



# Asia Pacific bank resolution regimes

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**C L I F F O R D**  
**C H A N C E**





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# Introduction

Five years on from the failure of Lehman Brothers (as well as other major global banks), the regulators and legislators are sharpening their focus on the development of effective resolution mechanisms for global, systemically important banks and broker-dealers.

The G20 leaders have called for the Financial Stability Board (FSB) to develop principles for effective resolution of systemically important financial institutions (SIFIs). The FSB published its **Key Attributes of Effective Resolution Regimes for Financial Institutions** which called for G20 jurisdictions to establish effective resolution regimes providing the resolution authorities with powers to resolve financial institutions beyond those already provided under general insolvency proceedings. Since the Key Attributes were published, the FSB has proposed various papers to promote and guide the global regulators on the development of an effective resolution regime (for relevant papers, see

[http://www.financialstabilityboard.org/list/fsb\\_publications/index.htm](http://www.financialstabilityboard.org/list/fsb_publications/index.htm))

Having recognised they were under-equipped to deal with the issues, the United Kingdom introduced a bank resolution regime through the Banking Act 2009, while the US introduced a regime for resolving "financial companies" (including banks and broker-dealers) through the Dodd Frank Act 2010. The European Commission has more recently been working on a Recovery and Resolution Directive, designed to promote a bank resolution regime across the European Union. Certain other countries have also implemented legislation to provide additional powers to resolution authorities. Although as this paper shows more work and reform is required for the Asia Pacific region.

# Asian Bank resolution regimes

## Key features of the insolvency and resolution regimes in selected Asia Pacific jurisdictions.

- **Australia**
- **China (PRC)**
- **Hong Kong**
- **Japan**
- **Singapore**

We set out on the following pages, tables which includes a summary of the insolvency and resolution regimes applicable to each of a local bank (**Bank**), broker-dealer (**B-D**) and local branch of a foreign bank (**Branch**). They also cover a local holding company for a bank or broker-dealer group (**Hold-co**), for structures where the ultimate parent company is a non-operating holding company, and a local unregulated service company (**Service-co**) which provides services to the Bank, B-D or Branch.

The tables focus particularly on the typical group structures of banks and broker-dealer groups in the relevant jurisdiction, and also set out a summary of any deposit guarantee scheme and depositor preference regime. Where figures are given in local currencies (e.g., for maximum amounts covered by depositor guarantee schemes) we have also provided an indicative equivalent in USD at the exchange rates at the time of publication.

The tables also provide an indication of the scope of the insolvency regimes in the relevant jurisdictions (e.g., can all global creditors of the relevant entity claim in its insolvency, only creditors of the local branch or head office, or only local creditors?), any powers the local resolution authorities may have to recognise foreign insolvency or resolution proceedings, and any proposed changes in the law.

# Australia

## Key Features:

**Local group structure and regulation:** The Australian Prudential Regulatory Authority (APRA) regulates local banks, local branches of foreign banks and local broker-dealers. It also regulates non-operating holding companies of banks.

Most local banks are established with the operating entity as the holding company. However, a smaller number of banks have adopted non-operating holding company structure. The structure of broker-dealer groups varies.

A number of Australian banks have issued contingent convertible capital or other similar instruments which comply with the requirements of Basel III.

**Deposit guarantee scheme:** The Financial Claims Scheme (FCS) covers amounts up to AUD 250,000 (USD 228,000) held with Australian banks by depositors (including natural persons, bodies corporate, partnerships etc). The FCS does not cover deposits held in local branches of foreign banks or foreign branches of local banks, and only covers deposits denominated in AUD. The scheme is not pre-funded. The Government initially provides the funds to make any payments under the FCS, and these are recovered from the relevant bank. The scheme does not cover securities.

**Depositor preference:** In the winding up of an Australian bank, the official liquidator shall pay, in priority to all other debts, any amount due to APRA in relation to amounts paid out under the FCS. Deposits covered by the FCS which were not reimbursed by the FCS rank next ahead of other creditors.

**Branch resolution regime:** There is currently no special resolution regime available in relation to Australian branches of foreign banks. The only insolvency regime available is winding up under part 5.7 of the Corporations Act. However, the extent of APRA's powers under this regime are currently unclear. Where a foreign ADI (i.e., a bank with an Australian branch) suspends payments or becomes unable to meet its obligations, the assets of the branch will be ringfenced to meet liabilities in Australia in priority to all other liabilities of the foreign bank. APRA will seek to use its powers under the Banking Act to direct the foreign ADI to ringfence the assets of the branch. However, if these directions are not followed, APRA has no power to prevent the transfer of assets out of Australia by appointing a Statutory Manager or otherwise.

**Recognition of foreign proceedings:** The Cross-Border Insolvency Act 2008 provides for recognition of foreign insolvency proceedings in relation to broker-dealers. The court may recognise any judicial or administrative proceeding where the assets are subject to control or supervision of the foreign court. For all other types of entities, recognition will be governed by the Corporations Act. The Australian courts have the power to recognise foreign insolvency proceedings on the request of a foreign court, or by issuing an ancillary liquidation order on the request of a foreign liquidator.

**Proposed changes in law:** A Treasury consultation closed on 14 December 2012 on strengthening APRA's current crisis management powers in relation to banks.

# Australia

Regime	Bank	Branch	B-D	Hold-co	Service-co
<b>General insolvency regime</b>					
Members' voluntary winding up	✓	x	✓	✓	✓
Creditors' winding up	x	x	✓	✓	✓
Winding up under part 5.7 Corporations Act	✓	✓	✓	✓	✓
Voluntary administration	x	x	✓	✓	✓
Scheme of arrangement	✓	x	✓	✓	✓
Receivership	✓	x	✓	✓	✓
<b>Specialised insolvency regime</b>					
FCS / Banking Act	✓	x	x	x	x
<b>Special resolution regime</b>					
FS(BRGR) Act	✓	x	x	x	x
<b>Other powers</b>					
Statutory manager	✓	x	x	x	x

**Case history:** Counsel is not aware of any cases where bank special resolution powers have been used. The last bank failure where depositors lost money was that of a trading bank, the Primary Producers Bank of Australia, in 1931. Since the 1930s, banking sector problems have been resolved without losses to depositors. In recent decades there have been some notable failures such as the collapse of the State Bank of South Australia and the State Bank of Victoria. However, the losses incurred by these State banks were paid for by the taxpayers of the States concerned. The State governments (as owners) had unconditionally guaranteed all liabilities (not just deposits) of these banks. A recent example of a broker-dealer failure was MF Global Australia Limited which was placed into administration on 1 November 2011. On 2 March 2012 the creditors resolved to put MF Global Australia into liquidation. The first distribution to clients was made on 31 October 2012.

# China (PRC)

## Key Features:

**Local group structure and regulation:** A Chinese bank and local branch of a foreign bank will be regulated by the China Banking Regulatory Commission (CBRC), and a securities broker-dealer will be regulated by the China Securities Regulatory Commission (CSRC). A hold-co or service-co which does not carry on any regulated activities will be subject to ordinary business licensing requirements of a corporate in China but will not be regulated by the CBRC or the CSRC.

Most Chinese banking groups have a regulated bank as the ultimate holding company of the group (e.g., Bank of China / ICBC). However, there are some groups which have an unregulated entity as the holding company (e.g., CITIC Group).

Chinese banks do not currently issue contingent convertible instruments or other similar forms of capital. However, the People's Bank of China (PBOC) is considering permitting this as part of implementation of Basel III and on 29 November 2012 the CBRC issued guidance aimed at encouraging banks to issue such instruments.

**Deposit guarantee scheme:** There is currently no deposit insurance scheme, although draft regulations establishing such a scheme are being prepared. Until this scheme is established, the government will purchase retail deposits of failed banks. This is a general protection scheme set up by the People's Bank of China for retail depositors of Chinese banks. The regime does not expressly exclude application to branches of foreign banks, but it remains unclear how this would work in practice. Under this regime, the government will purchase the lawful principal and interest of retail deposits and any securities trading settlement funds in full. There is a securities investor protection scheme in place funded by contributions from the Shanghai and Shenzhen stock exchanges and securities companies. Securities investors will be reimbursed in full and the protection scheme will participate in the insolvency proceedings as an unsecured creditor.

**Depositor preference rules:** General depositor preference rules are provided under the Commercial Banking Law. The principal and interest of retail deposits is paid in priority to other bankruptcy claims, but after (i) liquidation expenses and (ii) salaries and wages owed to employees. It hasn't been tested in practice and requires further clarification as to whether the regime would apply to deposits placed with a local branch of a foreign bank or a foreign branch of a PRC bank.

**Branch resolution regime:** There is no special resolution regime available in relation to Chinese branches of foreign banks. The only insolvency regime available would be solvent winding up. However, it is possible that the CBRC may place the branch into receivership (although this has not been tested in practice).

**Recognition of foreign proceedings:** Creditors would need to apply to the PRC courts for recognition. It is extremely rare for a foreign judgment to be recognised and enforced in the PRC even where there are strong arguments for recognition.

**Proposed changes in law:** There are proposals to develop a regime for the bankruptcy of financial institutions in China, but no clear timetable yet for implementation.

# China (PRC)

Regime	Bank	Branch	B-D	Hold-co	Service-co
<b>General insolvency regime</b>					
Solvent winding up	✓	✓	✓	✓	✓
Insolvent liquidation	✓	✗	✓	✓	✓
Reorganisation	✓	✗	✓	✓	✓
Compromise	✗	✗	✗	✓	✓
<b>Specialised insolvency regime</b>					
Compulsory liquidation	✓	✗	✓	✗	✗
Special insolvency	✓	✗	✓	✗	✗
<b>Special resolution regime</b>					
N/A					
<b>Other powers</b>					
Internal rectification, receivership and administrative reorganisation	✓	✓	✓	✗	✗

**Case history:** On 21 June 1998, PBOC announced that Hainan Development Bank could not pay its debts when they fell due. PBOC set up a liquidation committee to start liquidation proceedings. ICBC was appointed as receiver to ensure that individual depositors (both domestic and overseas) would be paid. The liquidation proceedings have not yet been completed.

On 18 October 2004, CSRC ordered Minfa Securities Co., Ltd to be put under the receivership of China Oriental Asset Management Company. Fuzhou Intermediate Court declared the company bankrupt on 28 October 2009. The resolution process was completed by the end of 2011 having paid out around RMB 11.3 billion to creditors.



# Hong Kong

## Key Features:

**Local group structure and regulation:** The Hong Kong Monetary Authority (HKMA) regulates banks and branches of foreign banks. The Securities and Futures Commission (SFC) regulates broker-dealers, as well as banks and branches of foreign banks (to the extent they carry on broker-dealer type activities). Most banking groups will have a bank as the ultimate parent entity, rather than an unregulated holding company. There is no typical structure for broker-dealer groups. The ultimate parent may be a bank or a non-operating holding company. At least one Hong Kong incorporated bank has issued contingent convertible capital, and counsel is aware that other institutions are considering issuing similar instruments.

**Deposit guarantee scheme:** The Hong Kong Deposit Protection Scheme (DPS) guarantees deposits placed with fully licensed banks which are members of the DPS up to a value of HKD 500,000 (USD 64,000) per depositor per bank under the Deposit Protection Schemes Ordinance (DPSO). The DPS guarantees both personal and corporate deposits with some limited exclusions (e.g., deposits placed by licensed banks are not protected). Restricted licence banks and deposit-taking companies are not members of DPS and so deposits held with them are not protected. The DPS has a standing funding facility from a fund established by statute to enable it to raise funds to compensate depositors. It is pre-funded and in June 2012 had net assets in excess of HKD 1.5 billion (USD 200 million) The DPS does not cover structured deposits, offshore deposits, bearer form deposits or time deposits with a maturity longer than five years. Other non-deposit financial products are also not protected.

**Depositor preference:** In the winding up of a bank in Hong Kong (including local branches of foreign banks), priority is given to depositors over other unsecured creditors, up to an amount of HKD 500,000 (USD 64,000) per depositor.

**Branch resolution regime:** There is no special resolution regime available in relation to Hong Kong branches of foreign banks. The only insolvency regime available to a Hong Kong branch would be compulsory or provisional liquidation, or a scheme of arrangement. However, the Hong Kong Monetary Authority (HKMA) or Securities and Futures Commission (SFC) would have the power to commence administrative proceedings such as appointment of a special manager.

**Recognition of foreign regimes:** The HK regulatory authorities may seek to co-ordinate any action they take with their counterparts in other jurisdictions (subject to overriding domestic concerns). However, there are no statutory provisions that govern the recognition of foreign insolvencies. Consequently, separate liquidation proceedings need to be commenced in Hong Kong – generally referred to as "concurrent liquidation".

**Proposed changes in law:** The introduction of a corporate rescue procedure has been debated in Hong Kong since the mid 1990s and legislators have also proposed to introduce a prohibition on insolvent trading. However, no implementing legislation has yet been drafted.

# Hong Kong

Regime	Bank	Branch	B-D	Hold-co	Service-co
<b>General insolvency regime</b>					
Members' voluntary liquidation	✓	x	✓	✓	✓
Creditors' voluntary liquidation	x	x	✓	✓	✓
Special voluntary liquidation	✓	x	✓	✓	✓
Compulsory / provisional liquidation	✓	✓	✓	✓	✓
Scheme of arrangement / receivership	✓	✓	✓	✓	✓
<b>Specialised insolvency regime</b>					
N/A					
<b>Special resolution regime</b>					
N/A					
<b>Other powers</b>					
Special manager	✓	✓	x	x	x
SFC restriction notice	✓	✓	✓	x	x
Injunction / appointment of administrator	✓	✓	✓	x	x

**Case history:** During the 1997 Asian financial crisis and in the 2008 global financial crisis, Hong Kong witnessed the failure of Hong Kong incorporated subsidiaries of financial institutions (e.g. Peregrine Fixed Income Limited and Lehman Brothers Hong Kong subsidiaries). Both Peregrine and the Lehman entities were placed into compulsory liquidation and are still the process of being wound up.

Following the collapse of BCCI in July 1991, the Hong Kong government began the legislative process to establish a depositor protection scheme, which was finally enacted under the DPSO in 2010.

# Japan

## Key Features:

**Local group structure and regulation:** The Financial Services Agency (FSA) regulates all Japanese banks, local branches of foreign banks and Japanese broker-dealers. It also has supervisory authority over certain holding companies of banks and broker-dealers. The ultimate holding company of a Japanese bank or broker-dealer is typically a pure holding company rather than an operating company. Counsel is not aware that any local bank has issued contingent convertible or similar capital instruments.

**Deposit guarantee scheme:** The Deposit Insurance Regime, operated and administered by the Deposit Insurance Corporation of Japan (DICJ), insures deposits placed with banks and some other types of financial institution, but not local branches of foreign banks or broker-dealers. Foreign currency deposits are also not covered.

Deposits used for payment and settlement purposes with no interest being accrued are insured for the full amount of the deposit. Any other deposit will be covered up to JPY 10,000,000 (USD 103,000) together with interest accrued thereon. The DICJ also plays a leading role in the initiation and management of resolution and insolvency processes for insured institutions. There is also an Investor Protection Fund Regime which covers customers of Japanese Type 1 broker-dealers for claims up to JPY 10,000,000 (USD 103,000) per person.

Both these regimes are funded by fees paid annually by insured institutions. For 2012, the total paid by insured institutions was around JPY 606 billion (USD 6.2 billion) and DICJ reserves were around JPY 1,030 billion (USD 10.6 billion)

**Depositor preference:** Japan has no depositor preference regime, and unsecured deposits would rank pari passu with other unsecured claims.

**Branch resolution regime:** There is no special resolution regime available in relation to Japanese branches of foreign banks. However, the assets in Japan of a foreign bank may be liquidated to meet the claims of creditors in Japan.

**Recognition of foreign proceedings:** The Act on Recognition and Assistance for Foreign Insolvency Proceedings (**ARAFIP**) enables the Japanese courts to recognise court-based foreign insolvency proceedings which are equivalent to Bankruptcy, Civil Rehabilitation, Corporate Reorganisation or Special Liquidation.

The foreign bankruptcy trustee or a debtor may apply to the Tokyo District Court for recognition. Once the proceedings have been recognised, the Court may issue certain orders to facilitate the implementation of the foreign insolvency proceedings in relation to assets of the relevant entity in Japan.

**Proposed changes in law:** On 28 January 2013, the Financial System Council published a report on the reform of resolution regimes for financial institutions, based on the FSB's Key Attributes. Draft laws were submitted to the Diet in April 2013 and passed in June 2013. The laws are expected to enter into force in 2014.

# Japan

Regime	Bank	Branch	B-D	Hold-co	Service-co
<b>General insolvency regime</b>					
Bankruptcy	✓	✓	✓	✓	✓
Civil rehabilitation	✓	✓	✓	✓	✓
Corporate reorganisation	✓	✓	✓	✓	✓
Special liquidation	✓	✓	✓	✓	✓
<b>Specialised insolvency regime</b>					
Amended bankruptcy	✓	x	✓	x	x
Amended civil rehabilitation	✓	x	✓	x	x
Amended corporate reorganisation	✓	x	✓	x	x
Special liquidation for foreign bank branches	x	✓	x	x	x
<b>Special resolution regime</b>					
Financial administrator regime	✓	x	x	x	x
Capital injection / financial aid / nationalisation regimes	✓	x	x	x	x
<b>Other powers</b>					
N/A					

**Case history:** On 15 September 2008, the FSA issued an administrative order to Lehman Brothers Japan, Inc (**LBJ**) requiring it to hold sufficient assets in Japan to meet its liabilities. This was followed by an order for LBJ to suspend its business. On 16 September LBJ filed for commencement of civil rehabilitation proceedings. The Tokyo District Court issued the commencement order three days later. Civil rehabilitation is normally used to rehabilitate a company. However, the company is also permitted to dispose of its assets and be liquidated even under civil rehabilitation proceedings. LBJ disposed of its assets to Nomura Holdings on 29 September 2008 and was dissolved the same day. The proceeds of the sale were distributed to creditors.



# Singapore

## Key Features:

**Local group structure and regulation:** The Monetary Authority of Singapore (MAS) regulates all Singaporean banks, branches of foreign banks and financial holding companies if MAS considers the latter to affect monetary stability and credit and exchange conditions in Singapore, the development of Singapore as a financial centre or the financial situation of Singapore generally. MAS also licenses and regulates broker dealers. MAS is currently reviewing whether to introduce a regulatory framework for financial holding companies which do not carry out any activities in Singapore but merely hold as subsidiary a Singapore incorporated bank or insurance company. Several major Singapore banks have issued contingent convertible capital instruments.

**Deposit guarantee scheme:** The Deposit Insurance Scheme (DI Scheme) guarantees insured deposits placed with scheme members up to a value of SGD 50,000 (USD 40,000). Every full bank with a valid MAS licence (including local branches of foreign banks which meet this definition) automatically becomes a member of the DI Scheme and is required to fund the scheme by paying an annual premium to the Deposit Insurance Fund (DI Fund). The DI Scheme does not cover structured deposits or any deposits made by another bank or a person who carries on business activities outside Singapore which, if conducted within Singapore, would require a banking licence. The DI Scheme only covers deposits in Singapore dollars.

**Depositor preference:** In the event of a winding up of a bank or local branch of a foreign bank, priority will be given to the following liabilities in Singapore: (i) any premium contributions due and payable to the DI Fund; (ii) liabilities in respect of insured deposits under the DI Scheme up to the amount of compensation paid or payable out of the DI Fund; (iii) non-bank customer deposits. The preference covers both retail and wholesale deposits in any currency, but does not extend to deposits placed with foreign branches of Singaporean banks. The assets of that bank or branch in Singapore shall be ring-fenced so they are available to meet all liabilities incurred in Singapore.

**Branch resolution regime:** In general the insolvency and resolution proceedings available to a Singapore bank will also be available to a Singapore branch of a foreign bank, with the exception of voluntary winding up and judicial management.

**Recognition of foreign regimes:** Singapore is not currently party to UNCITRAL and so is not obliged to recognise foreign insolvency regimes. The Singapore courts may only assist foreign courts or foreign liquidators if their actions or rulings are consistent with the domestic Singapore insolvency framework, which includes adherence to Singapore's ring-fencing provisions regarding the assets of insolvent banks.

**Changes in law:** With effect from 18 August 2013, the MAS (Amendment) Bill and Financial Institutions (Miscellaneous Amendments) Bill amended the Monetary Authority of Singapore Act to expand the resolution regime to cover other financial institutions and material non-operating entities in a financial group and give additional powers to MAS. The Singapore Government has also indicated that it will consolidate and refine Singapore's bankruptcy and insolvency legislation into an omnibus insolvency act. No draft legislation has been introduced to date.

# Singapore

Regime	Bank	Branch	B-D	Hold-co	Service-co
<b>General insolvency regime</b>					
Compulsory winding up	✓	✓	✓	✓	✓
Compulsory winding up of unregistered co.	x	✓	x	x	x
Voluntary winding up	✓	x	✓	✓	✓
Scheme of arrangement	✓	✓	✓	✓	✓
Receivers and managers	✓	✓	✓	✓	✓
Judicial management	✓	x	✓	✓	✓
<b>Specialised insolvency regime</b>					
Bank insolvency	✓	✓	x	x	x
<b>Special resolution regime</b>					
Special Resolution Regime	✓	✓	✓	✓	✓
<b>Other powers</b>					
N/A					

**Case history:** In November 2011, Provisional Liquidators were appointed for MF Global Singapore Pte Limited (**MF Global**). In May 2012, the sole shareholder of MF Global Singapore Pte Limited passed a special resolution for the voluntary winding up of the company and appointed joint and several Liquidators. This was a creditors' voluntary liquidation. The liquidation is currently ongoing.

In March 2012, Lehman Brothers Singapore Pte Ltd (**LBSPL**) and Lehman Brothers Pte Ltd (**LBPL**) were placed in members' voluntary liquidation. The liquidations of both LBSPL and LBPL are currently ongoing.

In February 1995, the High Court appointed interim judicial managers of Baring Futures (Singapore) Pte Ltd (**BFS**) on the application of SIMEX, now known as The Singapore Exchange Ltd on the basis that BFS – a SIMEX clearing member – was or would be unable to pay its debts. BFS was subsequently liquidated.

# Summary overview

	Special resolution regime for banks?	Specialised insolvency regime for banks?	Regime for winding up local branches of foreign banks?	Deposit guarantee / insurance?	Depositor preference?	RRPs required?	Changes proposed?
<b>Australia *</b>	✓	✓	✓ (winding up, ancillary liquidation)	✓ up to AUD 250,000 (USD 228,000) (ex post funded)	✓ (local deposits in AUD) #	✓	Under consultation
<b>China (PRC) *</b>	✗	✓	✓ (solvent winding up, receivership)	✓ (Government funded)	✓ (local deposits, retail only). But no detailed rules yet	Proposed	Proposed
<b>Hong Kong</b>	✗	✗	✓ (liquidation, scheme of arrangement)	✓ up to HKD 500,000 (USD 64,000) (pre-funded)	✓ (local deposits, retail and wholesale) #	✗	✗
<b>Japan *</b>	✓	✓	✓ (general insolvency regimes, special liquidation)	✓ up to JPY 10,000,000 (USD 103,000) (pre-funded)	✗	✓	Proposed
<b>Singapore</b>	✓	✓	✓ (bank insolvency, winding up, scheme of arrangement, special resolution)	✓ up to SGD 50,000 (USD 40,000) (pre-funded)	✓ (local deposits, retail and wholesale)	✗	Changes to the insolvency law have been recommended but no legislation passed yet

\* G20 jurisdiction

# subject to monetary cap



## Special resolution regimes





# Special resolution regimes (key features)

	Australia	Japan	Singapore
<b>Legislation</b>	Financial Sector (Business Transfer and Group Restructure) Act 1999	Deposit Insurance Act (Act No. 34 of 1971)	Part VII and VIIA Banking Act
<b>Covered entities</b>	Bank	Bank	Bank
<b>Applicable to local branches?</b>	No (but under consultation)	No	Yes
<b>Resolution authority</b>	APRA	<ul style="list-style-type: none"> <li>■ DICJ / FSA (Financial Administrator Regime)</li> <li>■ DICJ / Prime Minister (Capital Injection, Special Financial Aid, Nationalisation)</li> </ul>	MAS
<b>Conditions for resolution</b>	Where a bank is likely to become unable to meet its obligations or is about to suspend payment	<ul style="list-style-type: none"> <li>■ Financial Administrator Regime: where a systemically important bank will not be able to pay its debts or may suspend payments;</li> <li>■ Capital Injection: where a systemically important bank is neither a failed institution nor unable to pay its debts;</li> <li>■ Special Financial Aid / Nationalisation: where a systemically important bank is a failed institution and / or is unable to pay its debts</li> </ul>	Where a bank becomes or is likely to become insolvent or unable to meet its obligations, or where MAS considers it in the public interest to resolve the bank



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# Contacts

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