

IRELAND FOR FINANCE

The strategy for the development of Ireland's international financial services sector to 2025

Action Plan 2020



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Foreword

I am pleased to introduce the *Ireland for Finance* 2020 Action Plan, which is the first Action Plan to be published since the formation of the new Government in June of this year. My appointment as the Minister of State at the Department of Finance with special responsibility for financial services underlines the Government of Ireland's commitment to the growth of the international financial services sector in Ireland.

I would like to acknowledge the work of my predecessor, Michael D'Arcy, for his development of the *Ireland* for Finance strategy and his efforts in developing this Action Plan also. I would also like to thank the various Government Departments and agencies, particularly IDA Ireland and Enterprise Ireland, the public sector High Level Implementation Committee, the Industry Advisory Committee, and the industry representative bodies, who have helped develop this Action Plan and who will lead the implementation of the individual action measures contained in it.

The original intention was for this Action Plan, which was developed in December 2019, to have been approved by Government earlier this year and to then have been published in quarter 1. However, this did not happen and while there was not a formally approved Action Plan in place for 2020, I am aware that the various lead organisations on these Action Measures have been making progress on their measures throughout the year. In addition, this Action Plan has been updated since then to take account of the passage of time and the unprecedented challenge of COVID-19 that we are facing.

As we are now in the second half of 2020, I believe that our energies must be focused on developing our Action Plan for 2021. This plan will have to take account of the challenges of COVID-19, Brexit readiness, and how the international financial services sector can assist Ireland in its national economic recovery. I look forward to continued engagement with all of the international financial services (IFS) stakeholders as we achieve our vision of:

- ensuring that Ireland continues to be a top-tier location of choice for financial services companies providing specialist services to a global customer base;
- enhancing our competitiveness by implementing a series of measures targeted at improving our operating environment, nurturing and developing our talent, encouraging innovation and technological advances, and increasing the level of understanding of the success of the industry through better domestic and international communication; and
- placing Ireland at the forefront of positive industry developments in products, services and operational models so that Ireland is recognised as the jurisdiction in which world-leading expertise in financial services and technology combine and innovate.

Seán Fleming TD

Minister of State for Financial Services, Credit Unions and Insurance

Department of Finance

Slan Fleming

October 2020



Ireland for Finance Strategy

Ireland for Finance is a strategic framework to support the further development of the international financial services sector in Ireland to 2025. The **vision** of the strategy is for Ireland to be a top-tier location of choice for specialist international financial services and to enhance and protect our future competitiveness.

The framework consists of four Pillars and three Horizontal Priorities.

- The first Pillar focuses on the operating environment. The objective under this Pillar is to ensure the policy, culture and legislative conditions underpinning international financial services will support growth.
- The second Pillar focuses on technology and innovation. The objective under this Pillar is to provide a collaborative approach to addressing emerging challenges and opportunities in technological developments.
- The third Pillar focuses on talent. The objective under this Pillar is to ensure that we continue to have skilled people to meet the demands of the international financial services sector, including meeting needs for new and changing skills.
- The fourth Pillar focuses on communications and promotion. The objective under this Pillar is focused on ensuring that Ireland's international financial services (IFS) offering is communicated to all those who are or may be attracted to in investing in Ireland.

The three Horizontal Priorities that apply across the four Pillars are: Regionalisation, Diversity, and Sustainable Finance. The first Horizontal Priority is regionalisation. Regional enterprise growth and job creation is a key element of national policy, and actions taken under Ireland for Finance will apply that principle in a variety of ways, including support for firms to establish operations in regional locations and support for the provision of courses and professional development in higher educational institutions across the whole country. The second Horizontal Priority is diversity. Workforce diversity is important for business, including financial services firms. Actions taken under Ireland for Finance will raise awareness of the need to increase diversity in the sector and, over the life of the strategy, to seek to identify concrete actions that can be taken to secure better representation and participation of a number of groups at all levels in the industry. The third Horizontal Priority is sustainable finance. Sustainable finance is the capital required to tackle climate change, and actions under Ireland for Finance

will increase the profile, knowledge, understanding and commitment to providing international financial services to meet the imperative of combating climate change. The horizontal priorities align with and support the objectives of Project Ireland 2040 as outlined in the overarching Strategy.

International promotion

The *Ireland for Finance* strategy was launched by the Minister for Finance, Paschal Donohoe TD, and the then Minister of State for Financial Services and Insurance, Michael D'Arcy TD, in April 2019. The launch was held in Iveagh House, and it was attended by a large number of executives and financial sector leaders from across the industry. A number of guests travelled from many different locations abroad for the launch. It attracted extensive media coverage, both domestically and internationally.

During the following months, a number of visits to key global markets were held to launch the Strategy and to further promote Ireland as a top-tier location of choice for specialist international financial services. This itinerary included Brussels, London, New York, Hong Kong and Tokyo. It included engagements with senior executives in firms across a range of financial services sectors in each city.

These international launches of *Ireland for Finance* attracted keen interest from the financial press and were covered by the *Wall Street Journal*, the *Financial Times*, *Bloomberg*, the *Nikkei*, and *Sky News*.

The Ireland for Finance team also undertook a series of engagements with professional and representative bodies to brief them on the Strategy and the Government's goals for the sector. Among the industry organisations briefed were the Federation of International Banks in Ireland, the Institute of Banking, Financial Services Ireland, Aircraft Leasing Ireland, Irish Funds, the Federation of European Securities Exchanges, the Irish Management Institute, and the British Irish Chamber of Commerce.

In addition to the team in the International Finance Division of the Department of Finance, more than 70 officials in the Department of Foreign Affairs, in the state enterprise agencies, and the embassy network devoted significant amounts of time to promoting *Ireland for Finance* and *Ireland's* financial services offering.

The Director of International Finance Division in the Department of Finance undertook five overseas visits to promote *Ireland for Finance*, to Hong Kong, London, Luxembourg, San Francisco, and Washington DC. Enterprise Ireland¹ (EI) organised ten events to promote Irish financial services firms in the fintech sector in overseas markets, and the IDA² participated in approximately 50 conferences where Ireland's offering for international financial firms was promoted.

