



National Bank of the
Republic of North
Macedonia



European Fund for
Southeast Europe

Fintech Strategy for Financial Regulators, 2023 – 2027

Harnessing the Opportunities and Benefits of Technological Innovation in the Financial System

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Introduction

Technological innovations in the field of finance, or "fintech", are a powerful driver of economic growth and have enormous potential to transform the financial services. The acronym fintech, like many other examples of generic terms, can have different meanings depending on the context. It can refer to start-ups or established companies operating in the financial sector and companies that have business models based on innovative technologies. The term "fintech" can also refer to the technologies themselves, whether they are being deployed by new companies or are being explored by traditional market participants such as banks¹.

Recognizing the potential of fintech, the [National Bank of the Republic of North Macedonia](#) (hereinafter referred to as: the National Bank) in 2018 initiated the project to lay the foundations for the transformation of the financial system in the Republic of North Macedonia (hereinafter: the RNM), led by fintech. The project was implemented through the [European Fund for Southeast Europe](#) (hereinafter: the EFSE) which provided financial support and expertise.

The project activities started in 2018 by strengthening the capacity and awareness of the employees of the National Bank about the importance of innovations in financial services. Following the example of other central banks, the National Bank in 2019 established a Working Group for Financial Technologies with experts from different organizational units within the Bank. By the end of 2019, the working group created the [Innovation Gateway](#), as a platform for communication with the innovative business community (hereinafter referred to as: the fintech sector) and providing guidance on regulatory matters. During that period, the National Bank and the Ministry of Finance were actively involved in harmonizing the regulation on payment services and payment systems, with the EU's PSD2 directives, EMD2, PAD, SFD, IFR and some provisions of the SEPA regulation².

Towards the end of 2019, all financial regulators in the RNM³ (hereinafter referred to as: regulators) confirmed the need for the development of fintech in the RNM and agreed to adopt a National Fintech Strategy in the future, if it proves to be feasible. However, they believed that before starting the preparation of the National Fintech Strategy, the ecosystem should be mapped, the initiatives undertaken by all stakeholders should be identified, the benefits of the

¹ According to the Financial Stability Board, the term "fintech" is defined as: "technologically enabled financial innovation that can lead to new business models, applications, processes or products with an accompanying material effect on financial markets and institutions and the provision of financial services".

² The **Law on Payment Services and Payment Systems** is compliant with the Directive 32015L2366 of the European Parliament and of the Council of the European Union on payment services in the internal market (CELEX No. 32015L2366), Directive 32009L0110 of the European Parliament and of the Council of the European Union on electronic money (CELEX No. 32009L0110), Directive 01998L0026-20190627 of the European Parliament and of the Council on settlement finality in payment and securities settlement systems (CELEX No. 01998L0026-20190627), Directive 32014L0092 of the European Parliament and of the Council on comparability of fees relating to payment accounts, payment accounts switching and access to payment accounts with basic features (CELEX No. 32014L0092), Regulation 32015R0751 of the European Parliament and of the Council of the European Union on interchange fees for card-based payment transactions (CELEX No. 32015R0751) and Regulation 02012R0260-20140131 of the European Parliament and of the Council of the European Union establishing technical and business requirements for credit transfers and direct debits in euro (CELEX No. 02012R0260-20140131).

³ The National Bank of the Republic of North Macedonia, the Ministry of Finance, the Securities and Exchange Commission, the Insurance Supervision Agency and the Agency for Supervision of Fully Funded Pension Insurance.

fintech development in the country should be identified and potential obstacles to the development of the financial services market should be perceived.

For this purpose, a comprehensive research of the ecosystem was undertaken and during October 2020, a Survey was conducted. In the Survey, 220 respondents from different segments across the ecosystem took part, with the majority of them (90%) confirming the need for the transformation of the financial system in the RNM, led by fintech. Findings from the Survey showed that fintech brings significant benefits to consumers and small businesses. Modernization and harmonization of the financial system with the best international practices can help the RNM in the EU integration process. Fintech also tends to increase financial inclusion. The research also highlighted the key risks, challenges, and regulatory obstacles that limit the development of the financial services market. Based on the results of the survey, a [Study for assessing the possibilities for introducing fintech in the RNM](#) was prepared.

