

CONSULTATION PAPER

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Notices to Banks and Merchant Banks on Management of Outsourced Relevant Services

MAS

Monetary Authority of Singapore

Contents

1	Preface	3
2	Relevant services for which requirements are imposed	5
3	Register of outsourced relevant services	7
4	Requirements relating to material ongoing outsourced relevant services....	8
5	Requirements relating to outsourced relevant services that involve the disclosure of customer information	15
6	Requirements for a bank or an MB incorporated in Singapore to implement a group policy on outsourced relevant services.....	16
7	Effective dates	17

1 Preface

1.1 On 6 January 2020, Parliament passed the Banking (Amendment) Act 2020 (BAA). The BAA introduces several amendments to the Banking Act (BA) to update and enhance MAS' banking regulatory framework. These include the consolidation of the regulation of merchant banks (MBs) under the BA and the introduction of a new section 47A, which applies where a bank in Singapore obtains or receives any relevant service from any branch or office of the bank located outside Singapore (including the head office of the bank) or any person.

1.2 This consultation paper sets out the proposed requirements in relation to the management of outsourced relevant services by banks and MBs in Singapore.

1.3 The proposed Notice to Banks on Management of Outsourced Relevant Services is appended as Annex B to this paper. MAS intends to mirror requirements of this notice for MBs in a Notice to MBs on Management of Outsourced Relevant Services (collectively referred as "Notices").

1.4 The proposed Notices set out requirements on:

- (a) Ongoing outsourced relevant services of banks and MBs in Singapore, with a focus on services which are material; and
- (b) Outsourced relevant services, including those which are not material or not ongoing, which involve the disclosure of customer information by banks or MBs to service providers. For such services, a subset of requirements aimed at protecting customer information will apply.¹

1.5 Once the proposed Notices take effect, MAS Notices 634 and 1108² will be repealed. Banks and MBs are to comply with the proposed Notices when disclosing customer information to service providers under the exceptions permitted in the Third Schedule to the BA.

1.6 Pending the issuance of the proposed Notices, MAS expects banks and MBs to continue to observe the Guidelines on Outsourcing ("Guidelines") and adhere to existing

¹ The bank or MB will also need to ensure that such disclosure is allowed under applicable laws such as item 1 of Part I of the Third Schedule to the BA or item 3 of Part II of the Third Schedule to the BA.

² These notices are issued pursuant to item 3 of Part II of the Third Schedule to the BA.

requirements in MAS Notices 634 and 1108. MAS will subsequently review and amend the Guidelines to align with the proposed Notices.

1.7 MAS invites interested parties to provide their views and comments on the proposed Notices. The next sections will highlight specific issues which MAS is seeking feedback on.

Please note that all submissions received will be published and attributed to the respective respondents unless they expressly request MAS not to do so. As such, if respondents would like:

- (a) their whole submission or part of it (but not their identity), or**
- (b) their identity along with their whole submission,**

to be kept confidential, please expressly state so in the submission to MAS. MAS will only publish non-anonymous submissions. In addition, MAS reserves the right not to publish any submission received where MAS considers it not in the public interest to do so, such as where the submission appears to be libellous or offensive.

1.8 Please submit written comments by 29 January 2021 to –

Banking Department
Monetary Authority of Singapore
10 Shenton Way, MAS Building
Singapore 079117
Fax: (65) 62203973
Email: outsourcing@mas.gov.sg

1.9 Electronic submission is encouraged. We would appreciate that you use the prescribed format for your submission to ease our collation efforts.

2 Relevant services for which requirements are imposed

2.1 Under the BA, MAS may impose requirements on banks and MBs where they obtain or receive “**relevant services**”³. MAS currently intends to operationalise these powers for only “**outsourced relevant services**”⁴, which MAS proposes to define as a relevant service –

- (a) that is or was performed by the bank or MB prior to it obtaining or receiving the relevant service;
- (b) which is commonly performed by banks or MBs in Singapore; or
- (c) which is specified as such by MAS.

