowly: in some contexts¹, purely focusing on the activities within the securities markets; specifically, what behaviours amount to market abuse.

¹ I.e. the regulatory frameworks of the UK and Guernsey, and the work of the International Organization of Securities Commissions (IOSCO) and the Financial Stability Board (FSB).

4. Financial products and services are vitally important in the everyday lives of consumers. They enable them to pay for goods and services, insure against future risks, save for retirement and borrow to meet short- and longer-term needs. They can, however, also pose risks where the firm's conduct creates or contributes to a consumer's financial harm. In recent years, the Authority has seen an increase in the number of complaints received from financial services consumers regarding the conduct of licensed firms.
5. Globally, over the last decade, the mitigation of misconduct risk and the protection of financial services customers has become a priority objective for regulators and international standard-setting bodies. Since the 2007-2009 financial crisis, a robust conduct supervision regime is seen as a means to secure fair outcomes for consumers on an individual level, whilst also supporting the long-term stability of the financial system through increased consumer trust and market confidence.
6. The Authority recognises that widespread misconduct can lead to financial failures or market disruptions and, as such, seeks to strengthen its supervision in this regard. By enhancing requirements for good business conduct and consumer protection across the financial services sectors it regulates, the Authority hopes to improve consumer outcomes. Many of the specific changes proposed in Section V below are driven by consumer complaints received by the Authority and the evolution of international best practice.
7. In its 2020 Business Plan, the Authority committed to exploring the development of a conduct of business regime for the financial services sectors it regulates. Ultimately, the Authority intends to expand its statutory mandate, pursuant to section 3 of the BMA Act, to develop oversight of the conduct of the financial services sectors it regulates and support the protection and awareness of financial services for consumers. As stated in the Business Plan, in enhancing its regulatory framework in this way, the Authority is committed to developing and applying international standards whilst maintaining its pragmatic approach.
8. This DP represents the Authority's first step in its proposal to explore consumer protection by regulating the business conduct of financial services providers licensed by the Authority and seeks input from relevant stakeholders (i.e. licensed financial institutions, clients of the licensees and industry groups). The content expressed in this DP is only intended to facilitate discussion and should not be construed as the Authority's decided approach to regulating conduct of business. Rather, the feedback elicited from this DP is intended to materially assist the Authority in formulating a final proposal.

II. GLOBAL CONDUCT OF BUSINESS REGULATION

9. The regulation and supervision of conduct has two aims. First, to ensure that financial markets operate fairly and efficiently, and second, that consumers are protected. Often,

the protection of consumers is seen as the ultimate goal. However, consumers also benefit by regulatory efforts to promote fair competition amongst financial services providers, whilst ensuring that they are well capitalised to meet their obligations to other market participants and consumers, and safeguarding the stability and efficient operation of the markets.

10. Whilst it is widely agreed amongst international standard-setters that conduct supervision is important and that there are certain critical elements of good conduct, there is no agreed view on the optimal approach to this type of supervision. Moreover, there are significant distinctions in thinking amongst the various financial sector authorities and bodies, each taking a different view of their sector's products, institutions and infrastructures. The following paragraphs outline the different approaches taken by certain international standard-setters.
11. IOSCO has conducted a comprehensive review of its 38 principles and standards of securities regulation and identified five categories of conduct which should be addressed in regulations:
 - Honesty
 - Upholding market integrity
 - Conflicts management
 - Competence
 - Communication and confidentiality
12. IOSCO has produced several studies and reports focusing the attention of its members on the effects of good conduct, not just for consumer protection, but also for market stability and effective competition. The primary focus of IOSCO's task force work to date has been on the wholesale market (as opposed to the retail market). In particular, a report² published in 2017 aimed to assist members in discouraging, identifying, preventing and sanctioning misconduct by individuals in the wholesale market. It was hoped that preventing misconduct would increase investor trust and confidence and promote the fair and efficient operation of the markets.
13. Similarly, the Bank for International Settlements (BIS) and the Basel Committee on Banking Supervision (BCBS) have kept their core principles for effective banking supervision under continuous review. The focus of this work is the prudential regulation of banks and banking systems. Given the fundamental deficiencies in banks' corporate governance that were exposed during the financial crisis leading to consumer harm, greater emphasis was given to sound corporate governance practices. Greater prominence was also given to public disclosure and transparency, although there was no specific inclusion of conduct risk as the principles remain focused on financial risks.

