

Industry Supervision



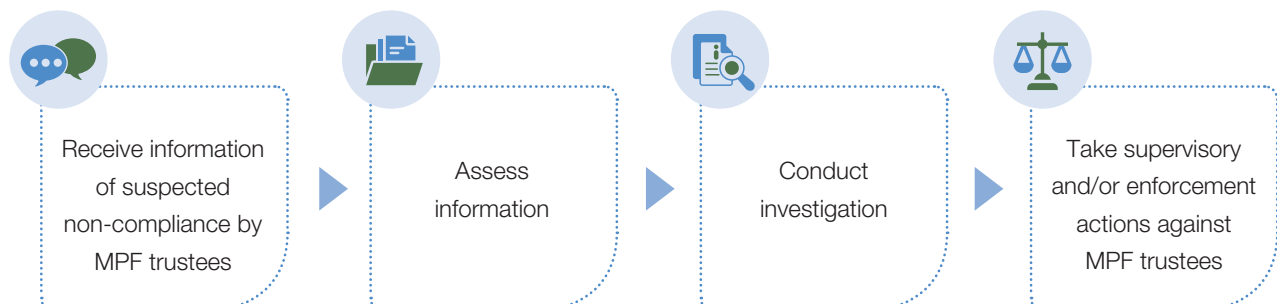
*Meeting with
CEOs of MPF trustees*

MPF Trustees

MPFA takes regulatory measures to supervise MPF trustees in developing good corporate governance, proper risk management and a strong compliance culture within their organizations.

Surveillance and Monitoring

MPFA adopts a proactive and risk-based approach in monitoring and supervising trustees. We assess and oversee trustees' compliance and detect potential weaknesses. In respect of areas of concern, circulars, newsletters and reminders are issued to trustees providing them with guidance. Supervisory and/or enforcement actions are taken as appropriate. In respect of suspected non-compliance cases, we conduct investigation and make regulatory responses having regard to the nature and scope of the cases.



Supervisory and Enforcement Actions against Trustees

	2024–25
Circulars issued in relation to regulatory and operational concerns	6
Reminders issued in relation to compliance, scheme administration and other MPF issues	12
On-site inspections conducted in relation to trustees' onboarding to the eMPF Platform (eMPF)	10
Supervisory letters issued in relation to scheme administration and investment non-compliance cases	24
Notices and supervisory letters issued in relation to governance, on-site inspection findings, provision of annual benefit statements, and required actions for eMPF onboarding	25
Enquiries handled in relation to scheme administration, investment and fund operation	208
Complaints about service quality	292
Complaints about suspected non-compliance	60
– Total complaints received	352
Investigation cases initiated	2
Financial penalty notices issued on non-compliance ¹ related to scheme administration	9
– Total amount fined	\$2,490,000
– Trustees penalized	3

Governance of MPF Trustees

Good governance is an essential element of an efficient and effective pension system. Promoting a high standard of governance among MPF trustees has always been MPFA's key regulatory objective.

In January 2023, MPFA issued a circular setting out the common observations identified from trustees' implementation of the "Governance Principles for MPF Trustees" (details are available on [the MPFA website](#)) and requiring them to take prompt improvement measures to address the following issues:

- Long tenure of independent non-executive directors (INEDs);
- Low digital take-up rate of MPF scheme members; and
- Room for further fee reduction.

All trustees submitted their responses and action plans. Regarding the fee issue of MPF schemes, MPFA required all trustees to submit a five-year fee reduction plan. In response, some trustees have planned to reduce fee for certain MPF funds. MPFA will continue to discuss with the trustees requiring them to regularly review their MPF fee levels with a view to continuing to drive down the fee for the benefits of scheme members.

MPF trustees are required to make available an annual governance report for each MPF scheme under their trusteeship. The governance reports provide a description of trustees' governance framework, their assessment and actions/changes in relation to value-for-money assessment, sustainable investing strategy and implementation progress, as well as other governance matters assessed by MPF trustees. The latest governance reports of all MPF schemes are posted on both the MPFA website and the websites of MPF trustees (or service providers) for easy access by MPF scheme members.

¹ The non-compliances concerned: (i) processing of MPF benefits transfer/payment; (ii) MPF scheme membership administration; (iii) provision of information to MPF scheme members; and (iv) statutory reporting to MPFA.