2.2 To help the industry in determining which relevant services are outsourced relevant services, MAS is proposing to set out:

- (a) a non-exhaustive list of relevant services that are commonly performed by banks or MBs (Annex A of the proposed Notices);
- (b) an exhaustive list of relevant services that are not commonly performed by banks or MBs and thus, are excluded from the definition of outsourced relevant service (Annex B of the proposed Notices); and
- (c) an exhaustive list of relevant services, that are not commonly performed by banks or MBs, but are considered by MAS as outsourced relevant services and thus, are subject to relevant requirements in the proposed Notices⁵ (Annex C of the proposed Notices).

2.3 MAS invites interested parties to provide feedback on the lists, including suggestions on relevant services to be added or removed from the list. When providing such suggestions, respondents are encouraged to provide the rationale for doing so and other supporting information.

³ Relevant service is defined in the BA, in relation to a bank in Singapore, to mean any service obtained or received by the bank, other than a service provided in the course of employment by an employee of the bank or a service provided by a director or officer of the bank in the course of his or her appointment, and does not include any service specified by the Authority by written notice.

⁴ MAS currently has no plans to impose requirements beyond outsourced relevant services. MAS will consult industry and relevant stakeholders in any future review on imposing requirements on relevant services beyond outsourced relevant services.

⁵ Requirements will apply if a service is ongoing or involves the disclosure of customer information.

2.4 Broadly, the proposed Notices will impose requirements on the following:

- (a) **Ongoing⁶ outsourced relevant services:** Banks and MBs are to maintain a register of all such outsourced relevant services obtained or received from service providers, regardless of whether they are material. Please refer to section 3 for details on the register of outsourced relevant services;
- (b) **Material ongoing outsourced relevant services:** Such relevant services will be subject to the full set of requirements in the proposed Notices; and
- (c) **Outsourced relevant services which involve the disclosure of customer information:** A subset of requirements focused on the protection of customer information will be imposed on such relevant services regardless of whether they are material or ongoing, or whether customer consent has been obtained for the disclosure of customer information. Such relevant services are also to be included in the register of outsourced relevant services.

2.5 MAS has identified a list of **exempted outsourced relevant services** (Annex D of the proposed Notices) that are ongoing outsourced relevant services, but banks and MBs do not need to comply with the requirements in the proposed Notices for these services. Services on this list include key enablers in Singapore's Smart Nation strategy, which are wholly provided by the Government Technology Agency (GovTech) or its agents. For these services, MAS has assessed that there is no need to subject banks and MBs to the proposed Notices, in view of the oversight and controls that GovTech has in place in providing these services. In addition, MAS also proposes that relevant services that are not for the conduct of banking business and where the service provider does not have access to the bank's or MB's confidential or customer information be considered as exempted outsourced relevant services, and not be subject to the proposed Notices given the nature of such services⁷.

⁶ Ongoing outsourced relevant service, in relation to a bank or an MB, means an outsourced relevant service that (a) the bank or MB obtains or intends to obtain, for a duration of more than 1 year or (b) the bank or MB obtains for a duration of 1 year or less, but where the outsourcing agreement is renewed or extended, or is intended to be renewed or extended, such that the cumulative duration of the agreement exceeds or would exceed 1 year.

⁷ Examples of such services include cleaning, gardening, building maintenance services and receptionist services.

2.6 The requirements and expectations applicable to different types of relevant services are illustrated in Annex C of this paper.

Question 1. MAS seeks comments on the proposed annexes of the proposed Notices as follows:

- a. List of relevant services commonly performed by banks or MBs in Singapore (Annex A of the proposed Notices)
- b. List of relevant services that are not commonly performed by banks or MBs, and thus, are excluded from the definition of outsourced relevant service (Annex B of the proposed Notices)
- c. List of relevant services that are not commonly performed by banks or MBs, but are considered by MAS as outsourced relevant services (Annex C of the proposed Notices)
- d. List of exempted outsourced relevant services (Annex D of the proposed Notices)

Respondents should provide the rationale to support their suggestions to add or remove services from the annexes.