In July 2021, a decision was taken the project with the EFSE to continue for the purpose of developing a Fintech Strategy for the RNM (hereinafter referred to as: National Fintech Strategy). The project was once again initiated by the National Bank, which provided coordination and consultative meetings with stakeholders from the fintech ecosystem, directed the activities and contributed to the preparation of all documents.

In order to ensure the independence of the regulators and the appropriate separation of the activities, goals, and interests of the regulators from those of the other stakeholders, two strategic documents were prepared which together constitute the National Fintech Strategy:

- 1) Fintech Strategy for the Financial Regulators (hereinafter referred to as: Fintech Strategy for the Regulators), and
- 2) Strategy for Fintech Innovations and Entrepreneurship (hereinafter referred to as: Strategy for Fintech Entrepreneurs).

The National Fintech Strategy is the final step of the activities of the EFSE project for laying the foundations for the Fintech-led transformation of the financial system in the RNM. The National FinTech Strategy is a strategic document based on the premise that the Fintech-led transformation of the financial system in the RNM, could not succeed without a coordinated approach of all stakeholders in the ecosystem.

I. Fintech Strategy for the Regulators

The Fintech Strategy for the Regulators addresses the regulatory aspects related to the Fintech-led transformation of the financial system in the RNM. This section contains the recommended actions for the regulators and provides an overview of the governance framework in place, which ensures a coordinated approach by regulators and an appropriate mechanism for overseeing the implementation of the recommendations of the Fintech Strategy for the Regulators.

1. Motivation for implementation of the Fintech Strategy for the Regulators

The benefits of the development of fintech are multiple, which is why they represent an incentive to take actions to implement a transformation of the financial system, led by financial technologies. According to the Report of the EU Expert Group on Regulatory Obstacles to Financial Innovation (ROFIEG)⁴, the development of innovation in the sphere of finance can bring four benefits:

1. Market participants can offer financial services at a lower price;
2. Market participants can develop a wider range of products and services, thereby expanding choice for consumers and companies, and thereby potentially providing better financing opportunities;
3. Certain products or services may be brought closer to consumers or companies;
4. Financial technologies can be used to achieve more efficient regulation and compliance with the best international practices.

However, the ROFIEG emphasizes that the benefits of fintech cannot be fully realized if the regulatory framework is unclear, fragmented or absent. In Europe, the ROFIEG is of the view that harmonization and clarification of regulation and supervisory measures will provide an effective tool to support the development of financial innovation in the EU.

International experience shows that financial services markets deepen with increasing regulatory certainty. Hence, regulatory certainty encourages entrepreneurs to market their ventures or products and provides them with confidence. Similarly, investors are more willing to finance innovative ideas when the risk of regulatory uncertainty is removed or is negligible. At the same time, companies are more willing to cooperate with fintech startups, if they are formally regulated and consumer rights are protected.

Regulatory hurdles can prevent certain innovative ideas from reaching the market. Therefore, regulatory intervention that leads to the determination of obstacles and the removal or mitigation of extensive regulatory requirements for fintech startups, which are at an early stage of their development and do not have financial resources, is an important prerequisite in the evolution of a fintech market. The flexibility and openness to change in the regulatory environment indicates that regulatory barriers will be removed in order to encourage innovation and that regulators are providing support for innovators and early-stage companies.

⁴ European Commission Expert Group on Regulatory Obstacles to Financial Innovation (ROFIEG): "[30 Recommendations on Regulation, Innovation and Finance](#)", December 2019, page 10.

[Study for assessing the possibilities for introducing fintech in the RNM](#) points to similar benefits as those mentioned in the ROFIEG Report, but also to some others. More specifically, in the case of the RNM, the Survey respondents point to the following benefits from the introduction of financial technologies:

- Modernization of the financial system according to new trends, as well as modernization of legislation;
- Greater choice, more benefits and the ability to better manage personal finances through the use of digital channels;
- Harmonization of the financial system of the RNM with the best international practices, through which the desired integration of the country with the EU becomes more certain;
- Improving the efficiency of the financial system, with the possibility of converting lower costs into cheaper financial products;
- Increasing access to finance for individuals and small businesses that are not effectively served by traditional financial institutions;
- Increased competition in the financial system (by allowing the entry of new market participants) which can bring greater choice and better opportunities for customers.

