

**REPUBLIC OF THE MARSHALL ISLANDS
LICENSING AND FEES FOR BANKS AND FINANCIAL SERVICES PROVIDERS
TITLE 17- BANKS AND FINANCIAL INSTITUTIONS
CHAPTER 1- BANKING**

PART I – AUTHORITY, PURPOSE, AND DEFINITIONS

Section 1. Authority.

The Republic of the Marshall Islands Banks and Financial Services Providers Licensing and Fees Regulations 2020 (the “Regulations”) are made and promulgated by the Banking Commissioner pursuant to, 17 MIRC Chapter 1, Section 156 of the Banking Act 1987 (“Act”).

Section 2. Citation.

These Regulations may be cited as the “Banks and Financial Services Providers Licensing and Fees Regulations 2020” and shall come into effect after adequate opportunity is given to banks to make representation on these Regulations. Adequate opportunity will also be given to financial services providers to make representation on these Regulations although it is not required under Section 156 and Part VI of the Act.

Section 3. Purpose.

These Regulations are intended to prescribe the procedure for applying for Banks and Financial Services Providers licenses and other matters required to be prescribed pursuant to the Act.

Section 4. Definitions.

Terms used in the Regulations that are used also in the Act shall have the same meaning as used in the Act.

- i. Applicant- means any individual or group of people who have been assigned to apply on behalf of the bank or financial service provider;
- ii. Bank- means any person or body of persons or a corporation engaged in banking business and includes savings and loan associations, but does not include a credit union;
- iii. Banking business- means the business of receiving funds from the public through the acceptance of money deposits which may be withdrawn or repaid by check or order, and the use of such funds either in whole or in part for advances, investments, or any other operation either authorized by law or customary banking practice;
- iv. Branch- means an office of a bank transacting banking business and maintaining its own accounting records;
- v. Cash dealer- which also includes agents of foreign cash dealers that operate in the Republic;

- a) Insurer, insurance broker or insurance intermediary;
 - b) Securities dealer or futures broker; person who carries on business of dealing in bullion or precious metals;
 - c) A person who carries on a business of collecting, holding or delivering cash as part of a business or providing payroll services;
 - d) An operator of gambling house, casino, or lottery;
 - e) A person carrying on business as currency exchanger or currency dealer.
- vi. Commissioner- means the Commissioner of Banking appointed under the provisions of the Act;
- vii. Domestic bank- means a bank established or incorporated in the Republic;
- viii. Domestic license- means a license issued to conduct banking business in the Republic;
- ix. Financial institutions- means a person who carries on a business of the following, which also includes agents of foreign financial institutions operating in the Republic:
- a) Acceptance of deposit and other repayable funds from public;
 - b) Lending, including consumer credit, mortgage credit, factoring and financing of commercial transactions;
 - c) Financial leasing;
 - d) Money transmission services or money transfer operators;
 - e) Issuing and administering means of payment such as credit cards, travelers' checks, banker's drafts, guarantees and commitments, trading for own accounts or for account of customers in money market instruments such as checks, bills, certificates of deposits, foreign exchange;
 - f) Issuing financial futures and options, exchange and interest rate instruments, and transferrable securities;
 - g) Underwriting share issues and participating in such issues;
 - h) Money brokering, portfolio management and advice, safekeeping and administration of securities, credit reference services, and safe custody services;
 - i) Foreign exchange- means a person who carries on a business as a currency or money exchanger.
- x. Financial services businesses- means any services provided by a person as described under Subsections 4(v), 4(ix), and 4(xiii) of these Regulations.
- xi. Foreign bank- means a bank established or incorporated outside the Republic;
- xii. Foreign bank branch- means a branch of a foreign bank that is licensed to operate in the Republic to carry out banking business;

- xiii. Financial services providers- means any person who carries on a business as a domestic financial institution, other than a bank, or a cash dealer as defined under Section 102 of the Act, including a person who offers financial products, which may include virtual assets, or advises and provides mediation services, provides reinsurance mediation services, or money lenders, or act as authorized agent of financial products such as fund managers, pension or retirement funds excluding the social security system of the Marshall Islands, credit unions, financial advisers, insurers, development finance institutions privately operated or government-owned, finance companies;
- xiv. Licensed bank- means a bank licensed under the provisions of the Act;
- xv. Local banking business- means conducting banking business in the Republic with a domestic license;
- xvi. Organizers- means board of directors or senior managers of a proposed domestic bank or branch manager of a foreign bank branch who have been designated with task to apply for bank license on behalf of the bank. For financial services providers, proposed members of the board of directors or managers of the financial service provider;
- xvii. Person- means an individual, company, corporation, partnership or any-body incorporate or unincorporated and includes every director, manager, agent, or secretary of such person;
- xviii. Place of business- means any branch or office of a licensed bank in the Republic including a mobile office.

