



POLICY AND REGULATORY NETWORK

DATE: 05 JUNE 2020 (11.00 – 12.00)

LOCATION: VIDEO CONFERENCE

MINUTES

PRN Attendees:

Christina Ruebesamen – Siemens Bank

Robert Garai – Arab National Bank

Meng Barnie – Blom Bank France

Helen Nicolaou – DZ Bank

Francis Wood - BNYM

Danny Harrison – PNC Business Credit

Angela Cayon – Banco Sabadell SA

Adam Jesney – Sberbank CIB

Adam Sattar – KBC Bank N.V.

Andrew Creamer – ICICI Bank UK

Sophie Dupre-Echeverria – GIB UK

Clarence Kolandayan – DBS Bank

Daniel Marx – UBA

Deborah Wright – KBC Bank N.V.

Donatella Seidner – HBL Bank

Geoffrey Hunter – KfW IPEX-Bank

Greg Hughes – VTB Capital

Heiner Boehmer - Landesbank Hessen-Thüringen Girozentrale

Howard Miller - Citi

Jacobo Munoz - Coöperatieve Rabobank U.A.

Jonathan Bashforth – DBS Bank

Lizette Yulo - Bank of the Philippine Islands (Europe) plc

Stephen Richards - ING Bank N.V.

David Blackmore - Persia Bank (UK) Limited

David Knott – TD Securities

David Pfeiffer - Finantia UK

Andrew Brooke (AB) opened the meeting and referred to the AFB competition law advice. The following topics were discussed.

1. AFB Policy Initiatives – see attached

AB gave a brief outline of the items set out in policy initiatives table (dated 04/06/20) attached to the agenda.

One member highlighted that there is the difference between ESG and Climate Change and suggested separating the two topics when marketing events.

It was also noted that it had been suggested as part of the MiFID review that Spot FX be included within the scope of MiFID.

Another member commented that the current review of MiFID is being divided into two parts. The first part will focus on a quick fix on investor protection issues (referred to in the attached document – see item 4) and the second part, which will focus on transparency issues (including a proposal to extend the scope of MiFID) and will take place in 2021.

Another member said that on 7 May 2020 the European Commission's 6-point plan against money laundering set out a draft list of high risk countries. However, the list of high-risk countries is not the same as the list being used by FATF. It was suggested that it would be worthwhile engaging with the JMLSG on this issue, with a particular focus on how firms should implement this after Brexit. AB will raise this point in the newly formed Money Laundering Reporting working group

2. Policy working group member lists/updates

AB asked that members ask colleagues in their firms with appropriate expertise to join the relevant working groups and referred to the lists of working group participants that were circulated to PRN members prior to the meeting.

3. Return to office survey

AB referred to the AFB Return to office survey summary that had been sent to PRN members prior to the meeting.

One member noted that the summary revealed some interesting responses and was very useful as a piece of evidence to share with other offices of the firm.

4. MiFID/MAR – European Commission Proposal

AB referred to the European Commission draft proposal on MiFID/MAR.

A member commented that it is unlikely that there will be any equivalence decisions made under MiFID by the end of June as the European Commission is still carrying out its assessments. A member added that in this case firms may have to plan for no equivalence being granted.

Regarding the Market Sounding Regime, one member suggested that the AFB should work with other trade associations with The Investment Association.

One member commented that there are other files such as CSDR, that have been pushed back into 2021 that firms need to start implementing. However, this is difficult for firms to do due to the amount of uncertainty.

5. FCA Market Watch 63 (<https://www.fca.org.uk/publication/newsletters/market-watch-63.pdf>)

AB referred to the recent publication of the FCA Market Watch 63 newsletter on market conduct and transaction reporting issues.

There were no comments from participants.

6. Money Laundering Reporting - Impact of Covid 19/AFB paper

AB highlighted the AFB Money Laundering Reporting summary paper that was distributed prior to the meeting, which focused on the impact of Covid 19 on financial crime control and governance frameworks.

Members did not provide any additional input.

7. DAC 6 – recent developments <https://www.gov.uk/hmrc-internal-manuals/international-exchange-of-information/ieim800000>

AB noted the recent developments and proposals that had been made to DAC 6 by the HMRC and European Commission in light of Covid 19.

Members had no comments.

8. LIBOR Transition – Next Steps following FCA meeting on 11 May

AB updated the group on the next steps for the LIBOR Transition working group following the FCA meeting that took place on 11 May.

One member highlighted the release of the “[Paper on identification of Tough Legacy issues](#)” in relation to LIBOR transition by the Sterling Risk-Free Reference Rates (RFRWG) Tough Legacy Taskforce.

9. The Financial Services Regulatory Initiatives Forum (Grid initiative- more info [here](#))

AB noted The Financial Services Regulatory Initiatives Forum Grid initiative that has been launched to help financial firms prepare for upcoming regulatory work.

There were no comments.

10. UK Government Business Support Measures (specifically CLBILS updates - more info [here](#))

AB highlighted the updates that have been made to the Coronavirus Large Business Interruption Loan Scheme.

11. Brexit – AFB webinars

AB commented that the AFB will be hosting at least one webinar in early July on issues for AFB members as a consequence of the end of the transition period. Invitations will be sent out shortly.