The advancement of the Strategy and Action Plan will continue, supported by the Government's *Global Ireland Strategy* to double the scope and impact of Ireland's global footprint in the coming years with specific efforts already underway in the Asia Pacific region.

A whole-of-government Asia Pacific Strategy was launched on 9 January 2020. This new strategy acts as a compass for the future development of our relations with countries across this diverse and increasingly economically important region. It has a number of high-level strategic objectives, looking towards the enhancement of our political relationships, the deepening of our trading relationships, and a focus on raising our visibility.

We are committed to the continued promotion of Ireland as a world-class source of fintech and financial services products in the Asia Pacific region. We will seek to build on the €151 million of Irish fintech exports currently going to the region and, in line with *Ireland for Finance* for the development of the international financial services sector to 2025, harness, in particular, the opportunities presented by China, India and other Asian financial markets. harness, in particular, the opportunities presented by China, India, and other Asian financial markets.

Changing nature and complexity of IFS landscape in Ireland

The character and composition of Ireland's international financial services sector will fundamentally change in a number of ways as a result of the extensive financial services investments won in recent years, including Brexit relocations and the pipeline of future projects. The industry in Ireland will become deeper and more diverse.

 Enterprise Ireland is the government organisation responsible for the development and growth of Irish enterprises in world markets.

2 The IDA is the non-commercial, semi-state body for promoting foreign direct investment into Ireland, helping potential and existing investors establish or expand their operations in Ireland. The real impact of Brexit for the industry in Ireland may not materialise for some years. At present, firms are establishing the foundations of a new or significantly expanded presence in Ireland, while simultaneously meeting regulatory requirements, reconfiguring their overall EU business, and monitoring the process of the UK exit from the EU. When this phase is complete, they will then begin to consider future plans and ways in which to leverage and develop their new Irish entities. The future conversations with firms will be around back, middle and front office activities, product range and distribution, service offering, digital transformation, innovation and optimisation.

Case Study: Fexco and University College Cork

FINTECHNEXT is a multi-million euro, four-year collaborative research programme between University College Cork and Fexco, supported by Science Foundation Ireland (SFI), to deliver applied and funded research dedicated to disrupting three key fintech verticals: Treasury & FX, Digital Taxation, and Corporate Asset Administration.

FINTECHNEXT aims to research, design and develop the next-generation financial service framework and infrastructure for applications in three particular areas of financial services, namely, digital taxation, treasury services and corporate asset administration through developing and applying cloud computing and Big Data technologies. The research proposes the development of innovative products and services, which will lead to economic and societal progress and measurable outputs including publications in world-leading journals and the development of highly innovative IP for commercialisation.

Total funding is estimated at €3m, of which FEXCO will contribute €1.4m, with SFI funding the remainder.

The Central Bank's vision for the Irish financial system is that it is well-managed, well-regulated, and sustainably serves the needs of the economy and consumers over the long term. Given the international nature of financial markets and the increasingly international aspects of the Irish financial services sector, the Bank also has a responsibility to consider the broader impacts of the financial system in cooperation with its European peers. Being part of this complex European financial services ecosystem, the Central Bank plays an active role in the European framework of regulation and supervision.

Within that framework, it operates a robust and effective approach to authorisations and supervision.

COVID-19 has seen a test of the financial system like no other in the last decade, triggered by an unprecedented economic shock (in both scale and speed) as a result of the public health crisis. The financial system entered the current phase in a more resilient position compared with the onset of the financial crisis a decade ago. Indeed, the domestic banking system played a role in supporting the liquidity needs of households and businesses to date in this crisis, including through payment breaks. The capital buffers that banks have built up in recent years are now there to absorb those losses; however, these are not limitless.

As challenges continue to emerge during this COVID-19 period, opportunities still exist and positive trends toward digitalisation and sustainability need to be reinforced to reimagine the way for businesses and finance to contribute to sustainability and the increasingly digital future.

Ireland for Finance played a key role as a platform to deliver on EU-wide trends and policies on sustainable finance through consultation with stakeholders to inform the next EU Sustainable Finance strategy to support the European Green Deal channelling private investment to the transition to a climate-neutral economy.

In addition, the Department of Finance, under the *Ireland for Finance* Strategy, carried out a large consultation process to help inform the new EU Digital Finance Strategy to reinforce the digital future.

Overall, history suggests that regulation together with openness – to trade, capital, and people – and a business-friendly regulatory environment have been key determinants for the success of financial centres, whose fate has tended to evolve slowly, unless hurried by economic and political disorder.

Case Study: The InsurTech Networking Centre (INC)

Based in IT Carlow, the INC is a new development that was announced in 2019. Developed in collaboration with Enterprise Ireland under the Regional Enterprise Development Fund 2017–2020 and in partnership with Carlow County Council and Wexford County Council, the INC will collaborate with the insurance sector to create growth in areas such as data science, design thinking, software and games development, the internet of things, and distributed ledger technology.

Horizontal Priorities and headline actions — progress in 2019

SUSTAINABLE FINANCE

Tackling climate change is the most pressing challenge of our time. It attracted increased public attention and action in the last year. The transition to a low-carbon, sustainable economy will require significant investment. The European Commission estimates that additional investments of almost €180 billion will be needed each year between 2021 and 2030 if the European Union is to meet its climate and energy targets³. The EU High-Level Expert Group on austainable finance⁴ states that €90 billion investment per year will be needed in water treatment and supply, and that an additional €50 billion per year will be needed in transport and logistics. To deliver this level of investment, mobilising private sector capital will be paramount.

