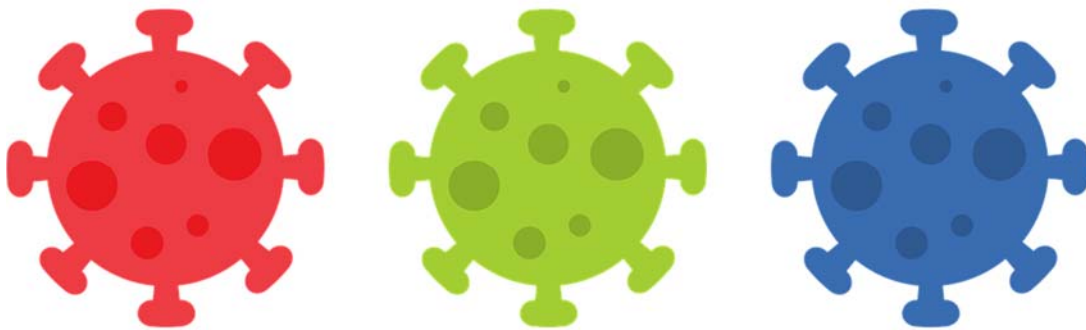




**GOVERNMENT OF BERMUDA'S
RESPONSE TO COVID-19:**

THE UNEMPLOYMENT BENEFIT ADMINISTRATION



PUBLIC INTEREST REPORT

OCTOBER 2021



Office of the Auditor General

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The Honourable Dennis P. Lister, JP, MP
Speaker of the House of Assembly
Sessions House
21 Parliament Street
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Honourable Speaker:

Pursuant to Section 13 of the Audit Act 1990, I have the honour to submit herewith my second Public Interest Report on a programme of work undertaken on the Government of Bermuda's Unemployment Benefit Initiative.

Respectfully submitted

Heather Thomas, CPA, CFE, CGMA
Auditor General

Hamilton, Bermuda
October 2021

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The Office of the Auditor General of Bermuda was established by statute as an independent entity. Its roles and responsibilities include undertaking audits on behalf of Parliament to determine whether the operations or activities of the Government and its agencies are being performed effectively, economically, efficiently and in compliance with relevant laws and regulations.

This is the second public interest report that the Office of the Auditor General has undertaken to support Parliament in its scrutiny of the Government of Bermuda (the ‘Government’) response to the coronavirus (COVID-19) pandemic. This report is a factual summary of the Government’s activities related to the benefits provided to persons who became unemployed as a result of COVID-19, the *Unemployment Benefit* (“UEB” or “benefit”). The information in this report has not been audited, and does not assess the value for money aspect of the Government’s response. As the COVID-19 landscape continues to unfold and the Government response continues, a phased reporting approach was adopted so as not to compromise the Government’s on-going emergency responses.

We undertook this work not only because of queries from the Public, but also because we recognise the importance of independent reporting to Parliament and the Public. We will continue to monitor and report on the Government’s COVID-19 response in order to provide independent reporting to the Public and Parliament about how the Government is accounting for its COVID-19 initiatives and results achieved.

Government of Bermuda’s Response to COVID-19 – The Unemployment Benefit Administration

SECTION 1: BACKGROUND

Since early 2020, the coronavirus disease, or *COVID-19*, has spread throughout the world impacting the daily lives of countless individuals. The World Health Organization declared COVID-19 a global pandemic on March 11, 2020.

To October 1, 2021, Bermuda has seen multiple confirmed cases of COVID-19:

Bermuda		World	
Total Cases	Deaths	Total Cases	Deaths
5,336	75	233,633,606	4,788,419

Table 1: Cases and deaths to October 1, 2021¹

For additional information on the disease and its effect on Bermuda, please refer to our previous public interest report *Government of Bermuda’s Response to COVID-19*, available on our website at www.oagbermuda.bm. Refer to *Appendix A* of this report for an update on the cost figures presented in that previous report.

On March 17, 2020, Cabinet approved the introduction of an unemployment benefit (the “UEB” or “benefit”) based on a policy put in place by the Ministry of Labour, Community Affairs and Sport (“MLCAS”). The introduction of the UEB programme coincided with the Government’s efforts to limit the spread of COVID-19, which included several closures and restrictions on movement – closure of schools, public pools, salons, spas, barbers, churches, organised sports and concerts, and the closure of the L.F. Wade International Airport. Later in March, closures were expanded to include retail stores, cinemas, eateries, with only essential businesses being permitted to open. Work from home and a nightly curfew became mandatory after Your Excellency the Governor declared a state of emergency on April 1, 2020. These closures resulted in a significant number of Bermudians and residents of Bermuda without a source of income.

As announced on March 18, 2020, the Government created a task force to implement the UEB – the programme to be administered through the Department of Workforce Development.² This included development and maintenance of a database system by a third party known as the Unemployment Benefits Administration, or “UBA,” to track the life cycle of UEB applications. This was not an open tender contract. Applications were accepted beginning March 25, 2020 with the first benefit payments being made on April 2, 2020.



Figure 1: Initial timeline for UEB development

¹ For world information, WHO – COVID-19 dashboard <https://covid19.who.int/>; for Bermuda information, <https://www.gov.bm/coronavirus-covid19-update>

² <https://www.gov.bm/articles/covid-19-unemployment-benefit>

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SECTION 2: ABOUT THIS EXAMINATION

Pursuant to the Audit Act 1990, sections 12(1) and 12(2) (a) and (b), the Auditor General may, in the public interest, undertake works and review any matter of public interest. This report presents a factual summary of the Government's actions as they relate to Government's support of individuals who became unemployed as a result of COVID-19 restrictions; highlights the steps taken by Office of the Auditor General (OAG) in reviewing the administration of the unemployment benefit; and documents the results of OAG's test of payments made to individuals who applied for unemployment benefit.