In July 2024, MPFA issued a circular to provide guidance to trustees to enhance their governance standards on (i) the tenure of their INEDs, (ii) the number of INEDs and (iii) the appointment of INED as the chair of the board. Trustees are required to take appropriate actions in response to the guidance.

In December 2024, a circular letter was issued to all MPF trustees to provide further guidance to enhance transparency of the governance framework of trustees, comprehensibility of governance reports of MPF schemes, as well as implementation and disclosure of sustainable investing strategies. In particular, a set of standardized templates on value-for-money (VFM) assessment results has been developed to enable MPF trustees to present the results of their assessments in a more structured and reader-friendly manner and to facilitate scheme members' understanding and like-to-like comparison of the VFM results of different MPF schemes in a transparent, standardized and at-a-glance manner. MPF trustees are required to implement the enhanced disclosure requirements in the preparation and compilation of the governance reports of MPF schemes for financial years ended on or after 30 November 2024.

Thematic Programmes

Post-onboarding Operations of Trustees

MPF trustees are obligated to fulfill their fiduciary duties and act in the best interests of scheme members. These responsibilities remain unchanged after the launch of eMPF and the onboarding of the respective MPF schemes. As of 31 March 2025, five trustees had onboarded to eMPF. MPFA has conducted ongoing monitoring to review and ensure the smooth post-onboarding operations of these trustees and their interface with eMPF.

On-site inspections were conducted at the offices of all five onboarded trustees to identify any issues or areas for improvement in their post-onboarding operations and communication with clients. Key observations from these inspections have also been shared with other trustees for their better preparation for the upcoming onboarding.

In addition, trustees are required to have in place effective plans, procedures and systems for enabling or facilitating the proper and efficient implementation of eMPF. For instance, MPFA has requested onboarded trustees to establish (i) a compliance plan to ensure the accuracy of data in the annual benefits statements issued by eMPF to scheme members, and (ii) an action plan to effectively communicate with their clients to drive the digital uptake rate of eMPF's operations.

Trustees' Onboarding to eMPF

According to the latest tentative onboarding schedule, the remaining seven trustees are expected to onboard eMPF by December 2025. MPFA continued to oversee the onboarding preparation of the remaining trustees. MPFA had conducted ongoing monitoring to oversee trustees' readiness for onboarding.

On-site inspections were carried out on all these remaining trustees between the third quarter of 2024 and the second quarter of 2025, and key observations were shared with trustees. In addition, MPFA issued written notices setting out the required actions to be taken by trustees to ensure their readiness for onboarding on the published dates.

Abolition of MPF Offsetting Arrangement

The abolition of MPF offsetting arrangement takes effect on 1 May 2025. In March 2025, MPFA reminded the MPF trustees to observe the updated legislative requirements, assess both operational and compliance implications and make adequate preparations to ensure a smooth transition and full adherence to new statutory requirements.

Promulgation of the Use of Artificial Intelligence (AI) and Responsible Use of Financial Technologies

MPFA continues to promote the responsible use of financial technologies. In November 2024, MPFA held a forum focused on the development and responsible use of AI and generative AI in the financial industry. During the forum, guest speakers also presented the potential benefits of AI and generative AI applications.



Prevention of Corruption in MPF Business

MPFA issued a circular to trustees in March 2025 to remind them of the importance of having in place robust internal controls to ensure full compliance with the Prevention of Bribery Ordinance when conducting their business. While trustees should establish a robust governance framework for the oversight and management of their MPF business and have in place a compliance plan to manage conflicts of interest according to the “Governance Principles for MPF Trustees” and the “Compliance Standards for MPF Approved Trustees”, they are also required to explicitly incorporate the essential probity requirements into their internal controls to strengthen the corruption prevention capabilities and uphold integrity.

Cross-Agency Collaboration on Green and Sustainable Finance

MPFA remains actively engaged in advancing green and sustainable finance. It has continued to participate in the Green and Sustainable Finance Cross-Agency Steering Group (Steering Group), co-chaired by the Hong Kong Monetary Authority (HKMA) and the Securities and Futures Commission (SFC). This collaboration focuses on examining policy and regulatory issues to further the development of green and sustainable finance in Hong Kong.



Meeting of the Green and Sustainable Finance Cross-Agency Steering Group

Among the major initiatives in 2024, the Steering Group supported the local adoption of the International Financial Reporting Standards (IFRS) Sustainability Disclosure Standards. In June 2024, MPFA arranged for the Hong Kong Institute of Certified Public Accountants (HKICPA) to meet with trustees for conducting a technical feasibility study on the application of IFRS Sustainability Disclosure Standards to help the industry better understand the disclosure requirements.



HKICPA's technical feasibility study meeting with MPFA, trustees and the Hong Kong Trustees' Association

In December 2024, the Government launched a roadmap for Hong Kong to adopt the IFRS Sustainability Disclosure Standards (Roadmap). Following the issuance of the Roadmap, HKICPA issued the Hong Kong Sustainability Disclosure Standards for aligning local sustainability disclosure standards with the IFRS Sustainability Disclosure Standards. MPFA continues to monitor local and international developments, including recommendations and guidance to be issued by international regulatory standard setting bodies, and the trustees' preparedness and capabilities, when considering future enhancements to relevant disclosure requirements.

MPFA keeps trustees abreast of developments in sustainable investing related standards. MPFA participated as an observer in an industry-led working group which was formed to develop a code of conduct for voluntary adoption (VCoC) by environmental, social and governance (ESG) ratings and data products providers providing products and services in Hong Kong. VCoC was published in October 2024, providing a streamlined and consistent basis for MPF trustees and their investment managers to conduct due diligence or ongoing assessment on ESG service providers.

In February 2025, the Steering Group set out three key priorities for 2025 to foster the growth of sustainable finance in Hong Kong. The three priorities are:

- Developing a comprehensive sustainability disclosure ecosystem;
- Reinforcing Hong Kong's role as a leading sustainable and transition finance hub; and
- Harnessing data and technology to facilitate sustainability reporting and promote sustainable financing activities.

Internship in Sustainable Finance

MPFA in 2024–25 continued to support the Steering Group's internship programme to create and promote local internship opportunities in green and sustainable finance for university students to gain practical work experience and general understanding of MPFA's policies in sustainable investing. Furthermore, MPFA encouraged trustees to provide relevant internship opportunities.

Facilitating MPF Industry Sustainability

MPF Trustees' Capacity Building

MPFA persists in promoting the industry's capacity building on sustainability reporting through working with the International Organisation of Pension Supervisors and industry engagement.

Green Operation

MPFA encourages the use of digital channels and paperless practices in MPF business. eMPF will facilitate digital management of MPF accounts and transactions, eliminating paperwork and reducing waste. Other e-platforms are available to minimize paper consumption. Some examples are as follows:

- **eORSO Portal:** This supports relevant parties of occupational retirement schemes (ORSO schemes) to electronically submit annual documents;
- **eApplication Submission Platform:** This enables electronic submission of MPF related applications, such as the approval of MPF funds;
- **Trustee eSubmission Portal:** This facilitates electronic submission of trustee's annual statements and accompanying documents; and
- **eCheque Collection Portal:** This allows stakeholders to make payments via eCheque, such as annual fee payment by MPF trustees and intermediaries, and ORSO periodic fee payment by employers.

MPF Symposium

On 24 February 2025, a symposium under the theme “Sustainability for MPF” was held to share with the MPF industry the latest trends and developments in sustainable investing. The symposium featured a panel discussion with speakers from MPF trustees, investment managers, and data providers, who examined the challenges the industry faced in integrating sustainability factors into their practices. The event was attended by around 400 participants in person and over 200 participants online.



A meet-the-media session was held before the symposium to update on MPFA's efforts in promoting sustainable investing and its regulatory initiatives to enhance the disclosure and reporting requirements for ESG funds

Communication with Trustees

MPFA maintains regular dialogues with trustees on MPF-related issues and works closely with them to pursue initiatives to enhance the MPF System. Activities during the year are as follows:

Communication Groups/Channels	Participants	Topics Covered	Number of Meetings Held
Chairman's meeting with trustees	Chairman and Managing Director of MPFA, Chairmen of trustees	<ul style="list-style-type: none"> eMPF project and MPFA's other upcoming initiatives involving trustees 	1
Roundtable discussion	Managing Director of MPFA and CEOs of trustees		1
Trustees Operations Liaison Group		<ul style="list-style-type: none"> MPF scheme operation 	1
Education Liaison Group		<ul style="list-style-type: none"> Publicity of the MPF System and MPF investment education 	Ongoing liaison
Industry Briefing	Representatives of MPFA and trustees	<ul style="list-style-type: none"> Enhancing disclosure of management fees of constituent funds (CFs) Enhancing disclosure made by trustees in annual governance reports of MPF schemes Supporting dealings of MPF funds on severe weather days 	4
Supervisory meetings	Representatives of MPFA and senior management of individual trustees	<ul style="list-style-type: none"> Assessment of trustees' preparatory work for onboarding eMPF, and provision of supervisory directives to trustees for resolving any issues identified Discussion on trustees' governance issues Assessment of investment performance and fee level of MPF schemes 	21
Sustainable investing disclosure	Representatives of MPFA, HKICPA, Hong Kong Trustees' Association and representatives of trustees	<ul style="list-style-type: none"> Technical feasibility study on adoption of international sustainability disclosure standards 	1
Frequently asked questions maintained on the MPFA website	MPFA and trustees	<ul style="list-style-type: none"> Common issues encountered by the MPF industry in the investment compliance monitoring process 	N/A



MPFA Chairman's meeting with trustees

MPF Schemes and Funds

Product Approval

MPFA issues guidelines relating to application for registration of MPF schemes, application for approval of funds and application for cancellation of approval of funds. Upon receipt of applications, MPFA conducts detailed reviews to ensure that the MPF legislation is complied with and that the interests of scheme members are protected.

- 3 CFs, 23 APIFs* and 28 ITCISs^ were approved;
- 13 CFs', 11 APIFs' and 4 ITCISs' approval status was cancelled;
- Registration of 1 scheme was cancelled; and
- 31 CFs reduced fees.

* approved pooled investment funds
^ index-tracking collective investment schemes

An eApplication Submission Platform is provided by MPFA to facilitate electronic submission of applications for approval of CFs by MPF trustees. Following the enhancement of the platform in 2024, MPFA will expand the scope of the platform to include APIFs and ITCISs, with development underway for rollout in the third quarter of 2025.

Promoting Sustainable Investing of MPF Funds

MPFA promotes sustainable investing by requiring MPF trustees to integrate ESG factors into the investment and risk management of MPF funds.

In the 2023–24 Budget, the Financial Secretary announced a plan to earmark a designated proportion of the future issuances of Government green bonds and infrastructure bonds for priority investment by MPF funds. To facilitate this, MPFA worked with HKMA for making the necessary arrangement, and consequently the priority allocation arrangement for Government green bonds has been put in place since June 2023. The same priority allocation arrangement will be adopted for Government infrastructure bonds upon their issuance.

ESG Product Development

In November 2022, MPFA issued a circular to give guidance to the industry on refined approval criteria for CFs, signalling to the market that the introduction of ESG-themed funds should enhance fund diversity to meet the needs of MPF scheme members with different investment outcome expectations. As of March 2025, MPFA approved five ESG-themed MPF funds, which incorporate ESG factors as their key investment focus and reflect such in the investment objective and/or strategy, for MPF scheme members. In February 2025, MPFA issued a circular to all MPF trustees providing guidance to enhance disclosure requirements for ESG-themed funds to facilitate scheme members' understanding of the ESG fund characteristics, associated risks, and how these funds achieve their ESG foci.

ESG Integration

Since 2022, MPF trustees have been required to disclose their ESG integration strategy and implementation progress in the schemes' annual governance reports. In December 2024, a circular letter was issued to all MPF trustees to provide further guidance on the implementation and disclosure of sustainable investing strategies. It requires them to step up efforts in raising MPF scheme members' awareness of ESG matters and facilitating their understanding of the information disclosed.

Default Investment Strategy

The Default Investment Strategy (DIS) is a highly standardized and fee-controlled MPF investment strategy designed to address the problems of high fees and difficulty in making investment choices for some scheme members. As at 31 March 2025, around 3.5 million MPF accounts (about 31.2% of the total number of 11.3 million MPF accounts) had their MPF partly or fully invested according to DIS or the two CFs of DIS, involving \$138.09 billion of MPF (over 10.3% of the total net asset value of the MPF System).

Since the passage of the legislation on DIS in May 2016 and up to 31 March 2025, 204 MPF funds have reduced their fees (biggest reduction up to 55%).

MPF Intermediaries

Registration

MPFA processes applications for registration as MPF intermediaries to engage in MPF sales and marketing activities. New applicants are required to take and pass a qualifying examination before they can become MPF intermediaries. Members of the public can check MPF intermediaries' registration through the public register on the [MPFA website](#) or hotline.

Supervision

MPFA communicates regularly with MPF intermediaries on regulatory requirements and legislative changes relevant to them. In 2024–25, seven circulars were issued in relation to regulatory issues and protection of scheme members, covering conduct issues, regulation on offering of rebates, gifts and incentives by MPF intermediaries, handling early withdrawal of MPF benefits due to permanent departure from Hong Kong, cessation of unsolicited calls for marketing MPF-related products or services and prevention of corruption in MPF business.

Following the ongoing supervisory initiatives by MPFA and strengthened internal control and compliance efforts by MPF intermediaries, MPF intermediaries have ceased conducting unsolicited calls for marketing MPF-related products or services since February 2025 in response to growing concern over potential scam calls purportedly related to MPF. Moreover, they were requested to adopt appropriate measures to ensure unsolicited telemarketing activities are not conducted anymore. MPF intermediaries should comply with the conduct requirements in the sales and marketing of MPF-related products or services. In case of violations, disciplinary actions will be taken against the MPF intermediaries concerned.

MPF intermediaries are required to submit annual returns² to MPFA within one month after the end of a calendar year. An eService system is provided by MPFA for MPF intermediaries to submit annual returns, view their registration details, pay annual fees, notify information changes, and receive statutory notifications and circulars.

As the frontline regulators (FRs), namely Monetary Authority (MA), the Insurance Authority (IA) and SFC, have been given the statutory role to supervise and investigate MPF intermediaries whose core business is in the banking, insurance and securities sectors respectively, the MPF Intermediaries Regulation Committee comprising representatives from MPFA and FRs has been formed to share views and observations from the supervisory experiences of MPF intermediaries to ensure regulatory consistency.

Training

Subsidiary intermediaries must complete a minimum number of Continuing Professional Development (CPD) hours on MPF each year to maintain professional competencies. Effective from 1 January 2024, the minimum required CPD hours have increased from 10 to 15 (with the minimum number of core CPD hours increased from two to four) each year. Non-compliance may result in suspension or revocation of registration.

Core CPD training for MPF intermediaries is offered by industry associations and training institutions. MPFA conducts quality assurance checks on these core CPD activities to confirm their standard. In 2024–25, a total of 20 core CPD training activities were delivered by MPFA's representative at CPD training institutions' invitation, and 26 train-the-trainers workshops and industry briefings were organized by MPFA. The course outline of a new core CPD training course provided by MPFA from April 2025 will cover the cessation of unsolicited telemarketing activities by MPF intermediaries and recent development of the MPF System.

2 Principal intermediaries' annual returns cover business statistics on MPF sales and marketing activities conducted during the year of reporting. Subsidiary intermediaries' annual returns cover the number of hours of core and non-core Continuing Professional Development activities on MPF they attended during the year under report.

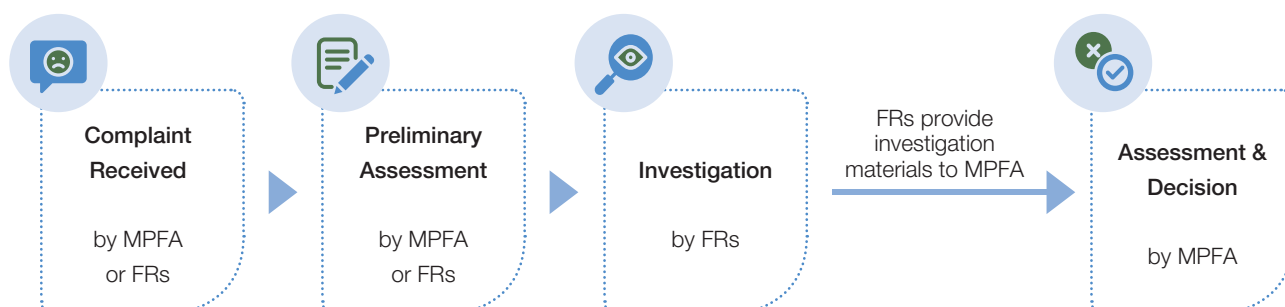
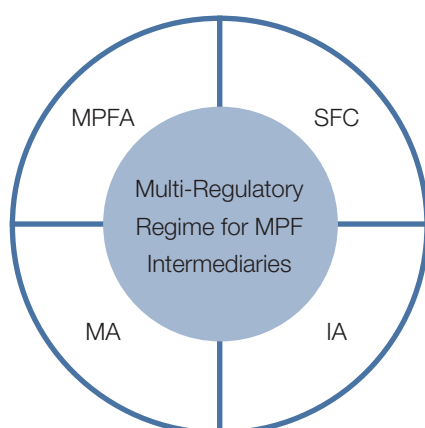
To ensure MPF intermediaries have the knowledge to assist employers and scheme members to use eMPF, training will continue to be arranged for the intermediaries in 2025–26.



Enforcement

Multi-Regulatory Regime

MPFA adopts a multi-regulatory regime for the regulation of MPF intermediaries under which FRs are responsible for the day-to-day supervision and investigation into complaints against MPF intermediaries who are also their regulatees.



MPFA is the sole authority to register MPF intermediaries, provide compliance guidelines, and take disciplinary actions against non-compliant MPF intermediaries. When FRs complete investigation of suspected misconduct of MPF intermediaries, they will pass the investigation findings to MPFA for assessment and decision on taking any disciplinary actions as appropriate.

Enforcement Actions

During the year, MPFA received 20 complaints and referral cases mainly concerning suspected misconduct of MPF intermediaries for non-compliance with the statutory conduct requirements. A total of six compliance advice letters were issued to principal or subsidiary intermediaries in five cases. Disciplinary orders were imposed on one principal intermediary, two responsible officers and four subsidiary intermediaries for breaching the statutory conduct requirements and the Conduct Guidelines (details are available on the [MPFA website](#)). The principal intermediary was publicly reprimanded and fined \$24 million. The two responsible officers were publicly reprimanded and disqualified from being approved as a responsible officer of a principal intermediary for 18 and 30 months respectively. The four subsidiary intermediaries were publicly reprimanded and disqualified from being registered as an intermediary for two, 12, 46 and 60 months respectively. Meanwhile, FRs conducted nine on-site inspections on MPF intermediaries.

Enforcement Actions against Intermediaries

2024–25	
By MPFA	
Complaints and FRs' referral cases received	20
Compliance advice letters issued	6
Disciplinary orders imposed	7
By FRs	
On-site inspections conducted	9
Investigation cases initiated	1

Liaison with FRs

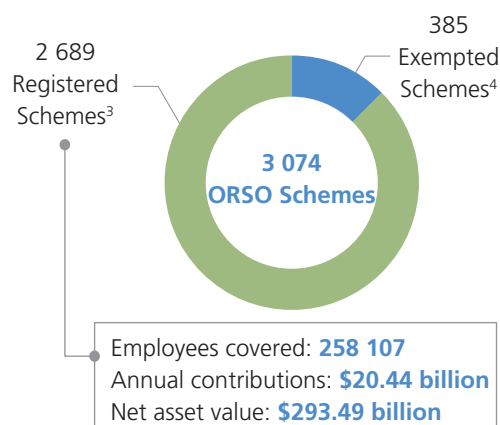
In maintaining close communication, MPFA holds liaison meetings with FRs regularly. During 2024–25, two MPF Intermediaries Regulation Committee meetings were held with FRs for sharing matters of regulatory nature and experience under the respective regimes.

MPFA further held two meetings with IA for updates of case progress, including cases referred by MPFA to IA and those received by IA. During the meetings, MPFA and IA had constructive discussions on tackling different regulatory issues and enhancing case handling.

ORSO Schemes

ORSO schemes and MPF schemes are both retirement protection schemes set up for employees in Hong Kong, but their operations are different (details are available on the [MPFA website](#)). Since the launch of the MPF System, MPFA has exempted a number of ORSO schemes that meet certain criteria from following MPF regulations.

Key Figures on ORSO Schemes (31.3.2025)



Work of Registrar of ORSO Schemes

MPFA assumes the role of the Registrar of ORSO schemes. Work in this area includes the following:

- Processing various changes and applications in relation to ORSO schemes;
- Investigating suspected non-compliance cases of exempted schemes and registered schemes;
- Taking supervisory actions to ensure the implementation of remediation and enhancements by employers, administrators and/or trustees to meet regulatory requirements; and
- Liaising with professional and industry bodies to promote compliance and awareness of ORSO regulatory requirements.

Key Activities of the Registrar

During the year, the Registrar has achieved the following:

Approved

- 10 applications for registration of ORSO schemes;
- MPF exemption⁵ in respect of three ORSO registered schemes;

³ An ORSO registered scheme refers to one registered under section 18 of ORSO.

⁴ An ORSO exempted scheme refers to one in respect of which an exemption certificate has been issued under section 7 of ORSO and any withdrawal under section 12 of ORSO has not come into effect; or an ORSO scheme within the meaning of ORSO where the employer of the scheme is the government of a place outside Hong Kong or an agency or undertaking of or by such a government which is not operated for the purpose of gain.

⁵ MPF exemption refers to an exemption under section 5 of MPFSO. Members, or a class of members, of an MPF exempted ORSO scheme and their employer are exempt from the operation of all or any specified provisions of MPFSO. This is an interface arrangement with the MPF System when the System was launched in 2000.

- withdrawal of MPF exemption in respect of 131 ORSO registered schemes and eight ORSO exempted schemes; and
- 53 applications for change of trustees for MPF exempted ORSO registered schemes.

Processed

- 466 notifications of changes in relation to name, administrator, employer and address of ORSO schemes;
- 2 936 annual returns and financial statements of ORSO registered schemes and 370 annual returns of ORSO exempted schemes;
- Seven overseas compliance certificates and 296 membership statements of ORSO exempted schemes;
- annual written statements on ongoing compliance with employment based criterion of 2 596 ORSO registered schemes and 344 ORSO exempted schemes;
- notices of termination given by 157 ORSO registered schemes and 24 ORSO exempted schemes; and
- review of internal control procedures for compliance with statutory requirements of an ORSO administrator through on-site inspection.

Granted Consent to

- Four ORSO registered scheme for cessation of application of pooling agreements to the scheme; and
- 86 applications for consent to disclose information in compliance with the Foreign Account Tax Compliance Act of the United States.

Funding Status of ORSO Registered Schemes

MPFA monitors the funding status of ORSO registered schemes by examining their annual returns and audited financial statements. For defined benefit schemes⁶, actuarial certificates must be supplied by designated persons at least once every three years.

According to the relevant reports received up to 31 March 2025, 11 (about 7.3%) out of 151 defined benefit ORSO schemes were under-funded, covering around 402 scheme members. The total asset size of these under-funded schemes amounted to \$681 million. The total shortfall of these under-funded schemes was \$141 million (about 20.7% of their total assets). The shortfall was caused by investment returns being below expectations and/or salary increase higher than the assumption used by actuaries.

The relevant employers have to make up the shortfall in funding by a lump sum contribution or monthly contributions within three years and submit actuarial certificates annually until the schemes are fully funded. MPFA closely monitors the situation that these additional contributions are being made by the relevant employers to address the funding shortfall.

Relinquishing of MPF Exemption Status of ORSO Schemes

In 2024–25, 139 MPF exempted ORSO schemes covering 700 members of ORSO registered schemes relinquished their exemption status. The employers subsequently terminated these schemes and enrolled the employees into MPF schemes or other MPF exempted ORSO schemes.

Abolition of MPF Offsetting Arrangement for MPF-Exempted ORSO Registered Schemes

The abolition of MPF offsetting arrangement, which takes effect on 1 May 2025, is applicable to MPF-exempted ORSO registered schemes. In March 2025, MPFA reminded the administrators of all ORSO registered schemes to observe the updated legislative requirements. They were reminded to assess both operational and compliance implications and to implement the necessary measures to ensure a smooth transition and full compliance with the new statutory obligations.

⁶ Defined benefit schemes are schemes under which the retirement benefits of scheme members are determined by taking into account the members' years of service and final salary.