Section 5. Application.

These Regulations shall apply to all banks and financial services providers operating or intending to operate in the Republic of the Marshall Islands. Banks and financial services providers as defined under Section 102 of the Act are subjected to these Regulations.

PART II – FEES

Section 6. Fees.

- 1) All related fees for banks and financial services providers are specified in Schedule 1 of these Regulations and shall be paid to the Banking Commission Fund at the Ministry of Finance Treasury Department in accordance with Sections 111 and 126 of the Act;
- 2) Immediately upon payment of fees in Section 6 (1), Applicant should present receipt of payment to the Banking Commission Office, Financial Institution Supervision where a copy of receipt will be made and filed.

- 3) All license renewal fees for banks and financial services providers shall be paid prior to the end of September of each year and for new licenses, fees must be paid prior to commencement of operations or as specified in these Regulations;
- 4) Payment of fees, including license renewal fees are to be paid in accordance with Schedule 1 of these Regulations.

PART III – LICENSING REGIME FOR BANKS

Section 7. License Application Procedures

- 1) A domestic or foreign bank applicant should pay close attention to information requirements in Section 108 of the Act. An application for a license must be in writing using the English language, signed by the Chief Executive Officer, and submitted with a nonrefundable application fee of \$500 and to be paid in accordance with Part II Section 6 (1) of these Regulation (Section 108 1o) along with the following information required under Section 108 of the Act:
 - a) Domestic Bank:
 - i. Name and Location(s) – Indicate name of the proposed bank and address where its head office will be located in the Marshall Islands (Section 108 1a);
 - ii. Legal Documents – Submit two certified copies of domestic bank’s Articles of Incorporation and By-Laws (Section 108 1b). A domestic bank is required to be incorporated under the Corporations, Partnerships and Associations Act (Association Law);
 - iii. Financial Statements – A domestic bank must provide a certified balance sheet, indicating the capital invested would meet the minimum standard set in Section 120 of the Banking Act (Section 108 1g). It must in particular report the number of shares outstanding, the amount of authorized and paid-up for each class of share outstanding (Section 108 1c). The application must also indicate the financial year –end (Section 108 1i) and the name, address, and professional qualification of the independent auditor (Section 108 1h);
 - iv. Business Plan- A domestic bank must submit a business plan pertaining to its’ first three years of operations (Section 108 1m). A suggested outline of the business plan is given in Schedule 2 these Regulations;
 - v. Shareholders – Report the full names, permanent addresses, nationalities and occupations of persons who subscribed for or intend subscribing to 10% of the capital to be issued (Section 108 1d). The Commissioner will identify such additional information required to assess the financial standing, banking experience and reputation of 10% and above shareholders, directors and the principle officer of the proposed bank (Section 108 1e).

These requirements would necessarily be much more demanding in the case of an application that is new to banking than one that has a solidly based reputation;