The financial system has a key role to play here. The financial system can be part of the solution towards a greener and more sustainable economy. Reorienting private capital to more sustainable investments requires a comprehensive shift in how the financial system works. This is necessary if the EU is to develop more sustainable economic growth, ensure the stability of the financial system, and foster more transparency and long-termism in the economy. To that end, mobilising private capital is a key priority of the Commission's 2018 Action Plan for Financing Sustainable Growth, which aims to further connect the financial system with the sustainability agenda. Such thinking is also at the core of the EU's Capital Markets Union (CMU) project⁵ and the European Commission is to present a renewed sustainable finance strategy.

Significant progress was made in 2019 on the Commission's Action Plan on Financing Sustainable Growth, with the adoption of two Regulations, one on benchmarks and one on disclosures, and in June 2020, with the adoption of the Taxonomy Regulation which establishes a clear and detailed classification framework — or taxonomy — for environmentally sustainable economic activities, creating a common language for all stakeholders in the financial system.

³ https://eur-lex.europa.eu/legal-content/EN/ TXT/?uri=CELEX:52018DC0097

⁴ https://ec.europa.eu/info/publications/sustainable-finance-high-level-expert-group_en

⁵ https://ec.europa.eu/info/publications/200924-capital-markets-union-action-plan_en

Top Tier Location of Choice for Specialist IFS

Annual Action Plans

Pillar 1



Operating Environment Pillar 2



Technology & Innovation

Pillar 3



Talent

Pillar 4



Communications & Promotion

Public - Private Collaboration

During Ireland's second *Climate Finance Week* in November 2019, Sustainable Nation Ireland published its deep sector analysis, which shows high demand for training and professional development on sustainable finance in the financial services sector.

At this event, Sustainable Nation Ireland also coordinated a 'statement of intent' which was signed by the Banking and Payments Federation Ireland, Financial Services Ireland, Insurance Ireland, Irish Funds, the Irish Association of Pension Funds, and the Irish Association of Investment Managers pledging to take action across 2020 to mitigate climate change risk through sustainable finance.

In 2020, Ireland will also continue to play an increasingly important role in international efforts that support the acceleration of the sustainable finance agenda. Examples where Ireland is already active and working with others to share best practice include the Coalition of Finance Ministers for Climate Action, the Central Bank's involvement with the international Network for Greening the Financial System, the insurance regulators international Sustainable Insurance Forum, the UN Environment Programme (UNEP) Financial Centres for Sustainability Network (FC4S) of 30 financial centres which has a node located in Dublin, and the UNEP Finance Initiative (UNEP FI). UNEP FI will bring new ambition, building on its dialogue with the Coalition of Finance Ministries for Climate Action and reaching out to other parts of society to encourage more ambitious action.

Case Study: The growth of green bonds in Ireland

By end of 2019, Ireland was rated number one in the world for green bond listings. Dublin, for the first time, overtook London as a Green Bond listing hub. The global issuance of bonds seeking to raise capital in support of climate-related projects has grown substantially in recent years. From \$85 billion in 2016 and to \$170 billion in 2018, the green bond market globally grew to an estimated \$230 billion by the end of 2019.

Underpinned by coordinated public and private sector efforts across 2018 and 2019, Ireland placed considerable emphasis on growing its percentage of the Green Bond market. With the successful issuance of €3 billion in Green Sovereign Bonds in October 2018, Ireland became the fourth country in Europe to launch such an initiative. In late 2019, the NTMA raised a further €2 billion, bringing the total amount of Ireland's State green bonds dedicated to Irish climate related projects to €5 billion. In parallel with this, Ireland's semi-state energy utility company ESB placed a €500-million Green Bond during the summer of 2019. In May 2019, the World Bank also jointly listed a \$1.5-million sustainable bond on Euronext Dublin, its first bond in Ireland in 25 years.

In September 2019 the International Finance Corporation (IFC), a member of the World Bank Group, jointly listing its first Canadian dollar Green Bond on Euronext Dublin. This was the largest Canadian dollar-denominated deal ever issued by the IFC at CA\$750 million, and the proceeds of the five-year Green Bond will finance the IFC investments in green projects, including renewable energy, green buildings, sustainable forestry, and energy efficiency. In October, this was quickly followed by AIB's announcement that it had developed a Green Bond framework. Bringing Irish efforts together, during Ireland's second Climate Finance Week in November 2019, it was announced that Euronext Dublin was to host the Euronext Group Green Bond segment comprising 80 issuers and 190 green bonds valued at €120 billion.

DIVERSITY

Organisations that are diverse improve collaboration and drive better financial performance by harnessing the power of different experiences, knowledge and skills. Diversity is good for business, and gender diversity can affect the process and quality of decision-making. It can guard against groupthink by bringing a heterogeneity of values, beliefs, and attitudes. Research by the Central Bank found that financial institutions must do more work to ensure they are sufficiently diverse and inclusive, particularly at senior level, to prevent groupthink, guard against over-confidence, and promote internal challenge.

In the *Ireland for Finance* Action Plan 2019, the Industry Advisory Committee (IAC) was tasked with developing a **Women in Finance charter** (**WIF charter**). The WIF charter, will entail companies that sign the Charter committing to supporting the progression of women into senior roles in the financial services sector by focusing on the executive pipeline and mid-tier level positions.

International comparators such as the UK's Women in Finance Charter, launched in March 2016, have been signed by more than 350 organisations covering 800,000 employees across the financial services sector. Ireland is aiming to build on this international example, and significant progress has been made. In Action Plan 2020, industry has committed to work on a similar charter or seek a suitable and up-to-date alternative and seek signatory organisations.

The Government, on its own journey to achieve gender balance and diversity across the system, has noted significant progress in this regard.

On 8 March 2019, the Government agreed to establish a **Public Sector Network** within the **30% Club Ireland**. It is intended that this initiative will offer opportunities to promote greater gender balance in the public sector, in addition to sharing good practice on promoting women in leadership between the public and corporate sectors.

There is a long-standing Government target, from the early 1990s, to achieve a minimum representation of 40% of women and 40% of men in the membership of State boards. This target was first met in June 2019 in respect of the overall average membership. At the end of December 2018, the average gender balance across the membership of all State boards was 41.5% female and 58.5% male. This is the highest level of female representation ever. However, the target has yet to be met by every individual board: fewer than half (48%) of individual boards currently meet the 40% target.