² IOSCO Task Force Report on Wholesale Market Conduct – June 2017

14. The International Association of Insurance Supervisors (IAIS) addresses conduct of business extensively in its Insurance Core Principles (ICPs); particularly, in ICP 19 which sets standards for regulated insurance business in the following areas:

- Introductory guidance
- Respective responsibilities
- Cross-border and group considerations
- Supervisory cooperation
- Fair treatment of customers
- Conflicts of interest
- Product development and pre-contractual stage
- Promotion of products which is clear, fair and not misleading
- Advice to take into account customer's disclosed circumstances
- Policy servicing
- Transparent, timely and fair claims handling
- Complaints to be handled in a timely and fair manner
- Protection and use of information on customers
- Information supporting fair treatment (supervisor disclosures)

15. Similar to the diverging approaches amongst international standard-setting bodies, individual jurisdictions also approach conduct of business supervision differently based on their own national objectives, priorities, experiences and financial regulatory architecture.

16. In some jurisdictions, unlike Bermuda, there are separate supervisory authorities for each financial sector, and they have responsibility for prudential and conduct supervision for the sector they supervise. In New Zealand, for example, the Financial Markets Authority (FMA) is responsible for enforcing securities financial reporting and company law as they apply to financial services and securities markets. Working with other government agencies, such as the Reserve Bank of New Zealand (Banking and Insurance) and the Commerce Commission (Competition), they focus on the conduct of business and efficiency in financial markets.

17. Many jurisdictions have a stand-alone conduct regulator to cover multiple sectors. In the UK, the regulatory structure changed in April 2013 so that the former Financial Services Authority was replaced by two new regulators (the twin peaks approach) with distinct statutory mandates, the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA). The PRA acts as the prudential regulator of banks, building societies, credit unions, insurers and major investment firms. The FCA has a wide conduct remit including protection of consumers and financial markets and promotion of competition in multiple sectors.

18. Finally, other jurisdictions have one integrated authority with responsibility for multiple business sectors and covering prudential and conduct concerns. In Ireland, the Central Bank of Ireland has responsibility for both prudential regulation and conduct of business

and consumer protection concerns for multiple sectors including banking, insurance and securities. Given the size and scale of Bermuda's financial services market, this would likely be the model Bermuda will follow, where the Authority will be the integrated financial services regulator.

III. GLOBAL FINANCIAL CONSUMER PROTECTION REGULATION

19. In researching conduct of business supervision regimes and associated international standards, the Authority formed the view that our initial focus should be on financial consumer protection. This is because when consumers are not protected, this can adversely affect financial stability and market confidence. When firms engage in misconduct towards their customers, it can affect how consumers view an entire industry and harm a jurisdiction's reputation.

20. With this in mind, the Authority reviewed the G20 High-Level Principles on Financial Consumer Protection report³ which was endorsed by the G20 and later by the Organisation for Economic Co-operation and Development (OECD). All financial sectors are covered; however, the principles do not deal with sector-specific issues. The 10 principles cover the following areas:

- Legal, regulatory and supervisory framework
- Role of oversight bodies
- Equitable and fair treatment of consumers
- Disclosure and transparency
- Financial education and awareness
- Responsible business conduct of financial services providers and authorised agents
- Protection of consumer assets against fraud and misuse
- Protection of consumer data and privacy
- Complaints handling and redress
- Competition

21. As a result of the work carried out by the supranational bodies, regulators globally have also increased their focus on financial consumer protection. In the UK, the FCA provides a number of resources for consumers of financial services to allow them to make informed decisions. The FCA works closely with the Competition and Markets Authority, the Financial Ombudsman Service and other agencies to achieve protection for consumers.

22. In New Zealand, the FMA has produced a number of resources aimed at educating financial services consumers and ensuring appropriate disclosures are made by firms.

³ G20 High-Level Principles on Financial Consumer Protection – October 2011

The FMA undertakes thematic reviews and monitoring to ensure firms comply with their obligations pursuant to the Financial Markets Conduct Act.

23. The regulatory approach to financial consumer protection is tailored by each regulator to reflect the differing expectations and experiences of consumers of the products of different types of financial institutions. For example, investors are concerned with having the risks of a particular investment explained to them accurately and having their investments managed competently, whilst insurance consumers are concerned with the fair handling of their claims and the insurers' ability to pay them.
24. The rapid development of financial markets, complex financial products and technological changes are driving standard-setting bodies to continue to urge national regulators to focus on consumer protection. The OECD, in particular, has highlighted the need for oversight authorities to have the necessary mandates and resources to carry out separate consumer protection functions and to avoid allowing the speed of innovation to produce regulatory gaps.