According to the answers of the different groups of respondents who participated in the Survey, regulation is one of the most significant challenges for innovators in financial services. Without regulatory certainty, innovators are often reluctant to bring new products and services to the market. The Survey showed that the current regulation is not in line with some of the new business models in the field of finance, such as lending money to individuals or companies that connect lenders with borrowers through online services, crowdfunding platforms, or service providers for initiating payments from third parties (this business model could evolve with the start of the enforcement of the new [Law on Payment Services and Payment Systems](#)).

Innovators express a desire for greater openness and support from regulators, which will increase confidence in them and support them in the process of creating innovations in the financial services market.

Regulators in the RNM agree that fintech can stimulate competition, thereby improving the level of quality of financial services and providing greater and simpler access to finance. The National Bank, through the Innovation Gateway, receives questions from interested parties from the country and abroad, who are looking for regulatory guidelines for licensing. Regulators also support the establishment of an environment for testing the functionality of new business ideas/innovative solutions in the field of finance before their introduction to the financial services market (hereinafter referred to as: Regulatory Sandbox). The Regulatory Sandbox also offers an opportunity to understand the new business models coming to the market of financial services and the way of their regulation.

2. Vision for the fintech development from the regulatory perspective

The Fintech Strategy for the Regulators has the following vision:

1. Flexibility and openness for changing the regulatory framework in order to encourage competition in the interest of consumers and the financial system;
2. Encouraging innovations in the financial system, in the interest of individuals and companies, by determining and removing regulatory obstacles;
3. Increasing the resilience and stability of the financial system. Using innovative fintech solutions to achieve higher operational efficiency, better risk management and better regulatory compliance of financial institutions.

3. Strategic goals and action plans for achieving the fintech vision of the regulators

Achieving the vision of Fintech-led transformation of the financial system, from the regulators' perspective, entails implementing multiple recommendations with detailed action plans.

- 1. Creating a regulatory environment for banks and other financial service providers in the RNM** which is conducive to innovation, entrepreneurship, and competition in the interest of financial inclusion and financial stability.
 - a. Development of a Cross-Regulatory Innovation Hub.
- 2. Creating an environment for testing innovative solutions before introducing them to the financial services market (Regulatory Sandbox).** Some innovative business models may not be covered by the current regulatory framework, so they could be tested in a controlled environment, under supervision and without regulatory sanctions.
 - a. Development of a Cross-Regulatory Sandbox, as a tool for testing the functionality of innovative solutions in a controlled regulatory environment.
- 3. Regional and international regulatory cooperation.** Encouraging cooperation with other regulators from the region, as well as with relevant international institutions, is aimed at accelerating the development of financial innovations through the exchange of ideas and facilitating the possibility of exit of domestic fintech companies to larger markets outside the country (cross-border expansion).
 - a. Encouraging formal and informal regional and international cooperation agreements.
- 4. Realignment of regulatory organization to address fintech,** without compromising the performance of their key functions, including supervisory competences.
 - a. Regulators review and re-align their organization to be able to engage with fintech innovators positively and with adequate capacity, while ensuring that existing operations are not at risk.