On 28 November 2019, the Government published the LGBTI+ Strategy to ensure that LGBTI people are treated equally and that their rights are protected under this framework.

The Central Bank considers a lack of diversity at senior management and board level to be a leading indicator of heightened behavior and culture risks in financial institutions. According to the Central Bank of Ireland, analysis of applications received in 2018 for approval to occupy senior roles within regulated firms in Ireland (under the Fitness and Probity Regime) shows that the proportion of applications for regulatory approval of women for senior roles in the financial services sector increased to 24% in 2018, compared with 22% in the previous year. According to the Central Bank report Demographic Analysis - Applications for Pre-Approval Controlled Functions (PCF) roles in regulated firms – 2019, the sector with the largest proportion of women making applications was credit unions, where 31% of applications were women, followed by banking at 30%. However, in absolute terms, the total numbers of applications in these sectors were lower than in each of the other sectors reported. Across all sectors, the proportion of applications by women for approval for board level positions increased from 20% in 2018 to 26% in 2019; the proportion on women applying for approval for management level positions was higher but remained static at 29% in both 2018 and 2019.

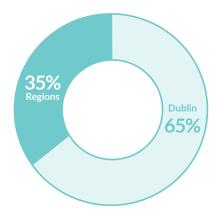
In 2020, the work on diversity and gender balance will continue, pressing to ensure diversity and gender balance is a priority and agenda point in international financial services firms. It is also important to continue to drive the agenda to the next level.

REGIONALISATION

Regional enterprise growth and job creation is a key element of national policy, and the development of the regions is one of the horizontal priorities of this strategy.

Over a third of international financial services jobs are located in areas outside Dublin. The sector has a significant presence in a number of regional locations including Cavan, Clare, Cork, Drogheda, Dundalk, Galway, Kerry, Kilkenny, Letterkenny, Leitrim, Limerick, Sligo, Tipperary, Waterford, Wexford, and Wicklow.

REGIONAL DISTRIBUTION OF JOBS



A number of international financial services companies have chosen to build centres of excellence in regional locations in Ireland, taking advantage of the opportunity afforded by the higher staff retention rates associated with operations outside Dublin. There are many benefits to this focus, such as reduced costs for companies, supporting the regions to realise their full economic potential, and enabling businesses to draw on regional labour pools and well-renowned third-level institutions that work successfully with IFS companies.

Other benefits include the availability of cheaper commercial real estate, air connectivity, and the quality of life, all of which make locating in the regions an attractive option for employees and companies.

The importance of links between IFS employers, educational institutions (both undergraduate and postgraduate), and the education and training boards (for school leavers) should not be underestimated. These links are vital because IFS firms in regional locations rely on local educational institutions to provide a skilled workforce, and in turn, IFS firms provide career opportunities for skilled workers in regional locations.

The enterprise agencies (EI and IDA) actively promote the advantage of regional locations for the sector, to both existing and target clients. There is an active 'second site' strategy in which companies in Dublin are encouraged and supported to establish a second office in a regional location.

Promoting these advantages will continue to form a key part of the communications process under the *Ireland for Finance* strategy.

The Regional Enterprise Plans published by the Department of Business, Enterprise and Innovation are a key policy response for supporting employment growth across the nine regions, with public and private stakeholders engaged in driving the range of innovative and practical actions relevant to each region set out in the plans. An objective of the Regional Enterprise Plans is identifying significant sectoral strengths in each of the regions. This will also enable the regions to identify the challenges they face in trying to attract businesses. It will also enable the regional plans to link more closely to other government strategies.

HEADLINE ACTIONS

Stakeholder Engagement – Central Bank of Ireland (CBI)

In order to effectively deliver on its mandate, the Central Bank of Ireland works closely with stakeholders in the financial services industry. In particular, the Central Bank undertakes stakeholder engagement across a broad range of sectors. Industry representative groups meet with senior Central Bank representatives at regular stakeholder roundtables; for other sectors there are less formal arrangements.

A key focus in the Central Bank of Ireland's *Strategic Plan 2019–2021* is to enhance its strategic engagement with the public and relevant stakeholders at home and abroad.

In 2019, and in line with the commitment in *Ireland for Finance* Action Plan 2019, the Central Bank reviewed its stakeholder engagement in order to consider how best to ensure that its engagement models include the broadest range of relevant parties, including industry representatives and non-industry participants such as consumer groups, public interest groups and academics. As part of that work, the Central Bank reviewed the stakeholder engagement models used by its international peers and the European Supervisory Authorities. The Central Bank also reviewed relevant research and commentary on the topic.

Following that work, the Central Bank of Ireland is committed to reviewing its engagement with stakeholders.

Investment Limited Partnerships Bill

Ireland is a global leader in the investment funds sector with €3 trillion of Irish domiciled funds. The sector in Ireland is internationally focused, investing in assets and with investors from across the globe and is a large employer both directly and indirectly, distributed across the country. Ireland is also the largest European domicile for Exchange Traded Funds (ETFs). Financial services legislation is constantly being updated and amended, including legislation specific to the financial services industry, as well as the transposition of EU directives. The Department of Finance is currently progressing legislation on Investment Limited Partnerships to support the development of the growth finance and funds industry in Ireland.

The rationale for the proposed legislative changes is to provide a more flexible regime for investors wishing to use a partnership structure for regulated investment funds, to make Ireland more attractive to international investors, and to grow the private equity funds sector. Further amendments will ensure that anti-money laundering obligations on Investment Limited Partnerships and Common Contractual Funds are aligned with other Irish fund vehicles.

The modernisation of the Investment Limited Partnerships legislation is one of the Government's strategic priorities in *Ireland for Finance* and a commitment to progress the Bill is also included in the Programme for Government.