IV. PROPOSAL FOR THE REGULATION OF CONDUCT OF BUSINESS IN BERMUDA'S FINANCIAL SERVICES SECTORS

25. Following the research outlined above, the Authority formed the view that in order to be effective, Bermuda's consumer protection regime must cater for both retail and wholesale consumers. The Authority considers it pragmatic to first focus on the conduct of financial services firms catering primarily to retail consumers as opposed to those serving wholesale counterparties. Ideally, the focus of the Authority's attention would be to narrow the gap between treatment of wholesale and retail consumers as the conduct regime matures. As such, the Authority intends that the principles, as stated under section V, will be drafted so as to be broadly applicable, but the initial implementation of the framework will focus on those sectors and firms which primarily cater to retail consumers.
26. Retail consumers generally choose financial services and products for their own use and will consist of individuals and potentially small- or medium-sized businesses. Typically, they will be smaller and less sophisticated consumers, motivated by their own needs. Retail consumers, though responsible for the decisions they make, cannot always be expected to have enough financial knowledge, information and understanding of complex products and risks to decide what is in their best interest.
27. Wholesale consumers are sophisticated and professional counterparties and are generally better informed than retail consumers. Moreover, as result of their size, wholesale consumers have greater purchasing power to leverage better outcomes for themselves when compared to their retail counterparts. Due to their size and sophistication, often wholesale consumers are dealing in financial instruments tailored to their specific needs, which will eliminate many of the product-suitability concerns present in the retail market.

28. In order to regulate conduct in the specialised wholesale market, the Authority would require a highly nuanced regulatory approach. This approach would likely necessitate more sophisticated analytics and a more intensive level of reporting to monitor the higher transaction volumes and greater uses of new technology which occur in some wholesale markets.
29. Given the differences in the structure of the retail and wholesale markets, the areas of concern for regulators of conduct in these markets will be different. However, there are some areas of commonality which can be applied to both, as reflected in the IOSCO work noted above. In light of this, the principles the Authority proposes may usefully be applied to protect both the retail and wholesale consumer. While the Authority's initial approach will focus on retail consumer protection, by encouraging good conduct in financial services firms, this will also positively affect outcomes for wholesale consumers.

V. PRINCIPLES GOVERNING GOOD CONDUCT OF BUSINESS AND CONSUMER PROTECTION

30. In assessing the critical elements of good conduct of business, the Authority has identified six essential high-level principles required to secure a high degree of protection for consumers of financial services. In forming this view, the Authority has determined that an effective regulatory framework for conduct of business must create a financial services sector where financial institutions give greater regard for the needs and vulnerabilities of consumers. This means that firms treat customers equitably according to their financial acumen, and position their business practices and corporate culture to achieve this. The Authority recognises that consumers need to have clear and comprehensible information to make timely decisions about the products and services they choose. Moreover, they should have available the appropriate educational tools and mechanisms to better understand financial risks and complex products and services. Consumers should have confidence that firms they are dealing with will protect their assets from inappropriate use. Lastly, the nature of complaints received by the Authority underscores the need for consumers to be able to raise complaints and reasonably expect redress where issues arise in the course of their relationship with financial institutions.
31. The Authority recognises that much of the content in the below principles mirrors the requirements that currently exist in some sectoral codes of conduct or practice. However, the Authority's objective in proposing these high-level, cross-sectoral principles is to regularise expectations of conduct for all Authority-licensed entities. Currently, there is variation on code requirements across sectors, and the Authority recognises that this has the potential to create uncertainty and inefficiencies for entities which hold multiple licences. If adopted, the Authority envisions that these high-level principles will guide the conduct of all licensed entities generally, and the sector-specific codes will impose more sector-specific conduct requirements.
32. The below principles are aligned to the international best practices and principles promulgated by the IAIS, IOSCO, OECD and the World Bank. The Authority is of the

view that the adoption of these principles will further underscore its commitment to its membership within such bodies (specifically, the IAIS and IOSCO). The Authority notes that although the emphasis and supervisory techniques will differ across sectors, the following principles would be applicable to all sectors unless noted.