- 5. Regulatory capacity building.** Regulators have adequate knowledge and capacity to support fintech.
 - a. Regulators develop and implement regulatory capacity building programs and trainings to upskill their organization on Fintech matters.
- 6. Bespoke financial services consumers protection framework.** The Financial Services Consumer Protection Framework ensures certainty for consumers when using innovative digital products and services.
 - a. Assessment of the possibility of adapting the regulatory framework for consumer protection for new financial services based on fintech.
 - b. Assessment of the possibility of establishing a Financial Services Ombudsman's Office.
- 7. Assessment of regulatory obstacles** - To determine and re-evaluate the justification of the existence of regulatory requirements, which are limiting for the development of fintech entities in the early stage of their development.
 - a. Regulators assess regulatory obstacles to the development of fintech and devise strategies to reduce regulatory requirements or inconsistencies in the regulatory framework.
- 8. Proactive approach of regulators regarding the emergence of new business models.** Regulators need to be aware of the new Fintech business models so that they can adapt the regulatory approach to such innovative ideas and accelerate Fintech-led changes.
 - a. Regulators can, through research and collaboration with other regulators, identify and understand new fintech business models and that are likely to emerge in the RNM. Accordingly, they can proactively amend the regulatory framework to ensure the conditions for the emergence of these business models in the market.
- 9. Assessment of risks from financial technologies.** In addition to supporting competition and innovation, the activities of regulators should be aimed at timely and comprehensive recognition and assessment of the risks of the impact of fintech on the stability of the financial system and consumer protection.
 - a. Regulators conduct comprehensive risk assessments on a regular basis to assess the impact of a more open regulatory environment on innovation and competition driven by financial technology.
- 10. Ensuring regulatory clarity and consistency in the enforcement of laws and other regulations that have an impact on the development of financial technologies.** It is expected that the clear regulation will stimulate the dynamics of the development of digital financial services and fintech products.
 - a. Regulators provide appropriate regulatory guidelines that will enable the correct, clear and consistent application of certain legal and by-law provisions that have an impact on the development of financial technologies.

11. A post-pandemic report for determining the challenges and understanding the opportunities offered by the development of the fintech sector. The COVID-19 pandemic has highlighted the existence of certain obstacles for the development of digital financial services. By assessing the impact of the pandemic on the development of digital financial services, the obstacles, as well as the opportunities for the development of innovative solutions in the field of finance, should be identified.

- a. Regulators prepare a post-pandemic assessment report on the impact of the COVID-19 pandemic to identify opportunities to accelerate Fintech and digital financial services.

12. Removal of barriers for non-bank payment institutions. Non-bank payment service providers should not face regulatory, commercial or operational challenges, which prevent the introduction of innovative and cost-effective payment solutions, in the interest of consumers, small businesses and e-merchants. Removing barriers is a prerequisite for more payment service providers to enter the market.

- a. The National Bank will assess the practical and regulatory obstacles that exist for non-bank payment providers after the implementation of the new payment regulatory framework and assess the need to overcome them.

13. Quick and simple switch of consumer payment accounts from traditional financial institutions to new fintech entities. The quick and easy procedure will allow a better user experience for customers, more choice and lower prices of financial services.

- a. Regulators should identify obstacles to easier switch of customer accounts (for example, administrative obstacles preventing a customer from switching accounts) and take appropriate actions to overcome them.

14. Engagement of regulators with the fintech community. Regulators are engaging with the fintech community to better understand innovation and the fintech startup environment. In this way, regulators better address the market needs and take a proactive stance towards regulatory changes, to adapt to new innovative fintech business models, fintech products or services.

- a. Establishing a forum for communication with the fintech community, associations, investors, educational institutions, technology service providers;
- b. Regulators define plans with specific activities for regular cooperation with the fintech community.

15. Plans for dealing with the fintech companies if they fail or exit the market (wind down plans). The plans aim to minimize harm to consumers, limit the risk of contagion in the fintech sector and limit the negative effects on the overall financial sector, should a startup or startup product end up failing.

- a. Regulators should consider introducing a regulatory requirement to develop plans for the orderly dealing with the fintech companies if they fail or exit the market. These

plans would be considered in the procedure for their licensing and their subsequent supervisory assessment would be carried out.

16. Open Finance - The regulation makes it easier for financial institutions to open up customer data (with their consent) to licensed third parties that provide value-added services and allow consumers and businesses to better manage their finances or conduct transactions efficiently.

- a. Regulators and competent ministries from the Government of the RNM should examine the possibility of developing a regulatory and business framework for open finance.

17. Efficient and effective regulators using technology. Regulators are more effective and efficient by using technological solutions and can improve the supervision of the institutions in the financial system.

- a. Regulators are exploring how to improve efficiency and effectiveness by adopting technological solutions such as Suptech and Regtech.

18. Regulators understand the implications of the launch of a Central Bank Digital Currency (CBDC) for the fintech sector. Accordingly, they define the necessary strategies in order to take advantage of the opportunities and mitigate the risks of introducing a central bank digital currency.

- a. The opportunities, challenges and impact of a central bank digital currency (CBDC) on the development of the fintech sector are clear and understood.