Action Measures for 2020

Pillar 1 Operating Environment

	Description of Action Measure	Lead	Stakeholders	Deadline
1	EU legislative and regulatory proposals The Department of Finance will meet industry representative bodies periodically to exchange views and to discuss progress on EU dossiers in financial services. The Department of Finance will continue every six months to meet the incoming Presidency of the Council of the EU to	D/Fin	Industry, D/FA	Q2, Q4
	examine potential issues and expand on Ireland's EU priorities, including financial services. The Department of Finance's work will include engagement with European Commission, DG FISMA and other DGs to discuss financial services with the Commissioner and Commission officials on a regular basis.			
2	Ireland's network of double taxation agreements The Department of Finance will continue to explore opportunities to expand and renew Ireland's treaty network and ensure our existing treaties remain appropriate in a post-BEPS (Base Erosion and Profit Shifting) environment. The Department and the Revenue Commissioners will, as appropriate, maintain an open dialogue with the IFS industry regarding relevant developments.	D/Fin	Revenue Commissioners, D/FA, D/BEI	Q3
3	Engage at EU level on the Capital Markets Union proposals The Department of Finance will continue to monitor and contribute to EU developments on Capital Markets Union.	D/Fin		Q4
4	Collection and analysis of data with CSO The Department of Finance will continue to work with the Central Statistics Office (CSO), State agencies and other organisations to seek to gather, record and publish more granular data on the economic contribution of the IFS sector as a subset of the financial services sector as a whole.	D/Fin	CSO, IDA, EI, D/BEI	Q4
5	Engagement on, and analysis of, Brexit and financial services issues The Public Sector Financial Services Sub-group will engage and liaise with all IFS stakeholders, including the Joint Committee, where Brexit is a standing agenda item. This work will include: - engaging bilaterally with relevant stakeholders in both Ireland and the EU; - engaging bilaterally with industry representative bodies, and - evaluating developments in relation to financial market infrastructures.	D/Fin	Industry, PSCG, IAC, All representative bodies, IDA, EI	Q2, Q4

6	National legislative and regulatory proposals The Industry Advisory Committee, in consultation with the IFS industry representative bodies, will identify and make submissions on proposed legislative provisions they consider important to further develop the operating environment.	IAC	Industry stakeholders, D/Fin, D/Justice	Q4
7	Increased influence at EU level: improve collaboration among Irish industry representative bodies in Europe Successful collaboration is critical to ensure Ireland's voice on financial services is heard at EU level. Industry representative organisations should develop stronger relationships with similar representative organisations in other Member States. This engagement will build on regular collaboration between representative organisations to exchange information to work together on relevant issues. Industry will work to identify ways to act as 'one voice' in engaging with the Irish and EU authorities.	IAC	Industry representative associations	Q2, Q4
8	Ireland as a global location for private equity funds The Department of Finance will progress legislation on Investment Limited Partnerships to support the development of the growth finance and funds industry and will provide updates to the Joint Committee on progress achieved.	D/Fin	Industry D/BEI	Q3, Q4
9	Finance Green Ireland Committee (FGIC) As per the renewed EU sustainable finance strategy, a more sustainable financial system means economies and societies will be more resilient toward climate and environmental risks. In addition, sustainable finance provides instruments that can be utilised to align public and private finance towards climate action and support a just transition. With an updated Terms of Reference and building on 2019 successes, including the positioning of Ireland as a world leader for green bond listing, the public-private sector FGIC will work to coordinate and accelerate national sustainable finance efforts to ensure Ireland realises its ambition in this area. Activities include the publication of Ireland's sustainable finance roadmap to guide IFS green and sustainable finance activities across the themes of enabling environment, skills development, innovation and product development, international promotional efforts, and international collaboration; and support for the Sustainable Finance Skillnet programme.	FGIC	SNI, Industry representative organisations, IDA, D/Fin, D/FA, D/ECC, NTMA, EIT Climate-KIC	Q3, Q4
10	International collaboration to mobilise global financial centres in support of the sustainability agenda Sustainable Nation Ireland, via membership of the UNEP Financial Centres for Sustainability Network (FC4S), will continue to support international collaboration efforts to mobilise financial centres globally to further embed the sustainable finance agenda in support of meeting the Paris Agreement and targets in the UN Sustainable Development Goals.	SNI	UNEP FC4S, D/Fin, D/FA, EIT Climate-KIC	Q3, Q4

11	Continue to raise awareness of the environmental, social & governance (ESG) agenda and best practise across all asset classes in Ireland The Sustainable and Responsible Investment Forum Ireland (SIFI) Committee will continue to significantly advance the ESG agenda by means of a dedicated national ESG best practice and digital library web portal, quarterly leadership briefing events, support an ESG skills development programme under the Sustainable Finance Skillnet and host ESG Day during Climate Finance Week. In addition, SIF Ireland will publish the third annual Irish ESG State of Play report, which will again measure the progress of ESG integration across all asset classes, the growth of the sector, identify barriers to continued growth, and identify relevant recommendations for government to consider to support overall integration efforts.	SIFI	SNI, Industry associations, Sustainable Finance Skillnet	Q4
12	Update of 2018 report Financing Ireland's transition to a low-carbon economy In the context of the EU's renewed sustainable finance strategy, the importance placed on the New Green Deal and Irish national decarbonisation financing requirements, Sustainable Nation Ireland will update the 2018 report Financing Ireland's transition to a low-carbon economy, with a focus on the role of private capital in achieving this and a series of recommendations as to how best to accelerate.	SNI	Industry associations, EIT Climate-KIC	Q4
13	Central Bank stakeholder engagement group Following research and consideration of various stakeholder engagement models in 2019, the Department will liaise with the Central Bank regarding the continuation by the Central Bank of its work on reviewing its engagement with stakeholders.	D/Fin	CBI, IAC	Q1, Q4
14	Regional showcase event IFS sector in the South-West Host a showcase event to highlight the regional strengths and activities in IFS in the South-West to support the regionalisation horizontal priority and build on the existing strengths of the region's ICT and cybersecurity clusters to promote the technology and innovation pillar.	Cork Financial Services Forum	IDA, EI, UCC, Cork Institute of Technology	Q4