- vi. Directors – Further to the detailed information applicable to large shareholders above (Section 108 1e), the investigation of directors centers on their banking experience and financial standing (Section 108 1f), including disclosure of their other business interests;
 - vii. Executive Officers – Information pertaining to the Chief Executive Officer of the bank in the Marshall Islands and his deputy is the same as for each director. (Sections 1081e and 1081k). A major aspect of this information relates to the banking experience of such officers, whereby the applicable curriculum vitae of the senior officers are to be submitted;
 - viii. Business Description – If the intention is to apply for a domestic license to do “general banking,” indicate the place(s) in which the bank intends to operate and the specific type of banking business in which it is to operate (Section 108 1m). Alternatively, if the intention is to offer broader banking services, for instance involving the exercise of trust powers (Section 108 1j), the type of related banking services is to be separately described and also indicate whether or not it is to exercise trust powers;
 - ix. Subsidiaries – The names, addresses and types of business of each subsidiary of the bank;
 - x. Deposit Insurance – A letter to be submitted from the Federal Deposit Insurance Corporation of the United States of America, or other approved body under Section 151 of the Act, indicating the current insurance covering deposits held.
- b) Foreign Bank
- i. Name and Location(s) – Indicate name of the proposed foreign bank branch and address where its’ principal office of business will be located in the Marshall Islands (Section 108 1a);
 - ii. Legal Documents – Submit two certified copies of foreign bank’s Articles of Incorporation and By-Laws (Section 108 1b).
 - iii. Authorized and Paid Up Capital- The amounts of authorized capital and paid up capital, and the number and class of shares held by shareholders or subscribers;
 - iv. Trust Powers- applicant must submit a statement to explain whether or not the foreign bank branch it to exercise trust powers;
 - v. Subsidiary Corporation- The name of each subsidiary corporation of the foreign bank, and their addresses and the types of businesses they are engaged;

- vi. Business Description- Provide a description of the proposed foreign banking branch's types of business it is to be engaged in and its' objectives and the place where it intends to do business;
 - vii. Deposit Insurance- Provide a letter of document from the Federal Deposit Insurance Corporation of the United States, or from another deposit insurance system that has been approved pursuant to Section 151 of the Act, indicating the current insurance covering deposits held by the foreign bank;
 - viii. An initial non-refundable application fee of \$500 is to be paid in accordance with Part II Fees of these Regulations.
 - ix. Shareholders Information- Provide the full names, addresses, occupations and nationalities of shareholders each owning more than ten percent (10%) of the issued stock of the foreign bank, certified by the bank's secretary;
 - x. Foreign Bank Branch Manager and Deputy- Provide the full names and banking experience of the manager of the foreign bank branch in the Republic and his deputy;
 - xi. Annual Report and Audited Financial Statements- Provide the latest annual report and audited financial statements of the foreign bank. Financial statements shall provide two (2) year figures and show that the foreign bank's capital complies with the requirements under Section 120 or Section 124 of the Act as applicable;
 - xii. Letter from Home Supervisor- Provide a letter from the Home Supervisor responsible for the country where the bank is chartered confirming that the applicant is being supervised on a consolidated basis. Letter should also indicate that there is no objection to the establishment of a branch of the foreign bank in the Republic;
 - xiii. Certificate of Corporate Registration- Provide a copy of the certificate of corporate registration in the Republic.
- 2) Pursuant to Section 109 of the Act, on receipt of the complete set of documents required under Section 108 of the Act, the Commission shall conduct an investigation of the application as deemed necessary to determine the following:
- a) To ensure that all relevant legal requirements have been met;
 - b) To review the adequacy of financial resources, organization, controls and administration of the proposed bank or foreign bank branch- in addition to the set of information requested under Section 108 of the Act, the organizers should also submit the proposed domestic or foreign bank's organizational chart, functions, and policies and procedures, which should also include a description of risk management systems, compliance and audit functions and how they are to operate to manage risks within the bank;

- c) Assess the integrity and banking experience of the organizers- in addition to information required under Section 108 of the Act, the organizers should also submit personal financial statements for example balance sheets for each individual members of the Board of a domestic bank, the chief executive officer and his deputy. For a foreign bank branch, the personal balance sheet for the foreign bank branch manager and his deputy. Any supporting documents to show evidence of previous banking experience or qualification should also be attached to information required under Section 108 of the Act, such as bank management training certificates or diplomas.
- d) The Commissioner will make a preliminary review on receipt of the completed application to check the quality and completeness of the submission. In the event of deficiencies, the organizers would be promptly notified, which could delay commencing the investigation. Investigation will commence immediately after all documents and information have been provided to the satisfaction of the Commissioner. It may take up to 90 days or longer for investigation to complete from the formal application date depending on completeness and quality of information received.
- e) The Commissioner may authorize any other officer of the Banking Commission to assist in collecting and investigating any document provided by the organizers for the purpose of applying for a bank license.
- f) Organizers should prepare a presentation to provide more detail on the business and should be done in preliminary meetings with the Commissioner or officers assigned during the period of investigation and when requested to do so. Key elements of business to present and elaborate further on are budgeting, financial pro-forma statements and projections, banking experience of proposed Board members and senior managers, and for foreign bank branch banking experience of proposed branch manager and his deputy, ownership, control, financial resources, its' current and prospective financial condition, contingent resources available in an emergency and the likelihood of it being able to profitably meet the needs and convenience of the domestic market.