4. Coordinated approach of the regulators for implementation of the Fintech Strategy for the Regulators

In order to support the development of innovations in financial services in the country, a coordinated approach by the regulatory authorities of the financial system - the regulators is needed. Hence, the regulators responsible for the individual segments of the financial system: the National Bank of the Republic of North Macedonia (NBRNM), the Ministry of Finance (MF), the Securities and Exchange Commission (SEC), the Insurance Supervision Agency (ISA) and the Agency for Supervision of Fully Funded Pension Insurance (MAPAS) in March 2022 signed a Memorandum of Understanding to create conditions to support the development of innovations in the financial system in the RNM.

The main objective of the Memorandum is to provide conditions to support innovation, competitiveness and access to finance, while taking into account the protection of consumers and investors and the protection of the financial system as a whole. The cooperation that is established with the signing of the Memorandum refers to the development and implementation of the recommendations that are under the jurisdiction of the regulators, and which will be an integral part of the National Fintech Strategy.

One of the basic mechanisms for cooperation of the regulators in the process of communication with the fintech sector is the establishment of a joint Innovation Hub and Regulatory Sandbox. The document with detailed fintech recommendations for regulators contains a detailed

elaboration of these two communication mechanisms with the fintech sector, which have a high priority in the implementation.

The cooperation of the regulators offers several advantages:

- **A simpler and more efficient licensing process for new participants in the financial market.** Before proceeding with the formal submission of a licensing request to the competent regulator, interested entities may contact the Innovation Hub and provide the necessary information related to the documentation and licensing procedure. Often, complex regulation and complex licensing procedures are a complicating factor when starting a new business, especially for startups. The role of the joint Cross-Regulatory Innovation Hub is to facilitate the entry of new entities, by providing legally non-binding advice and to direct interested entities to the competent regulators and other institutions, if necessary. The importance of joint cooperation and coordination between regulators is particularly visible when the business model of a certain entity is subject to regulation and licensing by several regulators.
- **Convergence of supervisory practices and improvement of the capacity of regulators.** Each regulator may be at a different level of development with a different level of capacity and knowledge. Hence, innovations are directly conditioned by the capacity of the regulator, that is, the willingness and ability to engage with innovative fintech entities. The cooperation of the regulators through the joint Innovation Hub and the Regulatory Sandbox will enable convergence of supervisory practices and unification of the level of development of the regulators.

5. Governance framework and steering mechanism for the implementation of the recommended actions for the regulators

The basis of the coordinated approach of the financial regulators for the efficient implementation of the recommendations from the Strategy is the **Memorandum of Understanding for the creation of conditions to support the development of innovations in the financial system in the RNM.**

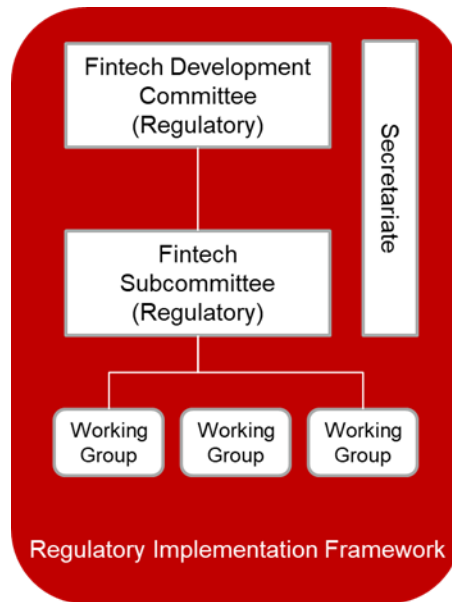
By signing the Memorandum, the regulators undertake specific commitments for appropriate and timely implementation of the recommendations established by the Strategy, in order to ensure conditions for supporting innovation, competitiveness and access to finance, while taking into account the protection of consumers and investors and the protection of the financial system as a whole.

For this purpose, an appropriate governance and organizational structure has been established at the level of the regulators, which includes the establishment of:

1. Committee for support of the development of fintech in the RNM – **Fintech Committee**, as the main inter-institutional coordinating and supervisory body for adopting and approving the recommendations of the Strategy. The Fintech Committee provides

guidance and recommendations to other bodies and working groups, collaborates and exchanges information with all stakeholders in the country and international bodies and organizations, assesses risks related to the development and application of financial technologies, including risks to consumers and investors and proposes activities to mitigate and/or prevent those risks. The highest representatives from each regulator participate in the work of the Fintech Committee, and its work is governed by the Memorandum of Understanding and the corresponding Rules of Procedure.