Pillar 2 Technology and Innovation

	Description of Action Measure	Lead	Stakeholders	Deadline
15	Enterprise Ireland will run a week-long capability programme specifically aimed at early stage and seed fintech high-potential start-ups. This aims to develop the capability of early-stage fintech companies that are either pre-seed and fund raising for the first time or are seeking second-round funding. The short programme will encompass a number of different elements including value proposition development, pitching for funding and selling capability but focused completely on the unique nature of the financial services end-market. The programme seeks to compress the critical modules of an accelerator using a time-limited approach based on the needs of a specific cohort of early-stage fintech companies. It is envisaged that 10 to 12 early-stage companies will be invited to participate; it is hoped that at least one third would go on to raise equity funding within 12 months of completion.	EI	Industry	Q2
16	Fintech Foresight Group The Fintech Foresight Group (FFG) will continue to promote greater collaboration across public and private stakeholders from all elements of the fintech ecosystem to develop a growth mindset within the industry. The group will conduct a benchmarking exercise to identify key technologies for financial services with high potential and assess Ireland's capabilities for the development of centres of excellence for Ireland's eco system. The outputs from the FFG will go to a new financial foundry to promote the sharing of ideas, testing of concepts, development of prototypes and building of partnerships between fintech, banks, and payment institutions. It will provide a platform for harnessing the collective expertise of the financial services and fintech sectors.	BPFI/FPAI	Fintech Foresight Group, HLIC, IAC, industry associations, third-level institutions, EI, IDA	Q2, Q4
17	Future opportunities for ePayments The Irish Payments Council (BPFI) will work with relevant stakeholders to develop an industry Payment Strategy. The Irish Payments Council will also develop and implement a national mobile account-to-account payment scheme and launch SEPA instant payments on a domestic and pan-European basis.	BPFI	Irish Payments Council	Q4

18	Aviation Technology Taskforce The Aviation Technology Taskforce with the support of the Department of Finance will continue to find technology initiatives which could be developed by Irish firms to support Irish aviation businesses. Given Ireland's leading position in both the technology and aviation sectors, the Aviation Technology Taskforce will work on mutually beneficial products and services to further enhance employment in the sectors and increase the sustainability of both sectors. The first phase of this work, initiated by Aircraft Leasing Ireland, will research the viability of a central register of maintenance work. The taskforce will update IAC and the Joint Committee within six months of the publication of the Action Plan.	Ibec, ALI	Industry, D/Fin	Q4
19	Development of an InsurTech Hub Insurance Ireland plan to develop an InsurTech Hub to have the insurance industry and technology firms work more closely together. The Hub aims to help develop InsurTech startups through mentoring, coaching, events, and engagement with insurers.	Insurance Ireland	Industry members, technology companies, IDA	Q4
20	Sustainable finance and fintech activities There is an important window of opportunity for Ireland to strengthen alignment between two transformative agendas – sustainable finance and fintech – that will serve as defining forces in European and global capital markets in coming years. Sustainable Nation Ireland, supported by the European Institute of Innovation and Technology and the Knowledge Innovation Community (EIT Climate-KIC) together with several leading large Irish financial institutions, is now establishing a sustainable finance innovation platform to support Irish efforts in this space. This will build on what international examples and will focus on the development of new products and services to support the reorientation of capital to the climate action agenda within Ireland. In addition, this platform will also support innovations in data infrastructure and scaling green data and analytics innovations and the development of anti-green washing tools for investors.	SNI	Industry associations, EIT Climate- KIC Working Group	Q3, Q4

Pillar 3 Talent

	Description of Action Measure	Lead	Stakeholders	Deadline
21	Women in Finance Charter Further progress the arrangements for the establishment of the Women in Finance Charter or a suitable alternative. Industry stakeholders will invite a number of financial services companies to sign the Charter in 2021. Industry will update at the end of Q4.	FSI in partnership with BPFI	IAC, D/Fin, other industry representative bodies and industry stakeholders	Q4
22	Women in Financial Services Leadership Programme The IMI and IFS Skillnet to deliver a Women in Financial Services Leadership Programme to enable women leaders to discover their authentic leadership identity, to refine their purpose, to invest their work and ambitions with meaning, and learn tools and approaches to both navigate today's complex world of work and become future-fit.	IFS Skillnet	Irish Management Institute (IMI), D/FHERIS, FSI, Skillnet Ireland	Q4
23	Focussed training and development: Institute of Banking 1. The Institute of Banking will design and deliver a series of flexible, blended education and training offerings to upskill those in the workforce in the areas of data, digital and innovation. 2. The Institute of Banking will design and deliver a series of online offerings developed to increase awareness of sustainable finance across the industry.	Institute of Banking	Industry	Q3
24	Promotion and provision of learning courses – Skillnet Ireland 1. Financial Services Innovation Excellence Programme: Technology Ireland ICT Skillnet will design and deliver the Financial Services Innovation Excellence Programme and on-board the first cohort of up to ten organisations in Q3 2020. 2. Robotic Process Automation (RPA) Implementation Programme: Technology Ireland Software Skillnet and IFS Skillnet will collaborate on the design and development of the Robotic Process Automation Implementation Programme.	Technology Ireland, ICT Skillnet	Skillnet Ireland, D/FHERIS, IDA, EI, SFI, NSAI, FSI	Q4
25	Data Analytics for Aviation Finance Leaders The Aviation Skillnet will design and deliver the Data Analytics for Aviation Finance Leaders Programme.	Aviation Skillnet	Skillnet Ireland, D/FHERIS, IDA, Aircraft Leasing Ireland	Q4

