Deficiencies in the Regulatory and Supervisory Practices in Ghana's Financial Sector

Report of the Regulatory and Supervision Sub-committee of the The Financial Sector Consultative Sub-Committee.

May 2000

Sigma One Corporation

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Submitted to:

**U.S. Agency for International Development
Mission to Ghana**

for:

**Trade and Investment Reform Program (TIRP)
Improved Policy Reform and Financial Intermediation
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by:

Sigma One Corporation

In fulfillment of the following milestones:

3.6 Draft Report on the deficiencies in the regulatory and supervisory practices in the financial sector

May 2000 **Sigma One Corporation**

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BACKGROUND

The Financial Sector Consultative Sub-Committee (FSCC) was set up by the Bank of Ghana as part of a larger programme on Trade and Investment Reform overseen by the Inter-Ministerial Committee on Competitiveness (IMCC). t its first meeting FSCC established the following Sub-Committees:

1. The Legal Regulation and Supervision Sub-Committee (LRSSC)
2. The Financial Intermediation Sub-Committee (FISC)

The mandate of LRSCC was to examine the present legal, regulatory and supervisory framework of the financial sector, identify any factors of a legal, regulatory and supervisory nature that inhibit the efficiency and development of the market and propose recommendations for resolving them. The recommendations were to be reported to FSCC for onward transmission to IMCC for consideration, adoption and implementation. The members of the FSCC and its Sub-Committees are in nnex . The Sub-Committee's adopted work plan is attached as nnex B.

The Sub-Committee's work was organized in three stages, each consisting of presentations by categories of stakeholders as follows:

1) **First Stage:** Presentations by regulatory and policy agencies

2) **Second Stage:** Presentations by representatives of regulated institutions

3) **Third Stage:** Presentations by selected stakeholders and service providers to financial institutions.

The deliberations of LRSSC are presented in this report under the following captions:

1) Issues of a general nature that cut across the entire financial sector

2) Legal and operational constraints of regulatory agencies

3) Sectoral Issues

GENERAL ISSUES

CONSULTATIVE PROCESS ON FINANCIAL SECTOR REGULATORY MATTERS

There is a widespread feeling that regulatory agencies need to improve the process of consultation with regulated institutions and other stakeholders of the financial sector. To the extent that there is consultation, it is limited to requests from regulatory agencies to regulated agencies for memoranda on proposed changes. The process does not allow for effective debate and involvement of other major stakeholders such as individual and corporate users of financial services and service providers to financial institutions. Consequently, regulatory reform does not benefit from the widest possible range of experience. Furthermore, the weakness of the consultative process feeds mistrust between regulators and the regulated, with the latter increasingly becoming passive.

The Sub-Committee concluded that there is a need to develop a consultative culture within the financial sector. Presenters from the insurance industry attested to the significant improvement in consultation, which has been achieved through foras convened by the National Insurance Commission during which serious efforts were made to forge a consensus on regulatory matters.

RECOMMEND TIONS

1) Sponsoring regulators should hold open fora on proposed regulatory changes. Such fora should include not only regulated institutions but also individual and corporate users of financial services, service providers (accountants, auditors, consultants, lawyers) and experts who can add value to the process.

2) Open fora should replace reliance on memoranda

3) The major regulatory changes underway, such as the Bank ct, Non Bank Financial Institutions Law, operating guidelines for NBFIs and regulations for collective investment schemes should be subjected to the process.

OUTDATED FINANCIAL LIMITS IN LAWS

Many laws include financial limits such as stated capital, security deposits and penalties that have become outdated because of inflation.

RECOMMEND TIONS

1) Financial limits should be removed from laws

2) Regulatory agencies should be empowered to promulgate limits after consultations with the appropriate ministry and other stakeholders.

OPERATIONAL PROBLEMS OF REGULATORY AGENCIES

The Sub-Committee's deliberations on regulatory agencies uncovered several operational problems, which were identified by both the regulatory agencies and regulated institutions. The key operational issues were as follows:

L CK OF OPER TION L INDEPENDENCE

The Basle Core Principles for Bank Supervision state among others that an effective system of banking supervision will have the following characteristics:

1) Clear responsibilities and objectives for each agency involved in the supervision of banking organizations, with each such agency possessing operational independence sand adequate resources

2) The licensing authority must have the right to set criteria and reject applications for establishments that do not meet the standards set.