2. Subcommittee for support in implementing the recommendations from the Strategy - **Subcommittee**, which on behalf of the Fintech Committee takes care of the operational implementation of this strategy as a whole and regular reporting on the progress achieved. This Subcommittee develops a detailed plan for the implementation of the recommendations from the Strategy, with an appropriate time frame for their implementation, assessment of the possible ways to apply the recommendations in practice, giving recommendations for the formation of working groups and the use of human and financial resources, as well as cooperation and exchange of information with stakeholders. Appropriate strategic or tactical managers from each regulator participate in the work of the Subcommittee, and its work is governed by the Memorandum of Understanding and the appropriate Rules of Procedure.
3. **Working groups** that will have the task to work on recommendations and that will report to the Subcommittee on the activities undertaken, the analysis performed and other documented research on the application of the recommendations in practice on a regular basis.
4. **Secretariat** for providing administrative support to the work of the Fintech Committee and the Subcommittee - **Secretariat**, which provides administrative support to the work of the Fintech Committee, the Subcommittee and working groups, with responsibility for coordinating activities, organizing meetings of the committees and working groups, keeping minutes of the held meetings and regularly submitting reports to the committees. The working method of the Secretariat is regulated by the Memorandum of Understanding and the corresponding rules of procedure for the work of the Fintech Committee and the Subcommittee.



6. Implementation of the recommended actions

The Fintech Strategy for the Regulators is subject to approval by the Fintech Committee, which has the ultimate responsibility for the efficient and timely implementation of the Strategy's recommendations. Taking into account that this Committee has primarily a supervisory role, it is envisaged that the regular activities for the implementation of the recommendations will be carried out by the working groups with the participation of experts from the regulators whose work will be coordinated and supervised by the Subcommittee. In order to achieve a higher degree of efficiency, the possibility of hiring experts (domestic or foreign) who could be involved in the implementation of certain recommendations is envisaged. The task of the Subcommittee is to evaluate the need to establish working groups, to determine the professional profile of the persons who would potentially be involved in the work for a separate recommendation or group of recommendations from the Strategy and to submit an appropriate proposal for adoption by the Fintech Committee.

After working groups are formed and experts are identified to implement certain recommendations, the Subcommittee introduces them to the work by explaining the recommendation, the necessary engagement and the goals that should be achieved if the recommendation is implemented in a timely and efficient manner. Given that several recommendations may be interrelated, if necessary, the Subcommittee may share the Fintech Strategy for the Regulators as a whole, together with the Detailed Fintech Recommendations Document for Financial Regulators with some working groups.

Each working group has the task of analyzing the recommendation, if necessary to conduct additional research in order to cover all possible aspects of the subject area and to submit a documented report of its work to the Subcommittee. For each recommendation, it is envisaged that the working group will have the right to undertake the following three options:

1. To accept the recommendation, giving the working group the opportunity to add additional aspects to help with implementation.
2. To modify the recommendation so that it would be materially different from the one originally proposed. However, although such an opportunity is given, appropriate approval is required by the Fintech Committee, after prior approval by the Subcommittee.
3. To reject the recommendation with adequate reasoning. If a position is taken to reject the recommendation, the documented report of the working group should be approved by the Fintech Committee, after prior approval by the Subcommittee. The working group has the right to recommend a different course of action or propose another recommendation that will have to be reviewed and approved by the Fintech Committee.

A scoring system and priority in implementation is provided for each recommendation. The results of the scoring and the interdependence of the recommendations allow setting a time frame for the implementation of the recommendations (Annex I: Schedule with indicative timeline for the implementation of the recommendations). However, the time frame is an indicative frame during which the working groups assess whether the proposed time is adequate for the implementation of the recommendation or they will propose revising the deadline.

The realization of the tasks of the working groups and the reports on their progress are monitored by the Subcommittee, while the possible requests for the extension of the indicative deadlines require an appropriate justification.