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26	Leadership programme for the international insurance sector Insurance Ireland and IFS Skillnet Ireland have collaborated with UCC to design, develop and deliver an accredited leadership programme tailored to the international sector of the Insurance Industry. Designed to develop leadership capability across the sector the programme will run twice in 2020 on a consortium basis.	IFS Skillnet Ireland	Insurance Ireland, D/FHERIS, Skillnet Ireland, IDA	Q4
27	Executive Programme in Technology Management Technology Ireland ICT Skillnet will design and deliver the Executive Programme in Technology Management.	Technology Ireland ICT Skillnet	Skillnet Ireland, D/FHERIS, IDA, EI, FSI	Q4
28	IFS Legislative Alignment Summit The IFS Legislative Alignment Summit will bring together leading experts in GDPR, AML and other key legal areas to discuss how apparent conflicts and vacuums can be aligned and addressed.	Law Society Finuas Skillnet	Skillnet Ireland, D/FHERIS, Law Society of Ireland	Q4
29	Develop and deliver sustainable finance educational programmes Building on the Deep sector analysis of future Sustainable Finance skills and talent requirements in Ireland, published in November 2019, Sustainable Finance Skillnet will support the development of several sub-sector focused Sustainable Finance skills development programmes across banking, insurance and asset management by building a suite of programmes focused on: general awareness; baseline technical knowledge; climate risk; knowledge of regulation and frameworks; the EU taxonomy; disclosure including TCFD; and convergence of sustainable finance and technology. Programmes will either be stand-alone or integrated into existing educational programmes.	Sustainable Finance Skillnet	SIF Ireland, Skillnet Ireland, D/FHERIS, SNI, Industry associations	Q4
30	Chartered Accountants Ireland syllabus and education programme The Chartered Accountants Ireland (CAI) will assist in attracting, retaining, and upskilling people in the sector by promoting the flexible route to Chartered Accountancy to the financial services sector, emphasising the availability of the new financial services elective in the final professional exam.	Chartered Accountants Ireland	ІоВ	Q4
31	Nationwide expansion of IFS Apprenticeship Programme Increasing both the numbers of apprentices and employers in apprenticeship schemes will ensure a pipeline of skilled staff for the sector and ensure Ireland's competitiveness in an everchanging world of financial services. The IFS Apprenticeship Programme has achieved high quality outputs for companies and apprentices, opening an entirely new route for individuals to work in the financial services sector. Financial Services Ireland and the National College of Ireland will lead on the nationwide expansion of the IFS Apprenticeship, through regional class-based learning and blended (online) learning offerings.	FSI, National College of Ireland	D/FHERIS, SOLAS, HEA, Apprenticeship Council	Q4

Pillar 4 Communication and Promotion

	Description of Action Measure	Lead	Stakeholders	Deadline
32	Plan the European Financial Forum 2021 Following the hosting of the 5th European Financial Forum (EFF) 2020 in February, IDA will review the EFF and present the findings of this review, including the possibility of, and the requirements for, hosting a future event to the Joint Committee.	IDA	PSCG, Industry	Q3, Q4
33	Enterprise Ireland inward buyer visit International buyers will be brought to Ireland to meet one-to-one with Irish fintech companies in the week of the EFF to create commercial opportunities for Irish companies. The visit will provide an opportunity, in the context of <i>Ireland for Finance</i> , to showcase and promote Ireland's fintech ecosystem directly to key decision makers primarily from international financial services companies. It is envisaged that approximately 40 international buyers	EI	IDA, BPFI	Q1
	will attend and over 60 El financial services and fintech client companies in regtech, fintech, financial software and other relevant technology-led areas servicing the financial services sector will attend from a broader cohort of target companies.			
34	Regional focus Part of the development of IFS has been the emergence of a number of regional centres which are becoming increasingly important in expertise, employment, economic activity and linkages to the education sector. To ensure that these locations continue to grow as complementary locations to Dublin while developing their ability to attract and retain business into the future, they will be promoted under this strategy in line with <i>Project Ireland</i> 2040: <i>National Planning Framework</i> and the relevant Regional Spatial and Economic Strategy. This promotion by the IDA and EI will also involve close collaboration with industry, chambers of commerce and other stakeholders including the Regional Assemblies and local authorities, as appropriate. A regional focus will be included in each progress report. These short, focussed reports will also be published on the IFS website.	IDA, EI	D/BEI, Regional Chambers of Commerce, D/FHERIS, IAC	Q4
35	Promotion of Ireland internationally The IDA will engage with international stakeholders to promote Ireland as a centre for IFS in support of other actions in the strategy. In the context of the pandemic, IDA will carry out overseas marketing programmes and engage in virtual outreach with their client base overseas to provide reassurance around Ireland's response to the pandemic, and to provide information on the supports available to companies in Ireland.	IDA	EI, Industry representative associations	Q4

36	Strategic promotion and marketing of Ireland's IFS sector			Q2,
	overseas			Q4
	The Communications sub-group will report on a quarterly basis to the Joint Committee on the measures being taken to promote Ireland as a location for international financial services with a focus on ensuring:	Comms group		
	the co-ordination and support of a comprehensive and consistent messaging and promotional activities across both public and private sectors; and			
	 dissemination of promotional material on Ireland's IFS offering. 			
	There will be active engagement between industry and the public sector, including a quarterly report to the Joint Committee, on overseas promotion and marketing of Ireland's IFS sector to ensure a coordinated and strategic approach to the promotion and marketing of Ireland as a centre of excellence for IFS. Elements of the marketing strategy, taking into account the uncertainty surrounding international travel and the difficulties in hosting events due to COVID-19, may include:	D/FA, D/BEI		
	 Ministerial and other official visits: promote the IFS sector to existing and growing financial services markets (virtual or in person), 			
	 Shared IFS calendar: public sector and industry representative bodies to continue to develop and share an inclusive quarterly calendar of IFS-related events, both domestic (regional) and international. 	Comms Group		
37	Liaise with the Aviation Working Group (AWG) on Cape Town Convention (Aviation) compliance matters	D/Tra	D/Fin	Q4
	The Department of Transport will act as a dedicated 'communication channel' for Ireland liaising with the Aviation Working Group on Cape Town Convention (aviation) compliance matters in order to:			
	maximise Ireland's rating on the (to be internationally published in 2020 and ongoing) AWG Cape Town Convention Compliance Index; and			
	 facilitate an effective and efficient channel for ongoing communication on compliance and related matters. 			
38	Host sustainable finance events	SNI	D/Fin, World	Q2,
	Sustainable Finance Development Day: Sustainable Nation Ireland will host a Sustainable Finance Development Day in Dublin on 4 June 2020. This will be primarily focused on an international audience and will be supported by the Department of Finance, the World Bank, and the EIT Climate-KIC.		Bank, EIT Climate-KIC, SIFI, Industry associations	Q4
	Climate Finance Week: Sustainable Nation Ireland will organise Ireland's third Climate Finance Week in November 2020 to showcase Ireland's commitment to mobilising capital market participants in support of meeting the Paris Agreement and UN Sustainable Development Goals.			