1. *Fair and equitable treatment of consumers*

- Firms should deal fairly and honestly with consumers at all stages of their relationship so that it is an integral part of the business culture
- Firms should consider the outcome for consumers of their products, services, procedures, strategies and practices
- Firms should avoid practices that harm consumers, particularly with respect to vulnerable and disadvantaged consumers
- Firms should provide consistent care and reporting to consumers throughout the duration of any relationship

2. *Responsible business practices*

- Where possible, firms should assess the suitability of a product or service vis-a-vis the consumer's need, risk appetite and financial capacity
- Firms should not unduly limit the consumer's ability to cancel or transfer a product or service to another provider on the consumer's reasonable notice
- Firms should ensure that relevant staff and authorised agents are sufficiently qualified, trained and experienced to discharge their duties properly and are supervised appropriately
- Firms must manage conflicts of interest and must not unfairly place their interests above those of consumers
- Firms must have adequate systems and processes for the effective management and control of conduct risk in their business activities
- Firms should include monitoring on an ongoing basis to ensure that internal controls to protect consumers are being adhered to, with penalties for non-compliance

3. *Disclosure and transparency*

- Firms should provide information that is complete, timely, accurate and not misleading regarding their goods and services, terms, conditions, applicable fees, commissions and final costs to enable consumers to make informed decisions
- Firms should ensure easy access to this information, especially to the key terms and conditions, regardless of the means of technology used
- Firms should communicate with consumers in language that is simple, easy to understand and ensure information is presented in a way that is likely to be understood

4. Protection of consumer assets against loss, fraud and misuse

- Firms should have in place appropriate controls and protection mechanisms for the protection of consumers' deposits, investments and other similar financial assets, including against fraud, misappropriation or other misuses

5. Dispute resolution mechanisms

- Firms should make available complaints-handling mechanisms that provide consumers with expeditious, fair, transparent and effective dispute resolution without unnecessary cost or burden
- Firms should ensure that information on the complaints-handling procedure is publicly available, easy to locate and includes contact information for the responsible employee

6. Financial education and awareness for retail consumers

- Firms should, as appropriate, develop programmes and mechanisms to assist consumers with developing the knowledge and skills necessary to understand risks (including financial risks), to make informed decisions and to access competent and professional advice and assistance when needed
- Firms should appropriately inform consumers of their responsibilities to disclose relevant information and assist the firms in fulfilling its obligations

33. Overall, the Authority is of the view that these principles provide a pragmatic and reasonable basis for the regulation of financial services conduct of business from the respective standpoints of regulated financial institutions and consumers. The Authority intends that the principles will benefit the welfare of all consumers by:

- Increasing consumer confidence and trust in the firms that they deal with
- Setting certain reasonable expectations for consumers in their dealings with firms and with the financial services and products they purchase
- Mitigating risks to consumers' harm from misconduct or unintended side effects from a firm's actions
- Ensuring consumers are confident that the assets they entrust to a firm's care are protected from loss and will not be misused by the firm
- Empowering the consumer to make well-informed decisions

34. In the regulation and supervision of conduct, it is the Authority's general expectation that consumers maintain a level of responsibility for their own choices and decisions. Equally, the Authority expects firms to use care in dealing with consumers and accommodating

varying degrees of consumer experience and expertise in relation to products, such that they enable consumers to make better decisions.

VI. WHAT ARE REASONABLE OUTCOMES FOR EFFECTIVE CONSUMER PROTECTION?

35. In designing regulation for the protection of consumers, the Authority considers it important to remain guided by the outcomes to be achieved for consumers and, therefore, considers it important to raise discussion around these expected outcomes, which are:

- Consumers have confidence and trust that the financial service providers they engage with will treat them fairly and with due skill and care
- Consumers are provided (or are enabled to find) clear and timely information to capably make informed decisions
- Where consumers have a dispute against a financial service provider, they are able to make a complaint, and the complaint is handled within a reasonable timeframe

36. The Authority considers that these three desired consumer outcomes concisely encapsulate the six elements of good conduct as outlined in the previous section. Moreover, these outcome statements are purposely drafted from the consumers' point of view, as they will regularise and set the bar for consumers' reasonable expectations in the way they engage with financial services firms moving forward.

VII. PROPOSED ROAD MAP TO ENHANCING REGULATORY OVERSIGHT

37. The Authority is of the view that the foremost action to enhancing regulatory oversight for conduct of business is to utilise this DP to solicit further views to inform decision making. Based on the additional data received, the Authority will further refine the content and structure of the proposed principles and the framework supporting them. A proposed consultation paper will solicit further stakeholder feedback once the Authority has chosen the proposed approach it will take to achieving the objectives noted herein. Finally, the Authority will move to implement the high-level principles across all Authority-regulated financial services. These principles are ultimately intended to apply to services and products sold or marketed to retail and wholesale consumers alike, and the Authority will seek to engage with stakeholders to ensure that we take a pragmatic approach as we apply the principles.