3 Register of outsourced relevant services

3.1 A bank or an MB in Singapore will be required to maintain a register which contains a record of the following:

- (a) all ongoing outsourced relevant services, regardless of whether they are material; and
- (b) all outsourced relevant services that involve the disclosure of customer information, regardless of whether the services are provided once-off or on an ongoing basis.

3.2 MAS proposes for the register to be submitted to MAS at least semi-annually or upon request. This requirement is more frequent than the existing expectation under the Guidelines, which calls for an annual submission or upon request. The increase in submission frequency is to allow MAS to be apprised in a relatively timely manner of new ongoing outsourced relevant services of banks and MBs, given that banks and MBs are no longer expected⁸ to notify MAS before receiving a material ongoing outsourced relevant service.

⁸ Prior to August 2016, under the Guidelines, a bank or an MB was expected to notify MAS before it commenced a new material outsourcing arrangement.

3.3 MAS also proposes to expand the scope of the register to include outsourced relevant services referred to in paragraph 3.1(b). This is to ensure that banks and MBs have a record of service providers whom they are disclosing customer information to. The requirement in the proposed Notices for a bank or an MB to submit the register to MAS is to replace the existing condition for disclosure of customer information under MAS Notices 634 and 1108⁹, whereby banks and MBs are required to notify MAS of all outsourcing arrangements involving the disclosure of customer information upon entering into the outsourcing agreement.¹⁰

3.4 For the avoidance of doubt, while submission is required semi-annually and upon request, banks and MBs are required to ensure that their registers are comprehensive and accurate at all times, as part of effective oversight of the outsourced relevant services.

3.5 Banks and MBs are expected to use the template available on MAS website¹¹ when submitting the register to MAS. MAS intends to review and update the template in future.

Question 2. MAS seeks comments on the requirement for a bank or an MB to submit to MAS a register of outsourced relevant services (described in paragraph 3.1) semi-annually or upon request.

4 Requirements relating to material ongoing outsourced relevant services

Management of material ongoing outsourced relevant services

4.1 A bank or an MB must manage and control any risk from its material ongoing outsourced relevant services. This includes having policies and procedures to identify all ongoing outsourced relevant services that are material and the corresponding risks posed to the bank or MB.

⁹ These notices set out conditions which banks and MBs are to comply with when disclosing customer information to a service provider outside Singapore under item 3 of the Third Schedule to the BA.

¹⁰ At paragraph 3 of MAS Notices 634 and 1108.

¹¹ Please refer to Annex 3 of the Guidelines available at www.mas.gov.sg/regulation/guidelines/guidelines-on-outsourcing.

Evaluation of service providers

4.2 Before obtaining or receiving any material ongoing outsourced relevant service, a bank or an MB must establish a framework for evaluating the ability of the service provider, and perform due diligence checks against the framework and be satisfied of the results.

4.3 In the case of intragroup services¹², a bank or an MB may perform reduced due diligence checks on a service provider, as the financial resources or reputation of the service provider would be less of a concern given that it is a related party. However, the bank or MB is still required to assess the service provider's risk management framework and track record. While a service provider in the same banking group as the bank or MB may share similar risk management frameworks as the bank or MB, these frameworks may not be identical to cater for operational, jurisdictional or other differences. It is therefore still necessary for the bank or MB to assess if such differences would affect the ability of the intragroup service provider to provide the material ongoing outsourced relevant service.

4.4 In addition, for all material ongoing outsourced relevant services which involve the disclosure of customer information to service providers, the bank or MB must assess the risks to the bank's or MB's ability to comply with its obligations to keep confidential customer information.

4.5 The bank or MB will also be required to re-perform the due diligence checks within a year and thereafter, at a frequency approved by the bank's or MB's board, or a committee delegated by it¹³. The bank or MB must ensure that the policy on the frequency of due diligence checks after the first year is commensurate with the risk to the bank or MB, which may arise from receiving the material ongoing outsourced relevant service. These requirements are to determine whether the initial assessment of the bank or MB of its service provider remains valid.

¹² In the case of a bank or an MB, intragroup services are where the service provider has the same ultimate holding company as defined in section 5A of the Companies Act (Cap. 50.) as the bank or MB or where the service provider is the ultimate holding company of the bank or MB, as defined in section 5A of the Companies Act.