7. Key risks and challenges in the implementation of the Fintech Strategy for the Regulators

The document with detailed fintech recommendations for regulators contains a detailed elaboration of the risks, challenges and proposed actions. The Fintech Strategy for the Regulators also includes the Guide for assessing the risks arising from financial technologies, which aims to help regulators to identify, assess, measure, mitigate and monitor the risks arising from financial technologies.

Regulators, through their participation in the governance structure proposed by this strategy, should take into account the different types of risks and proactively develop strategies to mitigate their consequences on the users of financial services, financial institutions, the financial system as a whole.

8. Oversight and assessment

The governance structure established by the Fintech Strategy for the Regulators should ensure the monitoring of all implementation initiatives, but also the taking of appropriate actions, if difficulties are observed in the implementation of recommendations.

In order to enable the monitoring of the progress in implementing the recommendations, for each recommendation there are key performance indicators (so-called KPIs) and key risk indicators

(so-called KRIs). These indicators can serve the working groups as indicative benchmarks, whereby they can also determine other indicators to measure the results. Once they decide which indicators from this strategy they will apply or decide to apply other indicators to measure results, the working groups regularly report to the Subcommittee on the progress.

Ideally, each working group would submit monthly reports to the Subcommittee through the Secretariat.

The Subcommittee prepares a report on the progress in the implementation of the recommendations, which it submits to the Fintech Committee once every six months, or more often if necessary.

Annex I: Indicative timeline for the implementation of the recommended actions for the regulators

							2023				2024				2025				2026				2027			
NO.	Recommendation	Importance	Priority	Impact	Effort	Overall Score	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
ALL REG #15	New Fintech Ventures or Products Must Develop Robust Wind Down Plans as a Condition to Their Licensing	5	5	5	-1	14				√																
ALL REG #1	Development of a Cross Regulatory Innovation Hub	5	5	4	-1	13		√																		
ALL REG #5	Regulatory Capacity Building	5	5	4	-2	12			√																	
ALL REG #9	Risk Assessment of the Impact of a More Open Regulatory Environment to allow Innovation and Competition	5	5	4	-2	12				√																
ALL REG #11	COVID Impact Assessment to Identify Quick Win Fintech Opportunities	4	5	4	-1	12				√																
ALL REG #14	Regulators Regularly and Proactively Engage with Fintech Innovators Across the Ecosystem to Understand Challenges, as well as Communicate Regulatory Developments with the Aim of Strengthening Fintech Developments	5	5	4	-3	11			√																	
ALL REG #7	Assessing Regulatory Barriers for Fintech Led Development & Devise Strategies to Reduce Such Barriers or Inconsistency in the Regulatory Framework	5	5	4	-4	10								√												
NBRNM REG #12	Addressing Practical Challenges for Non Bank and / or Fintech Firms to access the Payment System, despite legislation facilitating such access	4	4	3	-2	9							√													
ALL REG #2	Development of a Cross Regulatory SANDBOX	5	3	4	-4	8								√												
ALL REG #4	Realign Organisational Structure	4	5	4	-5	8																				
ALL REG #8	Anticipating & Documenting New Fintech Business Models	4	2	3	-1	8								√												
ALL REG #10	Clarity on Specific Regulatory Provisions and Examining Barriers to their adoption	3	3	4	-3	7						√														
ALL REG #3	Regional & International Regulatory Cooperation	3	2	4	-3	6																				
ALL REG #6	Consumer Protection for Financial Services Products and Services, including the Creation of a Financial Services Ombudsman	3	3	4	-5	5											√									
ALL REG #16	Government and Regulators must Explore the Feasibility of Developing an Open Finance Regulatory and Business Framework	3	3	4	-5	5																				√
ALL REG #13	Identifying & Remediating Obstacles for Customers to Switch Accounts from Traditional Players to Fintech Newcomers	2	2	2	-2	4								√												
ALL REG #17	Regulators are Efficient and Effective because they Adopt Suptech and Regtech Solutions Ongoing	3	1	3	-3	4																√				
ALL REG #18	The Opportunities, Challenges, and Impact of Central Bank Digital Currency for Fintech Innovators and on Fintech Innovation is Understood	2	1	3	-4	2												√								