



BANK OF GHANA

**EXPLANATORY NOTES TO THE
BANCASSURANCE DIRECTIVE**

*FOR BANKS AND SPECIALISED DEPOSIT-TAKING
INSTITUTIONS*

September 2025



TABLE OF CONTENTS

Introduction	1
Notes explaining revisions reflected in the Bancassurance Directive, 2025	2

PUBLIC



INTRODUCTION

Pursuant to sections 18 and 92 of the Banks and Specialised Deposit-Taking Institutions Act, 2016 (Act 930); the Bank of Ghana (BOG) has issued the Bank of Ghana Bancassurance Directive, 2025, following the consultations with the banking industry, (herein called “the industry”) as well as other stakeholder engagements with the National Insurance Commission (NIC), and the Ghana Association of Banks (GAB).

The purpose of this directive is to provide BOG’s regulatory expectations in respect of the approved model, governance and risk management, prohibited activities and consumer protection requirements to the banking industry to ensure that inherent risks associated with the product are adequately managed by RFIs, as well as to smooth further and ensure a seamless implementation of the business of Bancassurance in Ghana between the banking and insurance sectors of the economy.

The adopted Distribution Partnership model permits an RFI to contract with one life and one general insurance company and allows individual customers to choose their desired product and insurer. This arrangement benefits both the insurer and the RFI, as it enables the insurer to reach a broader consumer base and allows the RFI to diversify its product portfolio. The model ensures that there is no sharing of risk between the RFI and the insurer.

The development of the Bancassurance Directive has seen a significant boost following comments, suggestions, and contributions received during the Bank’s internal and public consultations. This has resulted in a revised Bancassurance Directive dated September 2025, which seeks to, among others, incorporate material contributions received from the consultations based on the Bancassurance Directive Exposure Draft.

As such, this explanatory note seeks to clarify the material changes made to the Exposure Draft.



NOTES EXPLAINING REVISIONS REFLECTED IN THE BANCASSURANCE DIRECTIVE, 2025

PART I – PRELIMINARY PROVISIONS

Interpretation

The following terms were used in the Exposure Draft Directive but were not clearly defined. They have subsequently been defined to provide clarity, as follows:

“Fit and Proper Person”: means a person who is suitable to hold the particular position which that person holds or is to hold as regards to:

- a.* the probity, competence and soundness of judgment of the person for purposes of fulfilling the responsibilities of that person;
- b.* the diligence with which that person fulfils or is likely to fulfil those responsibilities;
- c.* whether the interest of depositors or potential depositors of the entity are threatened, or likely to be, in any way threatened by the person holding that position; and
- d.* that the integrity of the person is established and the qualifications and experience of the person are appropriate for the position in the light of the business plan and activities of the entity which the person serves, or is likely to serve, taking into account the size, nature and complexity of the institution.

“Key Management Personnel” means the chief executive officer or managing director, deputy chief executive officer, chief operating officer, chief finance officer, Board secretary, treasurer, chief internal auditor, the chief risk officer, the head of compliance, the anti-money laundering reporting officer, the head of internal control functions, the chief legal officer, the manager of a significant business unit of the Regulated Financial Institution.

PART III – PRELIMINARY PROVISIONS

Prohibited Activities

Paragraph 29 has been added to the prohibited activities:

“An RFI shall not make the purchase of an insurance product a mandatory condition for accessing any banking service, including but not limited to loans, deposits, or account opening”.

This is to ensure that RFIs do not coerce their customers into subscribing to any Bancassurance product.



PART IV – APPLICATION PROCESS

Supporting Documents

Insertion of two additional requirements to paragraph 32 as follows:

- a.* Data Protection and Confidentiality obligations of the parties.
- b.* Compliance with AML/CFT laws.

These are designed to enhance compliance with data protection and AML/CTF regulatory requirements.

September 2025

PUBLIC