¹³ For a bank or an MB incorporated in Singapore, the committee should be a Board-level committee. For a bank or an MB incorporated outside Singapore, the committee should be a Board-level committee, or a management committee or body responsible for the oversight of the branches and offices of the bank or MB located within Singapore.

Question 3. MAS seeks comments on the requirements pertaining to the management of material ongoing outsourced relevant services and evaluation of service providers.

Outsourcing agreements

4.6 Banks and MBs will be required to enter into outsourcing agreements for their material ongoing outsourced relevant services and to ensure the inclusion of certain terms in these agreements. The terms include protection of information (including customer information), right to audit by MAS or an auditor appointed by MAS, provision of information to the bank or MB and MAS, grounds for termination, and requirement for the service provider to enter into its own written agreement with any of its sub-contractor.

4.7 As communicated previously¹⁴, while MAS will not require banks or MBs to include a right for banks or MBs to audit their service providers or sub-contractors in their outsourcing agreements at this point, banks and MBs should still take reasonable steps to negotiate for the inclusion of such a term in their outsourcing agreements where feasible.

Question 4. MAS seeks comments on the requirement for banks and MBs to enter into outsourcing agreements for their material ongoing outsourced relevant services and to ensure the inclusion of certain terms in these agreements.

Question 5. MAS seeks comments on the terms required to be included in the outsourcing agreements.

Protection of customer information

4.8 Banks and MBs receiving a material ongoing outsourced relevant service will need to implement adequate measures to protect customer information that is disclosed to a service provider. These measures include:

- (a) notifying a service provider of the bank's or MB's and the service provider's obligation to keep customer information confidential;
- (b) ensuring that customer information is disclosed, accessed, collected, copied, modified, used, stored or processed only to the extent that is necessary to provide the relevant service and including terms to this effect in the bank's or MB's outsourcing agreement; and

¹⁴ Response to Feedback Received (dated 5 November 2019) on Consultation Paper on Outsourcing by Banks and Merchant Banks.

- (c) ensuring that the bank or MB is notified where a service provider or sub-contractor has been compelled by law to disclose any customer information.

4.9 Having considered previous feedback received, MAS intends to encourage (instead of require) banks and MBs to obtain legal advice pertaining to situations where customer information may be required by law to be disclosed by a service provider, where an outsourced relevant service involves the disclosure of customer information to the service provider. Such legal advice should be obtained based on a frequency approved by the bank's or MB's board, or a committee delegated by it, and whenever there are significant changes in the written law.

Question 6. MAS seeks comments on the requirements pertaining to the protection of customer information.

Use of sub-contractor

4.10 To safeguard the privacy of customer information, banks and MBs are currently prohibited from disclosing customer information to any person except under certain exceptions specified in the BA. One such exception is where disclosure by the bank or MB is permitted in writing by the customer or, if he is deceased, his appointed personal representative.

4.11 In the context of a material ongoing outsourced relevant service where a bank or an MB discloses customer information to its service provider, who then further discloses the customer information to a sub-contractor, such disclosure and further disclosure will only be allowed if the customer has permitted in writing, the disclosure by the bank or MB to the service provider¹⁵.

4.12 The proposed Notices will introduce requirements consistent with this approach whereby sub-contracting arrangements¹⁶ in a material ongoing outsourced relevant service will only be permitted if:

¹⁵ See exception under Item 1 of Part I of the Third Schedule to the BA. To avoid doubt, a bank or an MB may also directly disclose customer information to a sub-contractor if this has been permitted by the customer in writing.

¹⁶ In the case of a bank or an MB, "sub-contracting arrangement" means an arrangement between a service provider and a sub-contractor, or between two sub-contractors, under which the sub-contractor or one of the sub-contractors, as the case may be, agrees to provide the whole or any part of a relevant service to the bank or MB.

- (a) there is no disclosure of customer information by the service provider to the sub-contractor; or
- (b) the bank or MB has been permitted in writing by the customer, or, if he is deceased, his appointed personal representative, for the bank or MB to disclose customer information to the bank's or MB's service provider or directly to the sub-contractor.

4.13 In addition, before a bank or an MB obtains any material ongoing outsourced relevant service where a service provider is permitted to engage a sub-contractor, the bank or MB will need to:

- (a) assess¹⁷ and be satisfied that allowing a sub-contracting arrangement for the material ongoing outsourced relevant service will not compromise the confidentiality and integrity of information disclosed to the service provider, and pose undue risks that the bank or MB is not able to manage; and
- (b) include terms in its outsourcing agreement with the service provider for services where disclosure of customer information is involved, to require the service provider to in turn include terms in the service provider's agreement with its sub-contractors on the safeguarding of the confidentiality and integrity of customer information.

4.14 The above requirements are to ensure that banks and MBs will carefully assess the implications of any sub-contracting arrangement and that confidentiality and integrity of information is safeguarded.

4.15 A bank or an MB will also need to put in place procedures¹⁸ for determining whether it should require in its outsourcing agreements with its service providers that the service providers have written agreements with their sub-contractors, and if so, whether certain specified terms¹⁹ should be included in the agreements between the service providers and their sub-contractors. This requirement is intended to allow banks and MBs to take a risk-proportionate approach in considering the risks and specific circumstances

¹⁷ The assessment could entail reviewing the service provider's risk management framework for sub-contractors or taking reasonable steps to ensure that the service provider reviews the sub-contractors as part of its due diligence checks.

¹⁸ These procedures have to be approved by the bank's or MB's board, or a committee delegated by it.

¹⁹ These pertain to right to audit, access to information, protection of confidentiality of customer information and termination.

of each material ongoing outsourced relevant service, in deciding whether to require its service provider to have written agreements with its sub-contractor(s).

4.16 The bank or MB will also be required to ensure that it is notified when a new sub-contractor is engaged by its service provider. Upon receiving such notification within 30 days of the engagement of the sub-contractor, the bank or MB has to determine if it has to assess the ability of the sub-contractor to provide the relevant service and safeguard information confidentiality and integrity. This is to ensure that the bank or MB remains apprised and considers the risks involved from the engagement of the new sub-contractor.

Question 7. MAS seeks comments on the requirements pertaining to the use of sub-contractors for material ongoing outsourced relevant services.

Audit

4.17 Banks and MBs will be required to ensure that independent and regular audits are conducted on all their material ongoing outsourced relevant services at a frequency of no longer than 3 years between audits. Banks and MBs may rely on pooled audits or third-party certification performed by independent parties to comply with this requirement. Self-attestations will not satisfy this requirement, as they would not be considered independent.

4.18 Banks and MBs are to submit to MAS a list of all audits of its material ongoing outsourced relevant services performed in the past 12 months. The required frequency of submission of the list of audits will be communicated to banks and MBs bilaterally as it will vary from entity to entity, depending on factors such as the complexity of the material ongoing outsourced relevant services of the bank or MB, and the extent of reliance on such services. Based on the list of audits, MAS may request for specific audit reports to be submitted, and banks and MBs will have to furnish such reports.

Question 8. MAS seeks comments on the requirements pertaining to the audit requirements for material ongoing outsourced relevant services.

Termination of material ongoing outsourced relevant services

4.19 A bank or an MB has to ensure that its outsourcing agreements for material ongoing outsourced relevant services allow the bank or MB to cease obtaining the relevant service under certain specified scenarios. These include scenarios where a service provider or sub-contractor has failed to safeguard the confidentiality or integrity of customer information, or to perform the relevant service in accordance with the

outsourcing agreement. A bank or an MB is not precluded from including in its contract, grounds for termination beyond those required in the proposed Notices.

4.20 To reduce the risk of unauthorised disclosure of, access to, collection of, copying of, modification of, and use of customer information, a bank or an MB will need to ensure that information given to the service provider and sub-contractor (where applicable) are deleted, destroyed or rendered unusable, unless the service provider or subcontractor is prohibited from doing so by law.

Question 9. MAS seeks comments on the requirements pertaining to the termination of material ongoing outsourced relevant services.

Where a material ongoing outsourced relevant service is obtained or received from an overseas regulated financial institution

4.21 Where a bank or an MB receives a material ongoing outsourced relevant service from an overseas regulated financial institution (ORFI), the bank or MB will be subject to certain additional requirements. These requirements are to ensure that the bank's or MB's customer information will be adequately protected by the ORFI, and that the bank or MB, as well as MAS, will continue to have access to customer and other information relating to the material ongoing outsourced relevant service.

4.22 In particular, a bank or an MB will be required to provide MAS with a written undertaking from the supervisor of the ORFI relating to the:

- (a) safeguarding of customer information;
- (b) ability of the bank or MB, and MAS, to access customer information and other relevant information; and
- (c) ability of the bank or MB, or any person it appoints, to audit the ORFI and submit reports of the audit to MAS.

4.23 If it is not possible to obtain a confirmation from the overseas supervisor on the safeguarding of customer information (for example, where the overseas supervisor does not provide such confirmation as a matter of practice), the bank or MB may, in lieu of such a confirmation²⁰ and with MAS' approval, submit to MAS the following:

²⁰ To avoid doubt, the bank or MB will still be required to provide a confirmation from the overseas supervisor on (a) the ability of MAS to access customer and other information, and (b) the ability of the bank or MB to audit the ORFI.

- (a) the bank's or MB's policies and procedures for managing requests for information from the overseas supervisor; and
- (b) a written undertaking by the bank or MB to notify MAS of any disclosure of customer information to the overseas supervisor.

Question 10. MAS seeks comments on the requirements in paragraph 4.22 pertaining to an ORFI's provision of material ongoing outsourced relevant services.

Question 11. MAS seeks comments on the requirement in paragraph 4.23 on a bank or an MB to provide MAS with a confirmation from the overseas supervisor of the ORFI and the scope of such a confirmation.

5 Requirements relating to outsourced relevant services that involve the disclosure of customer information

5.1 MAS proposes setting out specific requirements on outsourced relevant services that involve the disclosure of customer information, to ensure that banks and MBs take due care to protect such information. These requirements will apply to all outsourced relevant services that involve the disclosure of customer information, regardless of whether (a) they are ongoing or material, (b) the bank or MB has obtained written customer consent for such disclosure of customer information, or (c) the disclosure of customer information is to a service provider in Singapore or overseas.

5.2 The requirements include for the bank or MB to:

- (a) evaluate prior to and on an ongoing basis, the service provider's ability to safeguard the confidentiality and integrity of customer information disclosed to the service provider;
- (b) enter into an outsourcing agreement with the service provider, which must include specified requirements on the service provider in relation to protection of customer information; and
- (c) implement adequate measures to protect customer information that is disclosed to the service provider against unauthorised disclosure, access, collection, copying, modification, use, disposal or similar risks.

5.3 These requirements in Section C of the proposed Notices are also found in the more extensive requirements under Section B of the proposed Notices, which applies in respect of material ongoing outsourced relevant services. For clarity, where an outsourced relevant service which involves the disclosure of customer information is also a material ongoing outsourced relevant service, the requirements in Section B will apply.

5.4 Currently, MAS Notices 634 and 1108 set out conditions which banks and MBs are to comply with when disclosing customer information to a service provider outside Singapore under item 3 of the Third Schedule to the BA. As the proposed Notices issued under section 47A will impose requirements with the same objective of protecting customer information, MAS Notices 634 and 1108 will be repealed once the proposed Notices take effect. This means that banks and MBs will only need to refer to a single notice for all requirements concerning outsourcing arrangements, regardless of whether it involves the disclosure of customer information.

5.5 As part of streamlining the requirements which will apply to outsourcing arrangements, MAS proposes for a single meaning of “customer”²¹ to be used throughout the proposed Notices. This is wider than the definition of “customer”²² as defined in section 40A, which currently applies to MAS Notices 634 and 1108 and excludes companies which carry on banking business, merchant banking business or investment banking business²³.