38. Subsequent to this, the Authority is of the view that the next step would be to address sector-specific conduct of business requirements in a sector-by-sector approach. The Authority is of the view that the expansion of the regime to each sector should be risk-based, focusing on the risks posed to consumers by the products and services offered, the status of each market sector in Bermuda and the risk posed to Bermuda's financial stability by the firms' operations.

VIII. CONCLUSION

39. The matters expressed and proposals presented in this DP are intended to initiate dialogue regarding potential legislative and regulatory changes.
40. The Authority seeks input from stakeholders on the issues which have been raised regarding oversight of financial services sector conduct of business for the protection of consumers.
41. The Authority welcomes views on the points presented, as well as on other related issues which the reader may deem appropriate.
42. In order to make a better-informed determination on how to structure and implement the proposed conduct of business regime, the Authority has included as Surveys 1 and 2 to this DP, discussion questions for all financial services stakeholders, and a brief survey for consumers of financial services in Bermuda to further highlight areas of particular concern.

Discussion questions for all stakeholders

Survey 1

Please note that all information submitted to the Authority will be held in confidence, and individual responses will not be used. Collated data will be utilised internally to guide the Authority's decision making.

1. Do you agree the Authority should expand its mandate to include the supervision of the conduct of business in the financial services sectors it supervises?

Yes No

Comment:

2. Do you believe another organisation would be more appropriate than the Authority for carrying out supervision of financial consumer protection? If yes, which one?

Yes No

Comment:

3. Do you agree that it is appropriate for the Authority's conduct of business regime to focus on achieving consumer protection as its primary objective, or would another objective be more appropriate? If no, what other objectives would be more appropriate?

Yes No

Comment:

4. In your view, what type of institution has the greatest impact on consumers' well-being in Bermuda? (Please select one)

- Banks
- Credit Union
- Insurers
- Investment businesses
- Investment funds
- Fund administrators
- Digital asset businesses
- Trust businesses

- Corporate service providers
- Money service business
- Other (specify in the comment box below)

5. In your view, what type of financial product/service has the greatest impact on consumers' well-being in Bermuda? (Please select one)

- Current accounts
- Savings accounts
- Credit cards
- Mortgages
- Other personal loans
- Discretionary investment management
- Financial advice
- Investment brokerage
- Mutual funds
- Private investment funds
- Unit trust funds
- Life insurance
- Personal general insurance (home, motor, marine, etc.)
- Commercial insurance
- Insurance brokerage
- Trustee services
- Money transfer services
- Corporate services
- Pay day loans
- Currency exchange
- Investment in crypto assets
- Digital asset transfer services
- Digital asset exchange
- Digital wallet services
- Digital asset issuances (formerly initial coin offerings)
- Other (specify in the comment box below)

6. Do you agree that the Authority's conduct regime should be targeted to protect only retail consumers, or should it also include wholesale consumers?

Only retail consumers Both retail and wholesale consumers

Comment:

7. Should small- and medium-sized businesses be included within the definition of retail consumers?

Yes No
Comment:

8. Do you agree with the scope of the Authority's consumer protection principles? If no, why not?

Yes No
Comment:

9. Do you think the Authority should consider expanding the consumer protection principles to include other high-level principles? If yes, what else should be included?

Yes No
Comment:

10. What do you feel is the most important consideration to be borne in mind by the Authority in formulating the framework for the application of the high-level principles to ensure it continues to reflect the Authority's pragmatic approach to regulation?

11. Do you agree with the scope of the Authority's consumer protection principles? If no, why not?

Yes No
Comment:

12. Do you believe that the three outcomes outlined provide reasonable and fair expectations of firms for consumers? What other outcomes would you like to see?

Yes No
Comment:

13. Do you agree with the proposed road map for expanding the consumer protection regulatory regime? If not, what would you change?

Yes No
Comment:

14. Do you believe Bermuda's financial consumer protection supervision should be expanded to include sectors other than those currently supervised by the Authority? Which ones?

Yes No
Comment:

15. Do you believe that the above approach will achieve the outcomes outlined? Why or why not?

Yes No
Comment:

Please note that all information submitted to the Authority will be held in confidence, and individual responses will not be used. Collated data will be utilised internally to guide the Authority’s decision making.