There is a widespread perception that regulatory agencies are not independent and are subjected to political pressure in a manner that subverts their profession judgment. The Bank of Ghana Law does not provide adequate autonomy for the central bank to supervise the banking system. The central bank must consult and/or secure the approval of the government in the licensing of banks, adjusting the minimum capital adequacy requirements, initiating action against and taking over distressed banks.

While the criteria for licensing banks have been set out, the criteria for other financial institutions are not transparent. Licensing decisions that widely seen as biased fuel the perception of politicization.

OTHER OPER TION L ISSUES

1) Low budgets and understaffing lead to long reaction times for regulatory

agencies on matters of concern to the industry.

2) Lack of industry experience of staff of regulatory agencies leads to misunderstandings on regulatory issues.

3) Delays in getting regulatory approval of directors nominated for financial institutions. There has been a confusion of "security risk" (as applied by the Ministry of Interior for national security purposes) with suitability for directorship. Candidates are subjected to irrelevant and inappropriate questions that have nothing to do with "fit and proper" criteria for directorship. The delays, and extensive information requirements have deterred many qualified people from serving as directors of financial institutions.

RECOMMEND TIONS

1) The Bank of Ghana law should be revised to enable the central bank to grant and terminate a bank license, change capital adequacy requirements and take serious actions against distressed banks without recourse to and prior approval of government.

2) Government needs to respect the independence of regulator and avoid direct and indirect intervention in the regulatory process. Minimizing discretionary powers of regulatory agencies and emphasizing formal rules and procedures so that regulatory decisions can be seen to be careful, deliberate and unbiased can reinforce this. ll regulatory agencies should establish clear and transparent criteria for licensing of financial institutions.

3) Regulators should make a conscious effort to improve their understanding of financial industry by:

   - ttaching staff to regulated institutions
   - Recruiting from industry

4) Financial autonomy of regulatory agencies should be promoted through adequate charges to regulated organizations and other users of the services of regulatory agencies

5) s resources permit, regulatory agencies should step up computerization of

operations.

6) Vetting of directors should focus on suitability for directorship (e.g. lack of criminal record) not “security”. Questions and forms to be used in conducting security checks for proposed directors should be in line with “best international practice”, that are appropriate for establishing in an efficient and timely manner, whether candidates are fit and proper. Regulatory agencies should maintain a common database of approved and rejected directorship nominees of financial institutions.

REGULATORY COORDINATION

Convergence in financial markets has created financial services firms that operate in several financial sectors. In Ghana, many financial institutions operate across a number of regulatory jurisdictions. For example many banks have brokerage and investment advisory subsidiaries (C L Merchant Bank, Merchant Bank, First tlantic Merchant Bank, Ecobank). Other financial institutions such as CDH Financial Holdings have subsidiaries in discount house operations, brokerage, and investment advisory and insurance services.

Cross-selling of products is developing to a point where a financial institution would be able to sell to the same client banking, brokerage, fund management and insurance services. The current supervisory structure is functional regulation (banking authorities regulate banking subsidiaries, securities regulate securities subsidiaries, etc.). Inadequate coordination or regulation could lead to:

1) Regulatory arbitrage where an operator can run afoul of regulations in one sector and continue to operate in another sector.

2) Cross-subsidization of operations can occur if regulators in the various product areas are unaware of each other's position with respect to a particular regulated institution.

3) Regulators may set rules that conflict with each other if there is inadequate coordination

4) Developmental objectives of regulators may be in conflict. For example the SRC may be promoting the development of capital market risk instruments while the NIC may be restricting their use by insurance companies as investments

5) Duplication of efforts in activities such as the vetting of directors

The Sub-Committee was made aware of the fact that there were several models for regulatory coordination that could be considered. One extreme is the single regulator approach such as the Financial Services uthority (UK) and Financial Services Board (South frica). The presence of an umbrella supervisory body may facilitate the review of the institution as a whole and scrutiny of decision-making policies and internal controls at the highest level. We were also made aware of the Nigerian model where there is a Coordinating Committee of Regulators consisting of bank, insurance and securities industry regulators. The Sub-Committee was of the view that a single-regulator approach is extreme and would require extensive study and preparation to adopt in Ghana. The optimal supervisory structure and should combine the benefits of specialization inherent in the functional approach with some amount of umbrella oversight.

RECOMMEND TIONS

1) permanent National Committee of Financial Sector Regulators consisting of Bank of Ghana (Bank and Non Bank Supervision), National Insurance Commission and the Securities Regulatory Commission should be established.

2) mong others, the Committee should review major regulatory changes for mutual consistency before such changes are passed.

3) The Committee should establish common requirements for directors of financial institutions and oversee an effort to establish a database of directors of all financial institutions so that the long process of vetting of directors can be shortened. Directors who are nominated and already in the common database may then be approved without going through an extensive second vetting.

4) Pending the creation of a directors database information on directors should be shared by regulatory agencies.

REGISTRIES

The registration procedure for charges by way of mortgages is cumbersome. There are no regional facilities for registering legal documents that back financial transactions. In addition search mechanisms in the courts; Registrar-General and Land Registries are slow and cumbersome.

RECOMMEND TIONS

1) Registries should be given financial autonomy so that they can use user charges to upgrade their storage and retrieval technology.

2) n identification system for participants in the financial transactions is needed. The current Social Security Number used by SSNIT has the properties needed to create

an effective tracking system for participants in transactions that have a financial aspect. It is recommended that the Social Security Number be adopted as a universal ID for all financial transactions.

DELAYS IN DEBT RECOVERY

There is too much delay in recovering debt. This state of affairs adds to the cost of credit (reflected in the high spreads that lenders need to stay in business). In the extreme, delays in debt recovery may prevent credit from being extended with consequent negative effects on business investment. Further misallocation of credit might occur with lending being biased towards short-term credits backed by very liquid collateral.

RECOMMEND TIONS

1) Specialized commercial courts should be set up to handle debt recovery

2) djudicating tribunals should be set up to handle dispute settlement in various industries (e.g. insurance, banking brokerage)

OUTDATED LAWS

Key legislation that underpins financial transactions are outdated. They include:

- Companies Code
- Bankruptcy
- Exchange Control ct
- The Banking Law
- Insurance Law
- Financial Institutions (Non Banking) Law
- Bills of Exchange ct

RECOMMEND TIONS

1) programme should be initiated to review these key pieces of legislation.

2) new Companies Code should be in place by the end of year 2002.

NATIONAL INSURANCE COMMISSION

The Sub-Committee was made aware that the National Insurance Commission had made tremendous progress in building a healthy insurance sector. However there are still areas of concern.

1) The composition of the Commission needs to be reviewed. The Commission must be broadened to include a representative of the Ghana Insurance Brokers ssociation.

2) While representatives of the Ghana Insurers ssociation (G.I. .), Insurance Institute of Ghana (I.I.G), Ghana Police Service, Ghana Private Road Transport Union (G.P.R.T.U.) and National Council on Women and Development (NCWD) are provided for on the Commission the appointees serve at the pleasure of the Minister. For effective participation, the representatives of the respective organization should take their seats automatically.

3) The Insurance Law (PNDCL 227, 1989) is outdated and does not cover adequately life and health insurance. specific example is the definition of insurable interest, which does not reflect the peculiarities of our culture.

4) The intervention powers of NIC are inadequate.

5) Offshore insurers are doing business in Ghana the current provision despite the current provision that an insurer or reinsurer shall utilize all available local capacity before recourse to overseas facultative reinsurance. However there are no clear guidelines for enforcing this provision. There is a need to set up National Retention limit for all classes of insurance keeping in view the prudence of national assets which international reinsurance provides.

6) The legal requirement for a minimum of 40% Ghanaian participation in insurance companies is of questionable merit. This is view of the fact that Ghanaians may not be able to invest adequately to meet higher stated capital requirements.

RECOMMEND TIONS:

1. comprehensive review of the Insurance Law should be undertaken.

BANK OF GHANA

The Bank of Ghana faces operational constraints resulting from:

1) Inadequate human resource capacity for effective supervision. The effect of this is that there is a blacklog of bank examinations. The need for additional investment in human resource capacity is more pressing considering that it takes five years (5yrs) to develop a bank examiner.

2) There is lack of library access to up-to-date resource materials.

3) There is lack of global limits on how much any one borrower can borrow from the banking system as a whole. Systematic risk is increased if the banking system as a whole is excessively exposed to a single borrower.

RECOMMEND TION

1) Strengthen human resource capacity of Bank of Ghana

2) The Bank of Ghana should establish global limits for single borrowers as well as an enforcement mechanism.

REGISTRAR-GENERAL

1) The Registrar-General's Department is constrained by lack of responsiveness of business legislation to the changing needs of the financial sector. For example the Companies Code, 1963 has not been reviewed since its passage thirty-six years ago.

2) The Registrar-General's Department serves as the depository for incorporation records and annual returns of companies. However, the technology for storage and retrieval of records is woefully inadequate. Search times are long and often records cannot be traced.

3) There is no enforcement of the provisions of the Companies' Code. Sanctions against noncompliance are not applied. Part of the reason for non enforcement

lies in weak logistics. However, in some cases the only recourse the Registrar-General may have is to go to court.

RECOMMEND TION

1) Comprehensive review of the Companies Code should be initiated with a view to having a new Companies Code in place by the end of year 2002.

2) process should be initiated to make the Registrar-General's department financially autonomous within two years. The process would enable the agency to fund service improvements through reliance on its own revenues from user charges rather than the Consolidated Fund.

3) Fees charged by the Registrar-General's department should be reviewed to ensure that they are adequate to support and improve operations.

MINISTRY OF FINANCE

The Ministry of Finance is not able to keep up the pace of financial reform.

RECOMMEND TION

Strengthen institutional capacity of the Ministry of Finance.

INSURANCE

1) The Insurance Law PNDCL 227, 1989 as amended still leaves monopoly in favour of state companies. This has become anachronistic given that there are now Ghanaian privately owned insurance and reinsurance companies.

2) The Commissioner's power to approve investments is restrictive. Under PNDCL 227, investment of insurance funds is restricted as follows:

Life Insurance

a). 50% in government securities
b). 50% in such investments as may be approved by the Commission.

Non-Life Insurance

a). 25% in Government Securities
b). 75% in such other investments as Commission may approve.

The power to approve investments, as currently expressed legally, can be counterproductive by preventing an insurance company from taking timely and prudent investment decisions.

BANKING

1) The definition of "banking' in PNDCL 225 is becoming ambiguous given the changes in the financial sector. In terms of actual activities, the distinction between merchant banks and commercial banks has disappeared. Other deposit based on institutions such as savings and loans companies compete effectively with smaller banks in the same markets. Regulatory specialization needs, suggest that it may be more efficient to bring all deposit institutions under one regulatory umbrella.

2) There is an inconsistency in the rules relating to the payment for goods and

services in foreign currency in Ghana and the operation of foreign currency accounts. The Bank of Ghana has on several occasions reminded the public that under Bank of Ghana Law 1992, PNDCL 291 and the Exchange Control ct 1961 (ct 71) and Exchange Control (mendment Law), 1986 PNDCL 149, it is illegal for residents in Ghana to accept payment in Ghana for services rendered or for the sale of goods or property by him or as rent in respect of any property owned by him. t the same time the Bank of Ghana has legalized the operation of two types of foreign accounts that can be held as current accounts in local banks. These are Foreign Currency ccounts and Foreign Exchange ccounts. The former is an account to hold foreign remittances only and is credited with funds from foreign sources only. The latter account is for foreign currency sourced from within Ghana and such funds are not supposed to be readily transferable outside Ghana. Both accounts may however be operated as transaction balances with cheque writing privileges. Cheques negotiable in Ghana are used to effect payment in foreign currency.

RECOMMEND TION

1) Bank of Ghana should review coverage of banking under to cover expanding banking sector.

2) Deposit taking institutions under NBFI regulation should be brought under banking supervision.

3) There is a need to reconcile the inconsistencies in the policy on the settlement of transactions in Ghana in foreign currency and the operation of local foreign exchange accounts.

NON BANK FINANCIAL INSTITUTIONS (NBFIS)

Statutorily, NBFI's in Ghana are covered by the Financial Institutions (Non-Banking) Law, PNDCL 328, 1993, which identifies nine specific types of NBFI's: Discount Houses, Finance Houses, cceptance Houses, Building Societies, Leasing and Hire Purchase Companies, Ventures Capital Funding Companies, Mortgage Financing Companies, Savings and Loan Companies an

The key features of the NBFI Law are as follows:

1) BOG is the designated licensing and regulating agency for NBFIs' with executive powers to prescribe rules and regulations for general or specific application

2) Capital Requirements: Minimum NBFI capital requirements are set at ¢100 million

3) Prudential Regulations: The Minimum capital adequacy ratio is set at 10 percent of risk assets and the Bank of Ghana (BOG) has the power to prescribe the minimum level of liquid assets. Exposure limits are set at 15 percent of new worth for secured advanced and 10 percent for unsecured advances.

4) NBFI's can invite deposits from the general public, but only for fixed periods. NBFIs cannot offer checking deposit facilities.

Reporting requirements under the law includes:

- Notification of the Bank of Ghana on changes in principal place of business within 21 days of such change
- Bank of Ghana approval for a change of name
- Filing of changes in regulations and directors
- Quarterly returns fled with the Bank of Ghana
- Submission of audited accounts to Bank of Ghana

In their presentations to the Sub-Committee, capital firms and leasing and hire purchase companies.

RECOMMEND TION

1) Review schedule to NBFI law

2) Review reporting requirements to ensure that all filings are necessary.

THE SECURITIES INDUSTRY

The Ghana Stock Exchange started with 3 licensed Dealing Members in 1990. Currently, it has 12 Licensed Dealing Members (LDMs). By any standard, this has been a rapidly growing industry. Unfortunately, the growth has been uneven. Only a handful of firms have has a significant impact on the market. The record of the industry indicates the following:

- The Exchange has 22 listings of equities and four corporate bonds

- The last IPO occurred in July 1999. Prior to that there had been no public issue for 2 years.

- Of the 9 IPOs the placements 5 did not realize the targeted amount of funds. further analysis of the IPOs indicated that the actual amount of fresh capital raised is relatively insignificant. In many cases such as GC and Ghana Commercial Bank, the IPOs involved an offloading of shares held by the government with relatively little capital going to the companies involved for real investment. For GCB, the IPO involved a divestment of 60% of Government ownership while the SSB flotation was a divestment of 60% of shares held by SNNIT. Since the GSE started operations, the total value of new listings has been ¢151.4 billion. Of this amount, only 30% represented fresh capital raised for business investment – an indication of a relatively weak intermediation by the investment banking industry. The capital raised by companies for investment in the economy indicating that there is much to do to build a vibrant investment banking industry in Ghana with a significant economic role.

- Latest brokerage markets share statistics indicate that the top 3 firms do 50% of market volumes. In fact the top two firms do about 45% of the market.

- Only about 4 LDMs have research departments with the number of analysts being the region of a total of 10;

- Only 5 firms have either led or co-managed a new issue. These are NTHC, Databank, Merban, Strategic frican Securities, EBG Stockbrokers, and CDH Securities.
- Only one equity IPO has been fully underwritten.

Key issues in the securities industry are:

1) Need to increase listings through government incentives. This could take the form of a lower corporate tax rate for listed companies or a generous first year tax deduction for initial public offers. There were concerns raised about the possibility that other groups of firms may line up for special tax incentives as well. For this reason some preferred a one-time tax allowance for IPO costs.

2) There is an asymmetry in the tax treatment of investment income. While interest income is tax-exempt dividends at taxed at a withholding rate of 10%.

3) The market lacks pooled investment schemes, which could be attractive to small investors who would like to participate in a diversified and well-managed fund.

4) lthough non-resident investors can deal in securities listed on the exchange without obtaining prior exchange control permission, there are some restrictions on portfolio investors not resident in Ghana. The current limits on all types of non-resident investor holdings (be they institutional or individual) are as follows: a single investor (i.e. one who is not a Ghanaian and who lives outside the country) is allowed to hold up to 10% of every company's shares. Secondly, for every listed company, foreign investors may hold up to a cumulative total of 74 % (in special circumstances, this limit may be waived). The limit excluded trades in shanti Goldfield shares and soon to be listed Produce Buying Company.

5) The Securities Industry Law lags behind developments in the industry. For example the SIL does recognize derivatives directly. Derivatives can only be brought under the law if the Minister of Finance declared them as securities by notice in the gazette. n opportunity to broaden the definition of securities in line with market trends was lost in the current amendments to the law before Parliament. In much the same style of lagging the market, the proposed Unit Trusts and Mutual Fund Regulations prohibit investments in futures contracts

by a mutual fund or unit trust. nother prohibition that does not reflect modern market practice is the prohibition of short selling.

RECOMMEND TIONS

1) Provide a one-time incentive to companies that list on the stock exchange through a generous tax allowance for IPO floatation costs.

2) Level playing field on taxation by exempting dividends from tax.

3) Pursue rapid passage of amendments to SIL

4) Bank of Ghana should repeal restrictions on foreign participation in Ghana's stock market.

5) The SRC needs to strike a proper balance between market development and regulation. In general, outright prohibitions should be avoided as they stifle financial innovation. The law should be flexible to allow introduction of new instruments. The process can be managed by imposing rules on use of new instruments for prudential reasons and for investor protection.

SSNIT

The pension fund as a financial intermediary exists to bridge the gap between rising desired expenditures for most, following retirement and the abrupt decline in income at retirement. This gap is closed, at least partially, by the accumulation of funds (savings) during the working years of an individual's lifetime (through both employer and employee contributions) and the investment of those funds in a portfolio of financial assets (stocks and bonds) and sometimes in real assets (such as real estate). With large contributions from participants in the early years and with relatively few retirees to draw the funds out, pension funds can grow at an enormous rate at the early stages. With such a rapid growth, large pension funds invest heavily in the capital markets, thus transferring the retirement savings of individuals to business and governments for real investment. The pension fund has one of the most stable sources of funds of all financial intermediaries. Inflows and outflows are highly predictable. The extreme stability of sources of funds, coupled with the fact that a pension fund's time horizon is very long means that pension funds are not active in short-term investments. Most investments are in capital market instruments.

There are no private pension schemes in Ghana. There is a mandatory contribution of 17.5% of salary to the Social Security and National Insurance Trust (SSNIT), 12% by the employer and 5% by the employee. SSNIT is a statutory body governed by the 1991 Social Security Law. It is charged with the responsibility for collecting social security and making social security payments.

SSNIT's investments are mainly in Government of Ghana Treasury Bills and Bonds and real estate. Investments in private sector companies and shares listed on the Ghana Stock Exchange are a relatively small proportion of SSNIT assets. Thus despite being the largest single source of long-term contractual savings in Ghana, SSNIT has not been able to significantly increase the supply of long-term capital to the private sector.

While SSNIT has not done much to stimulate securities markets, it has been instrumental in promoting several new financial institutions such as Home Finance Company, Ghana Ventures Capital Fund, Export Finance Company, and Securities Discount House. By purchasing long-term bonds indexed to inflation, SSNIT has assisted Home Finance in securing a long-term source of funds for mortgage lending.

The dominant position of SSNIT and the absence of a tax-deductible status for private pensions has deterred the emergence of private pension funds and stifled competition in the sector that could have improved savings mobilization. Because SSNIT contribution is mandatory, it does not have to actively compete for members and has earned low returns and sustained high operating costs.

The benefits of private pension plans are as follows:

- They induce increased savings by workers
- They create a solid base of domestic institutional investors
- They channel fund contributions into private investment by taking positions in the equity and long-term debts issues of private sector firms

RECOMMEND TIONS

1) The government should accelerate the introduction supplementary pensions such as:

- Group supplementary plans
- Individual supplementary plans

2) The tax laws should be amended to provide equal treatment for supplementary pension schemes, with tax-deductible contributions up to a maximum of 25% of earnings, 17.5% of which would go to SSNIT

n appropriate regulatory framework must be established to cover their operations.

CREDIT REFERENCE AGENCY

While plans seem to be far advanced for the establishment of a Credit Reference gency, the laws are vague on whether the information needed to operate the Credit Reference gency can be divulged. There is a need to clarify the law and establish an appropriate legal framework.

RECOMMEND TION

Review legal framework as regards to the establishment and operating of credit reference agencies.

ANNEX A

FINANCIAL SECTOR CONSULTATIVE COMMITTEE

1. Teresa Ntim (Mrs.), Bank of Ghana, Chairperson
2. Kwame boagye, SEM Financial Group Limited
3. William dote, Ministry of Finance
4. Yeboa moa, Ghana Stock Exchange
5. Felix Y. Biga,SSNIT
6. Jesse Clottey, Private Enterprise Foundation
7. Nyamikeh Kyiamah (Mrs.), Deputy Commissioner, National Insurance Commission
8. D.K Mensah, Ghana ssociation of Bankers
9. Fred Nuer, ssociation of Stockbrokers
10. Mark Owusuansah, Ministry of Finance
11. Eudora Quartey, Securities Regulatory Commission
12. Jay Salkin, Sigma One Corporation
13. Nii Kwaku Sowa, Centre for Policy nalysis
14. Wilson Tei, Ghana Insurers ssociation

LEG L, REGUL TORY ND SUPERVISORY SUB-COMMITTEE

1. Jacob rko Saah, Registrar-General's Department (Chairman)
2. Mahmoud Hantour, Ghana ssociation of Bankers
3. Eudora Quartey, Securities Regulatory Commission
4. Joe boagye Debrah, Ghana Stock Exchange
5. Jay Salkin, Sigma One Corporation
6. Wilson Tei, Ghana Insurers ssociation
7. Charles Obeng Inkoom, Chartered Institute of Bankers
8. Jojo cquah, Deloitte & Touche
9. Paul simenu, Ministry of Finance
10. Emma Ocran (Mrs.), National Insurance Commission
11. du . ntwi, Securities Regulatory Commission
12. Daniel O.K. Owusu, Bank of Ghana
13. Kofi moa- wuah, Bank of Ghana
14. Fred Nuer, ssociation of Stockbrokers
15. Tony Osei, Centre for Policy nalysis

FIN   NCI   L INTERMEDI   TION SUB-COMMITTEE

1. Kwame   boagye, SEM Financial Group Limited
2. Felix Y. Biga, SSNIT
3. Fred Nuer,   ssociation of Stockbrokers
4. Mark Owusuansah, Ministry of Finance
5. Jay Salkin, Sigma One Corporation
6. Nii Kwaku Sowa, Centre for Policy   nalysis
7. Wilson Tei, Ghana Insurers   ssociation
8. I. Owusu Hemeng, Chartered Institute of Bankers
9. J.K. Forson, Deloitte & Touche
10. Ekow   fedzie, Ghana Stock Exchange
11.   braham K. Boateng, National Insurance Commission
12. Bertha Smith (Ms.), Bank of Ghana

ANNEX B: WORK PLAN OF THE LEGAL, REGULATORY AND SUPERVISORY SUB-COMMITTEE

Activity	Time Frame
1. **First Stage**	
Presentations by representatives Regulatory and Policy gencies Identified as; • Bank of Ghana • Securities Regulatory Commission • National Insurance Commission • Registrar-General's Department • Ministry of Finance	February 2 -February 18
First Interim Report	February 21
2. **Second Stage**	
Presentations by representatives of regulated institutions Identifies as; • Ghana ssociation of Bankers • Insurance Companies • ssociation on Non-Bank Financial Institutions • Micro-finance organizations (Micro Finance Network) • Ghana Stock Exchange • ssociation of Stockbrokers	February 23 - February 29
Second Interim Report	March 1
THIRD ST GE	

<table>
<tr><td>Presentations by selected stakeholders and service providers to Financial Institutions Identified as:
SSNIT
Ghana Reinsurance (Institutional Investor)
2 Individual investors
2 Insured
1 Individual Depositor
1 Individual Borrower
1 Corporate Borrower
The Bar ssociation/The Judiciary
Institute of Chartered ccountants
1 ccounting Firm
l Law Firm-Bentsi-Enchil, Letsa and Mate
Mr. Kojo Graham (Securities Lawyer)
Mr. Gyampo
Mr. ning
Mr. wuah</td><td>March 2-March 8</td></tr>
<tr><td>Third Interim Report</td><td>March 10</td></tr>
<tr><td>4. Fourth Stage</td><td></td></tr>
<tr><td>Presentation by Chief Executives of
Bank of Ghana
National Insurance Commission
Securities Regulatory Commission
Registrar General’s Department
on how to achieve better regulatory cohesion</td><td>March 13-March 17</td></tr>
<tr><td>Fourth Interim Report</td><td>March 20</td></tr>
<tr><td>5. Comprehensive Report to FSCC</td><td>March 30</td></tr>
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