Question 12. MAS seeks comments on the requirements applicable to outsourced relevant services that involve the disclosure of customer information, and for the meaning of “customer” which will apply to these requirements to include companies which carry on banking business, merchant banking business or investment banking business.

6 Requirements for a bank or an MB incorporated in Singapore to implement a group policy on outsourced relevant services

6.1 MAS will require a bank or an MB incorporated in Singapore to implement a group policy on outsourced relevant services, to ensure that all its branches comply with the requirements in the proposed Notices. MAS expects a bank or an MB incorporated in Singapore to likewise implement a group policy on outsourced relevant services for their respective subsidiaries unless there is strong justification not to do so.

Question 13. MAS seeks comments on the requirement for a bank or an MB incorporated in Singapore to implement a group policy on outsourced relevant services.

²¹ For the purpose of the Notices, “customer” includes any company which carries on banking business and such other financial institutions as may be designated by the Authority by notice in writing for the purposes of section 40A of the Act.

²² Under section 40A, “customer”, in relation to a bank, includes the Authority or any monetary authority or central bank of any other country or territory, but does not include any company which carries on banking business or such other financial institution as may be designated by the Authority by notice in writing.

²³ Section 40A read together with Notice 631.

7 Effective dates

7.1 MAS intends to provide banks and MBs with a 12-month period from the date of issuance of the proposed Notices, to comply with the requirements in the proposed Notices, other than those relating to outsourcing agreements. For requirements that relate to outsourcing agreements, a bank or an MB will need to comply with them 12 months from the date of issuance of the proposed Notices, or from the date on which the bank or MB enters into a new agreement or renews an existing agreement, whichever is later. This will allow the bank or MB to make use of the opportunity during the negotiation of the agreement to include the terms required by the proposed Notices.

Question 14. MAS seeks comments on the effective dates of the proposed Notices.

Annex A

LIST OF QUESTIONS

Question 1. MAS seeks comments on the proposed annexes of the proposed Notices as follows:

- a. List of relevant services commonly performed by banks or MBs in Singapore (Annex A of the proposed Notices)
- b. List of relevant services that are not commonly performed by banks or MBs, and thus, are excluded from the definition of outsourced relevant service (Annex B of the proposed Notices)
- c. List of relevant services that are not commonly performed by banks or MBs, but are considered by MAS as outsourced relevant services (Annex C of the proposed Notices)
- d. List of exempted outsourced relevant services (Annex D of the proposed Notices)..... 7

Question 2. MAS seeks comments on the requirement for a bank or an MB to submit to MAS a register of outsourced relevant services (described in paragraph 3.1) semi-annually or upon request.8

Question 3. MAS seeks comments on the requirements pertaining to the management of material ongoing outsourced relevant services and evaluation of service providers.....10

Question 4. MAS seeks comments on the requirement for banks and MBs to enter into outsourcing agreements for their material ongoing outsourced relevant services and to ensure the inclusion of certain terms in these agreements.....10

Question 5. MAS seeks comments on the terms required to be included in the outsourcing agreements.....10