1. What is your age range?

- Under 18
- 18-29
- 30-65
- 65+

2. What is your annual household income?

- Less than BD\$40,000
- BD\$40,001-BD\$75,000
- BD\$75,001-BD\$100,000
- BD\$100,001-BD\$150,000
- Greater than BD\$150,000

3. What is your current working status?

- Employed – full-time
- Employed – part-time
- Unemployed
- Retired or semi-retired (i.e. drawing on a pension but still working)

4. Which of the following best describes financial decision-making in your household?

- I am the main decision-maker in the household
- I make my own decisions, but not those for other adults in the household
- I share responsibility with my spouse, partner or other adult
- I leave most financial matters to my spouse, partner or other adult
- All of my financial matters are dealt with by my spouse, partner, adult children or other adult
- I am unsure

5. Which of the following financial services/products do you currently use? (Please choose all that apply)

- Current accounts
- Savings accounts
- Credit cards
- Mortgages
- Other personal loans

- Discretionary investment management
- Financial advice
- Investment brokerage
- Mutual funds
- Private investment funds
- Unit trust funds
- Life insurance
- Personal general insurance (home, motor, marine etc.)
- Commercial insurance
- Insurance brokerage
- Trust
- Corporate services
- Money transfer services
- Pay day loans
- Currency exchange
- Investments in crypto assets
- Digital asset transfer services
- Digital asset exchange
- Digital wallet services
- Digital asset issuance (formerly initial coin offerings)

Comment

6. If you do not use any of these products/services in question 5, what is the primary reason? (Please comment below)

7. Please indicate if any of the products in question 5 are provided by your employer as part of your company’s remuneration package (i.e. you did not choose these products/providers yourself; you are merely utilising them).

Yes No

Comment:

8. Which types of investment do you currently hold? (Please choose all that apply)

- I don’t have any investments
- I am unsure of the type(s) of investments I hold
- Pension (not social insurance)
- Life insurance
- Unit trust or managed fund
- Savings, cash or bank/term deposit

- Shares
- Investment portfolio managed by an advisor

9. Are your accounts held in: (Please choose one)

- Bermuda dollars only
- A mix of Bermuda dollars and other currency
- Only a currency which is not Bermuda dollars
- I am unsure

10. Are your accounts held with: (Please choose one)

- A financial services provider in Bermuda
- A financial services provider located outside of Bermuda
- A mix of financial services providers located in Bermuda and overseas
- I am unsure of my financial services provider's location

11. Are you aware of the Bermuda Deposit Insurance Corporation?

Yes No

Comment:

12. Do you believe Bermuda should have an independent official to assist parties with resolving complaints by financial services consumers?

Yes No

Comment:

13. Has your financial services provider communicated with you in the last 12 months regarding your financial services product?

Yes No

Comment:

14. Do you receive regular account statements?

Yes No

Comment:

15. Do you use an online portal to access your financial services account information?

Yes No

Comment:

16. Have you closed an account with any financial services provider within the last 12 months?

Yes No

Comment:

17. If yes, did you experience any difficulty closing your account?

Yes No N/A

Comment:

Thinking of your most recent interaction with one of your financial services providers, please assess your agreement with the following statements:

18. I feel my financial services provider treats me fairly.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

19. I feel the staff were knowledgeable about the product/service they were selling me.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

20. I feel the information they provided me was appropriate and easy to understand.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

21. I feel they answered my questions clearly and knowledgeably.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

22. I feel they took the time to understand what my needs/circumstances are.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

23. I feel the product/service I purchased was appropriate for my needs.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

24. I feel the fees/commissions/terms and conditions associated with the product/services were clear to me.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

25. I feel my financial services provider gives good customer service.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

26. I trust my financial services provider.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

27. I only hear from my financial service provider when they are trying to sell me something.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

28. I know where to go/whom to contact to receive information from my financial services provider.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

29. I feel that my financial services provider was responsive initially, but now I never hear from them.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

30. I know how to make a complaint about my financial service provider's products/services.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

31. I have made a complaint about my financial service provider and it was handled appropriately.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree N/A

Comment:

32. I would know how to switch products/services or close my account if need be.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

33. I feel confident and knowledgeable in managing my money.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

34. I would be interested in improving my financial literacy.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

35. I understand I have a responsibility to provide accurate and up to date information to my financial services provider regarding my personal circumstances.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

36. I trust my financial services provider to protect the personal information I share with them.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

37. I have confidence in Bermuda's financial market.

Strongly agree Agree Neither agree nor disagree Disagree Strongly Disagree I am unsure

Comment:

38. Are there any additional comments you wish to make?

Comment: