



Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

6th October 2021 President, Association of Legal Professionals and Advocates (Cayman) President, Alternative Investment Management Association (Cayman) President, Blockchain Association of the Cayman Islands Chief Executive Officer, Cayman Finance President, Cayman Islands Association of Financial Advisors President, Cayman Islands Bankers Association President, Cayman Islands Company Managers Association President, Cayman Islands Compliance Association President, Cayman Islands Directors Association President, Cayman Islands Fund Administrators Association President, Cayman Islands Insurance Association President, Cayman Islands Legal Practitioners Association President, Cayman International Reinsurance Companies Association Chief Executive Officer, Cayman Islands Institute of Professional Accountants President, CFA Society of the Cayman Islands President, Insurance Managers Association of Cayman President, Recovery and Insolvency Specialists (Cayman) Association President, Society of Trust and Estate Practitioners (Cayman Islands) Dear Heads of Private Sector Associations Re; Private Sector Consultation Paper: Revised Basel III Framework: Rules and Guidelines on Liquidity Risk Management for Banks The Cayman Monetary Regulatory Authority International ("the Authority") forwards herewith for comments the proposed: Revised Basel III Framework: Rules and Guidelines on Liquidity Risk Management for Banks A Private Sector Consultation Paper ("PSCP") is being forwarded along with the proposed revised measure to provide the relevant Associations with the consultation documents as required by the Monetary Authority Act (2020 Revision). Please refer to the PSCP for further details on the Background, Purpose and Rationale of the revised measure, and Significant Costs and Benefits. If your association has comments, please forward a consolidated response on its behalf, on or before Wednesday, November 10, 2021. Before proceeding with the proposed revised measure, the Authority shall have regard to any representations made by the private sector associations only. Feedback submitted by individuals, entities, or other bodies, unless acting on behalf of private sector associations, will not be accepted by the Authority. Representations from private sector associations must be submitted as a consolidated document, and a listing of the entities which provided feedback should be included. Private sector associations should ensure that conflicting positions are resolved prior to submission SIX, Cricket Square P.O. Box 10052 Grand Cayman KYI-1001, Cayman Islands Page 2 to the Authority. Where positions conflict within or across associations, the Authority will consider all available information in taking a decision, which will be at its sole discretion. To ensure that all responses are given due consideration, it is important that private sector associations make clear reference to the sections of the measure being commented on, and that responses are unambiguous, clearly articulated and based on fact. The consultation process is not designed to address complaints or grievances. Feedback of this nature should be submitted through the established complaints process. In cases where the feedback proposes to change a policy position of the Authority or substantially amend any requirement of the draft measure, information to support the position of the association must be provided. The table below provides an example of the Authority's expectation with regard to feedback for the proposed measures. ReferenceExample of a Helpful Comment Examples of Comments needing more Support Rule 4.2[^] In Rule 4.2 the current text omits the fair value measurement of liabilities. Also, as defined it is not asymmetrical with the Market Price definition and thus scenarios exists that fall into neither category. Suggested wording: Hard-to-Va/ue Securities means an asset or liability for which there is no Market Price which is required to be measured at fair value X This is not what is done in other jurisdictions. X I don't think we should do this. X CMRAI is not considering the position of the experts. pursuant to 5.2 The consultation

document will be posted to the Authority's website at We look forward to your responses. If you have any queries, please contact Paul McAllister, Chief Policy and Development Officer at PaiJiMcAilisteKacirriaJ^.

Yours sincerely,
Cindy Scotland Managing Director, CMRAI
This example is not reflective of the content of the proposed measures.
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