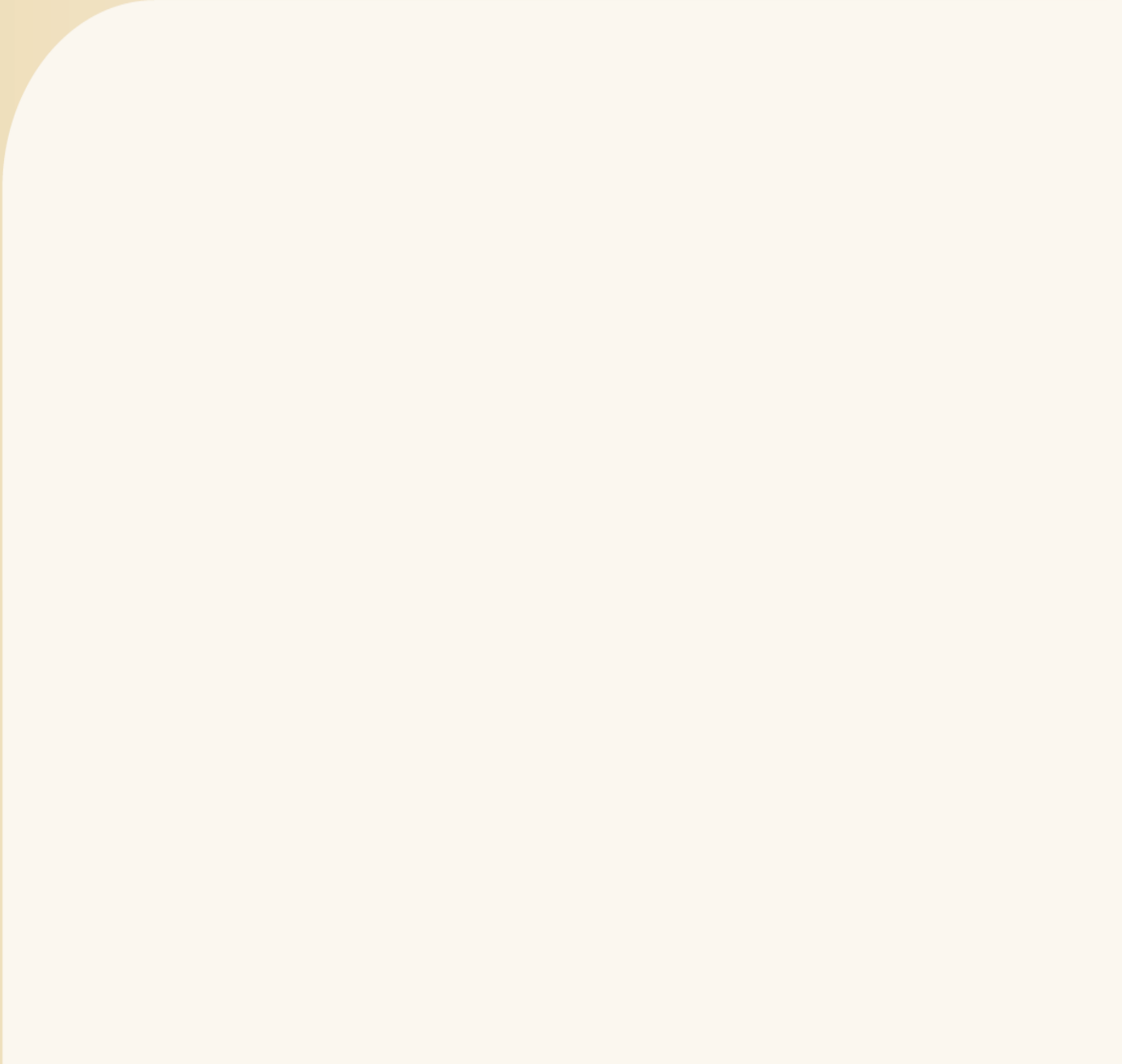
Question 6. MAS seeks comments on the requirements pertaining to the protection of customer information.....11

Question 7. MAS seeks comments on the requirements pertaining to the use of sub-contractors for material ongoing outsourced relevant services.....13

Question 8. MAS seeks comments on the requirements pertaining to the audit requirements for material ongoing outsourced relevant services.13

Question 9. MAS seeks comments on the requirements pertaining to the termination of material ongoing outsourced relevant services.14

- Question 10.** MAS seeks comments on the requirements in paragraph 4.22 pertaining to an ORFI’s provision of material ongoing outsourced relevant services... 15
- Question 11.** MAS seeks comments on the requirement in paragraph 4.23 on a bank or an MB to provide MAS with a confirmation from the overseas supervisor of the ORFI and the scope of such a confirmation.15
- Question 12.** MAS seeks comments on the requirements applicable to outsourced relevant services that involve the disclosure of customer information, and for the meaning of “customer” which will apply to these requirements to include companies which carry on banking business, merchant banking business or investment banking business.16
- Question 13.** MAS seeks comments on the requirement for a bank or an MB incorporated in Singapore to implement a group policy on outsourced relevant services.16
- Question 14.** MAS seeks comments on the effective dates of the proposed Notices.....17



Monetary Authority of Singapore