Section 8. Approval and Granting of License

- 1) On completion of the due diligence investigation, the Commissioner, with the approval of Cabinet shall refuse or grant the license (Section 109 (2) of the Act). If it is not approved, no reason needs to be given to the organizers but a letter must be issued to the organizers to state the decision;
- 2) With the approval of Cabinet, the Commission shall specify and confirm the bank's engagement in local banking business, in the form of a letter issued to the bank after approval of license. The Commissioner may also specify any terms and conditions which shall be complied with by the bank and such terms the Commissioner may impose, add, vary, or remove to the existing conditions of license;

- 3) The Commission should inform the licensed bank of his intention to issue, amend, or remove terms and conditions of the licensed bank and afford it 14 days to make representations in this regard. Based on the licensed bank's comments the Commissioner may take these into account in deciding whether to proceed with the issue of the notice;
- 4) The bank should ensure that a copy of the license granted by the Commissioner shall be displayed conspicuously in all places of business of the bank in the Republic, including bank branches set up by the domestic and foreign bank;
- 5) No license shall be issued or renewed except upon the payment of the license fee as referred to in Section 111 of the Act and further specified in Schedule 1 of these Regulations. Payment instructions of fees shall be complied with in accordance with Part II Section 6 of these Regulations;
- 6) A licensed bank shall not engage in any other banking business other than the business specified in the license and the bank may proceed to operate banking business unless revoked pursuant to Section 113 of the Act;
- 7) In accordance with Section 110 (6) of the Act, the application for renewal shall be made prior to the expiration of the current license along with the license fee referred to in Section 111 of the Act or prior to end of September of each financial year. For new applications, license fee should be paid, immediately after the approval of the bank license, and prior to granting of license and as specified in Schedule 1 of these Regulations. If a bank license has been approved prior to the end of September 30 of each year, then the annual license fee should be paid to the Banking Commission Fund to cover the remaining year and the same annual license fee is to be paid for license renewal for the next financial year in accordance with Schedule 1 of these Regulations and Part II Section 6 of these Regulations.

Section 9. Suspension, Revocation, or Variation of License

A bank license for a domestic bank or a foreign bank branch will be suspended, revoked, and varied if the bank fails to commence operation within six (6) months following the granting of license or for any other reason specified under Section 113 of the Act;

PART IV- LICENSING REGIME FOR FINANCIAL SERVICES PROVIDERS

Section 10. Requirements for License

- 1) No financial service provider shall transact business or operate in the Republic except by a corporation or entity which is in possession of a valid license issued by the Commissioner of Banking, authorizing the transaction of financial services business in or within the Republic;
- 2) The Commissioner shall be authorized to examine or authorize any officer to examine the books, records, accounts of the financial services provider to ensure compliance with relevant provision of the Act in particular Part VI of the Act and any other Regulations promulgated under the Act that pertains to the operation of financial services providers.
- 3) Any person that wants to obtain approval for a license as a financial service provider shall apply in writing to the Commissioner of Banking and must submit the following requirements within a date that is to be set by the Banking Commissioner:
 - a) Business License- must submit all relevant business license issued by the RMI Government, Local Government, or if foreign business, should provide foreign business license including EIN by the Marshal Islands Social Security System;
 - b) Legal Documents- must submit article of incorporation, by laws, and any other relevant legal document including agent agreement for foreign owned companies that operate through an agent in the Republic;
 - c) Financial Statements- must submit a most recent certified audited financial statement including balance sheet;
 - d) Organizational Structure- must submit an updated organizational structure that clearly delineates roles and reporting lines of the organization;
 - e) Beneficial Owners- need to provide actual names of natural persons who ultimately owns or controls the corporation or entity that operates as a financial service provider. Organizer(s) should also provide valid IDs of each beneficial owner;
 - f) Application Fee- must pay a non-refundable fee of \$300 to the Banking Commission Fund and in accordance with Part II Section 6 of these Regulations.

Section 11. Grant or Refusal of License

- 1) The Commissioner shall conduct an investigation of the application as deemed necessary to determine the following:

- a) That all requirements of existing laws and regulations have been complied with. This will require a comprehensive review of the set of documents and information provided under Section 10(2) of these Regulations and ensuring that such information and any other information submitted by organizers for the purpose of the license application are in compliance with applicable laws and regulations in the Republic;
 - b) Whether the available financial resources, organization, controls, administration and integrity and financial services business experience of the organizers can reasonably assure the safe and sound operations of the proposed financial service business and that it can effectively serve the needs of the Republic;
 - c) Upon completing the investigation, the Commissioner shall grant, or without assigning any reason therefore, refuse to grant a license to the proposed financial service business.
- 2) It may take up to 60 days or two (2) months for the Commissioner to complete the investigation depending on the quality of documents and information submitted by organizers.

Section 12. Financial Service Provider License

- 1) Terms of the license may be specified by the Commissioner when a license is issued to a Financial Service Provider under which it shall be complied with;
- 2) No person may be granted a license in a name which, in the opinion of the Commissioner, is likely to mislead or confuse the persons for which it is intended to provide any or all of its services- For example, names such as Quick Loan Insurance Agency or Money Transfer Commercial Bank, etc.
- 3) No license shall be issued or renewed except upon payment of the license fee and other associated fees specified by Schedule 1 of these Regulations;
- 4) A licensed Financial Services Provider shall not engage in any financial services provider business other than the business specified in the license- the Commissioner may specify types of businesses allowed in addition with proposed business type submitted by organizer for the purpose of this application;
- 5) A license granted for the purpose of operating a financial service business shall remain valid unless revoked, suspended, or varied in accordance with Section 128 of the Act;
- 6) The application for license renewal shall be made prior to expiration of the current license along with the license fee as specified in Schedule 1 of these Regulations and shall be paid before the end of September of each fiscal year or for a new license immediately after approval of license and before commencement of operation, license will not be issued until

new license fee has been paid by organizers- payment of license fees should be made consistent with instructions under Part II Section 6 of these Regulations;

- 7) A copy of the license shall be kept displayed conspicuously in all place of business of the Financial Services Provider- The Financial Service Business may duplicate copies of license for this purpose;
- 8) The Commission may from time to time by notice in writing to a licensed Financial Services Business impose new or additional conditions of license consistent with Section 12 (1) above or may vary or remove any existing conditions of license, or add to any such conditions;
- 9) The Commissioner shall inform the licensed Financial Services Provider of his intention to impose new or additional conditions of license or vary or remove any existing condition and afford it a period of seven (7) days in which to make representations in this regard, the Commissioner will take into account any such representations in deciding whether or not to proceed with the issue of the notice- the Licensed Financial Services Provider shall respond in writing to the Commissioner to make representation in this respect.
- 10) The Commissioner may suspend, revoke, or vary the license of the licensed Financial Services Provider for the reasons stipulated under Section 128 of the Act or if it fails to commence operation after 3 months of receiving its license.

Section 13. Assessment of Civil Money Penalties

- a) In accordance with Section 164 of the Act, every person who contravenes or fails to comply with a of the provisions of the Act or any rule, regulation, order, direction or requirement made or given in the Act shall be guilty of an offense and shall upon conviction be liable to a fine not exceeding \$10,000;
- b) The Banking Commissioner shall refer all violations under the Act to the Office of the Attorney General for enforcement proceedings in the High Court of the Republic of the Marshall Islands, and all monies collected shall be deposited into the Banking Commission Fund within the National Treasury of the Republic.

SCHEDULE 1- LICENSE FEES AND OTHER FEES

Licensed Reporting Entity Type	Fee	Purpose/Reference in Act
Banks (domestic and foreign)	1. \$25,000	1. Domestic and Foreign banks- annual license fee need to be paid before September 30 each year or immediately after approval of new license and before commencement of operation- main foreign bank branch is subject to this fee (Section 111 of Act)
	2. \$1,500	2. Domestic and Foreign banks- for each branch or when opening new branch in the Republic, also applies to any additional branch of the main foreign bank branch in the Republic (Section 112 of Act)
	3. \$1,500	3. Domestic and Foreign banks- to close a branch in the Republic (Section 112 of Act)
	4. \$1,500	4. Domestic banks- to open or close agency or office or change location of place of business in Republic (Section 112 of Act)
	5. \$2,000	5. Domestic banks- to open a branch, agency or office in any place outside the Republic (Section 112 of the Act)
	6. \$2,000	6. Domestic banks- to acquire business of another bank or of any branch of another bank (Section 112 of the Act);
	7. \$1,000	7. Domestic banks- when persons, group of persons, partnerships, company or corporations acquire substantial interest in a domestic bank (Section 112 of the Act)
	8. \$2,000	8. Foreign bank- to open a representative office or such type of office of business in the Republic (Section 112 of the Act)

Licensed Reporting Entity Type	Fee	Purpose/Reference in Act
Banks (domestic and foreign)	9. \$1,000 10. \$50,000 11. \$800 12. \$500 per person 13. \$1000 14. \$1,500 15. \$500	9. Domestic banks- to establish a subsidiary corporation (Section 119 of the Act) 10. Domestic banks- to reduce paid-up capital (minimum \$1 million- Section 120 of the Act) 11. Domestic and Foreign banks- annual appointment of independent financial auditor (Section 134 (1) of the Act) ¹ 12. Domestic banks- to change Directors or Principal Officers (Section 140 of the Act) 13. Domestic banks- to sell, transfer, or dispose of its capital stock to any one person, who upon acquiring stock, would hold more than 10% of the stock issued by the bank (Section 148 of the Act) 14. Domestic banks- to change its name or authorized capital (Section 149 of the Act) 15. Domestic and Foreign banks- license application fee
Non-Bank Lenders or Finance Companies ²	1. \$5,000 2. \$300	1. Annual License Fee- need to be paid before end of September 30 of each year 2. License application fee

¹ For new appointment of independent financial auditors or if will retain financial auditor- still need to request approval from Commissioner and pay annual fee.

² Includes those that are non-deposit taking and provide consumer credit, mortgage credit, factoring or financing of commercial transaction

Licensed Reporting Entity Type	Fee	Purpose/Reference in Act
Money Transfer Operators	\$1,000	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee
Money Exchanger	\$1,000	Annual License Fee- need to be paid before end of September 30 each financial year
	\$300	License application fee
Insurance ³	\$1,000	Annual License Fee- need to be paid before end of September 30 of each year
	\$300	License application fee
Precious Metal Dealers	\$900	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee
Gambling House or Casino ⁴	\$900	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee
Securities Dealer or Futures Broker	\$1,000	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee
Other Financial Services ⁵	\$1,000	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee
Credit Unions ⁶	\$900	Annual License Fee- need to be paid before end of September 30 of each financial year
	\$300	License application fee

³ Insurer, insurance broker or insurance intermediary, reinsurance mediation services

⁴ Includes lottery operator

⁵ Can be any business that provides underwriting of shares and participating in such issues, money brokering, portfolio management and advice, safekeeping and administration of securities, credit reference service, and safe custody services, virtual asset service provider, fund managers, pension or retirement funds.

⁶ a nonprofit-making money cooperative whose members can borrow from pooled deposits at low interest rates.

SCHEDULE 2- BUSINESS PLAN OUTLINE

A realistic business plan is an essential prerequisite for assessing the relative merits of each application. The business plan should minimally cover the following aspects:

- Organization Chart giving names, titles, responsibilities of all senior officers for the proposed company. In the case of foreign branch, also describe reporting lines as they relate to the head office executive structure;
- List particulars of the services the bank proposes conducting, indicating how they will meet the perceived needs of the community;
- Provide balance sheet and income statement projections during each of the initial three years of operations. Disposition of preopening costs are to be separately identified;
- Outline the salient assumptions in support of the foregoing balance sheet and income statement projections;
- Note the amount and source of initial capital to be invested, projected capital adequacy standards and potential capital source for meeting unexpected contingencies;
- Describe the policy framework for dividend payments to the owners of the bank, in context of the above three-year projections. In the case of a foreign branch bank operation, describe the policy framework pertaining to the reimbursement of its parent over the same period.