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39	Promote Ireland as a location for sustainable finance Support for the development of Ireland as a global location for sustainable finance within the current financial services ecosystem will be continued. Key to this development is the promotion of Ireland as the node for the UN Environment Programme Financial Centres	SNI	IDA, Industry associations	Q4
	for Sustainability Network (FC4S) European network and the establishment of Ireland as a global location for sustainable finance within the current financial services ecosystem.			
	The IDA and Finance Green Ireland Committee (FGI) will work with financial sector associations on promotion of the country as a location for sustainable finance through <i>Climate Finance Week</i> and updates of the sustainable finance National Roadmap.			
	The FGI Committee should coordinate and work with the Communications group to ensure the offering reflects developments in the area.			
40	Enhance linkages with global financial services centres It is imperative that Ireland improves its global position in international financial services rankings such as the WEF Global Competitiveness Index Finance Pillar and the Global Financial Centres Index to compete and grow our FDI and indigenous financial services sectors. Engaging with representative groups of leading global financial centres will provide insights and opportunities for initiatives to support Ireland's competitiveness. Financial Services Ireland will create linkages with regional and global financial centre groups.	FSI	Industry	Q4
41	Industry host a number of events at which Ireland will be promoted as a location for international financial services Industry will host a number of events to further enhance its work in promoting and Ireland as a location for IFS. Industry will work with stakeholders such as EI, IDA, D/FA in promoting Ireland for Finance.	IAC	Industry representative associations and other stakeholders, EI, IDA	Q4



Appendix 1: Progress between January and June 2020

As is noted in the Minister of State's foreword, this Action Plan for 2020, while it was prepared in later 2019, it was not taken by Government earlier this year for a range of reasons. However, a number of organisations completed work that forms part of the measures listed in this Action Plan for 2020 in the first two quarters of the year. The table below summarises the progress for those actions and reflects where priorities has shifted on account of the implications of COVID-19.

Key:

- Measure delayed
- Measure at risk of being delayed
- Measure on track
- ✓ Measure Complete

Action	n No. and Title	Lead	Deadline	RAG (Red, Amber, Green) Status
1:	EU legislative and regulatory proposals	D/Fin	Q2	G ● Measure on track
5:	Engagement on, and analysis of, Brexit and financial services issues	D/Fin	Q2	G: ● Measure on track
7 :	Increased influence at EU level: improve collaboration among Irish Industry Representative bodies in Europe	IAC	Q2	G: ● Measure on track
13:	Central Bank stakeholder engagement group	D/Fin	Q1	A: • Measure at risk of being delayed ¹
15:	Fintech Capability Programme	EI	Q2	C: ✓ Measure Complete
17:	Fintech Foresight Group	BPFI	Q2	G: • Measure on track
34:	El Inward Buyer Visit	EI	Q1	C: ✓ Measure Complete
37:	Strategic promotion and marketing of Ireland's IFS sector overseas	Comms Group and others	Q2	A: ● Measure on track²
39:	Host sustainable finance events	SNI	Q2	G: • Measure on track

¹ Measure 13 is at risk of being delayed because the pressure of other work in the first half of the year that took priority during the COVID-19 pandemic.

² Measure 37: the COVID-19 pandemic has prevented trade missions from being conducted. However, in response to the difficulties of traveling, which may continue for the rest of the year, mitigants such as the use of virtual meetings are endeavouring to meet the objective of Measure 37. On that basis, it is still considered that the underlying policy objective of this measure is being met in the circumstances.



Appendix 2: List of Acronyms

ALI: Aircraft Leasing Ireland

BPFI: Banking and Payments Federation Ireland

CBI: Central Bank of Ireland

CMU: Capital Markets Union

CSO: Central Statistics Office

 $\label{eq:def:Department} D/BEI: Department of Business,$

Enterprise, and Innovation

D/ECC: Department of the Environment, Climate

and Communications

D/FA: Department of Foreign Affairs

D/FHERIS: Department of Further and Higher Education,

Research, Innovation and Science

D/Fin: Department of Finance

D/Tra: Department of Transport

EFF: European Financial Forum

EI: Enterprise Ireland

EIT Climate-KIC: Institute of Innovation and Technology

Climate Knowledge and Innovation Community

ETFs: Exchange Traded Funds

FC4S: Financial Centres for Sustainability

FGIC: Financial Green Ireland Committee

FPAI: Finance & Payments Association of Ireland

FSI: Financial Services Ireland

FX: Foreign Exchange

HEA: Higher Education Authority

IAC: Industry Advisory Committee

IFC: International Finance Corporation

IFS: International Financial Services

ILP: Investment Limited Partnership

IMI: Irish Management Institute

INC: Insurtech Networking Centre

IoB: Institute of Banking

Irish Funds: Irish Funds Industry Association

NSAI: National Standards Authority of Ireland

NTMA: National Treasury Management Agency

PCF: Pre-approval Controlled Functions

PSCG: Public Sector Co-ordination Group

SFI: Science Foundation Ireland

SIFI: Sustainable and Responsible Investment

Forum Ireland

SNI: Sustainable Nation Ireland

UCC: University College Cork

UNEP: United Nations Environment Programme

UNEP FI: United Nations Environment

Programme Finance Initiative

WIF: Women in Finance