Similar to the first public interest report presented as part of this programme of work, the information in this report does not assess the value for money of the Government response or the effectiveness of such response. As part of our work, OAG held interviews with various Government stakeholders (both internal and external to Government) and reviewed the applicable legislation and related regulations/amendments to support the findings and observations presented in this report.

COVID-19 has had a significant impact on Bermuda and globally, in areas such as public health, employment, and economic activities. The pandemic required urgent actions by governments whilst balancing accountability and transparency relative to the action taken.

SECTION 3: GUIDING LEGISLATION AND GOVERNANCE

On March 24, 2020, the Minister of Finance enacted the *Public Treasury (Administration and Payments) (Temporary Unemployment Benefit) Regulations 2020* (the "Regulations"). Per section 3(1) and 3(2) of the Regulations, the UEB is a temporary benefit approved for payment, from the Unemployment Insurance Fund, to eligible individuals whose employment was adversely affected as a result of COVID-19, for a maximum period of twelve weeks³ beginning from the date when his or her application for the benefit is approved. Two amendments to the Regulations were subsequently passed which effectively extended the maximum period for the benefit from the initial twelve weeks to eighteen weeks.

The UEB was intended for eligible individuals who were **not** collecting Financial Assistance from the Government.⁴ Section 4 (2) and (3) of the Regulations outlines whether or not an individual is qualified to apply for the benefit depending on whether or not the individual's employment (or self-employment) was directly impacted by COVID-19:

³ *Public Treasury (Administration and Payments) (Temporary Unemployment Benefit) Regulations 2020*

⁴ Department of Financial Assistance assesses Bermudians who may be in need of a financial award to meet a minimum standard of living

Government of Bermuda’s Response to COVID-19 – The Unemployment Benefit Administration

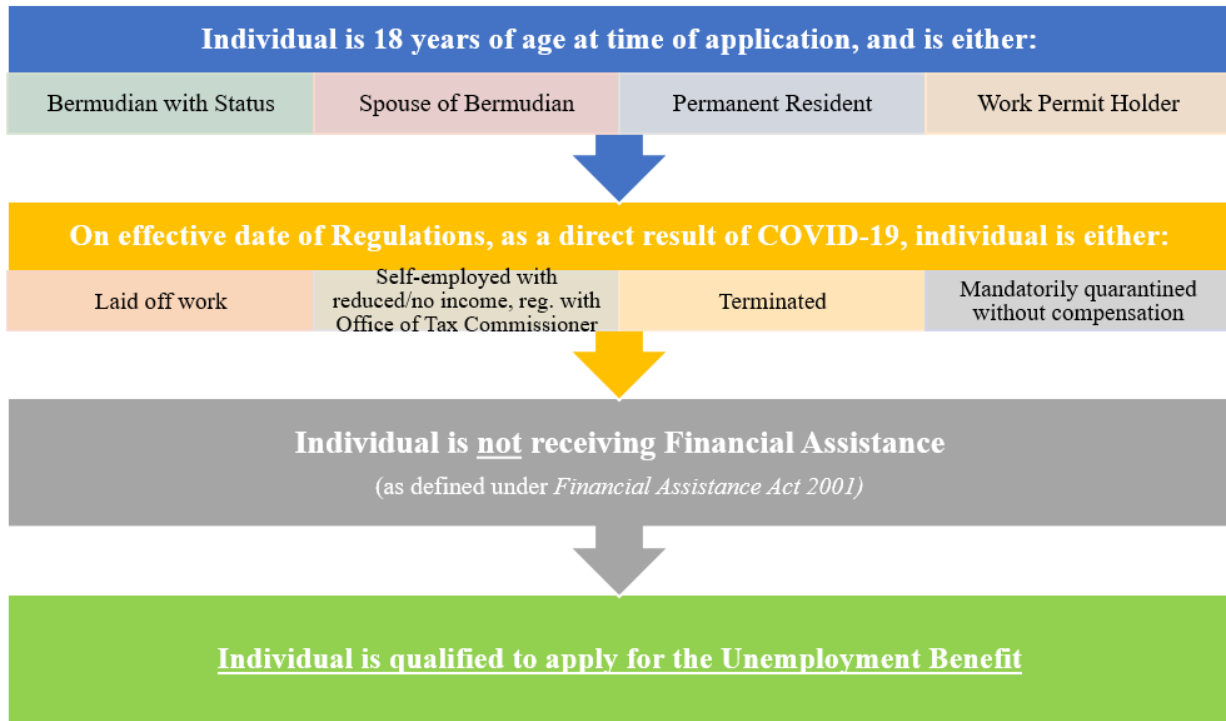


Figure 2: Qualifications for application per Regulations, Section 4

Work permit holders, as outlined in *Figure 2*, were only qualified to apply for the temporary unemployment benefit if the permit holder’s employment was terminated *and* departure from Bermuda was prevented due to travel restrictions directly related to COVID-19. Once an individual met the requirements outlined above and was qualified to apply for UEB, the Regulations required that the applicant was residing in Bermuda when the Regulations came into effect. Section 6 of the Regulations prescribes the maximum amount of the weekly benefit payment:

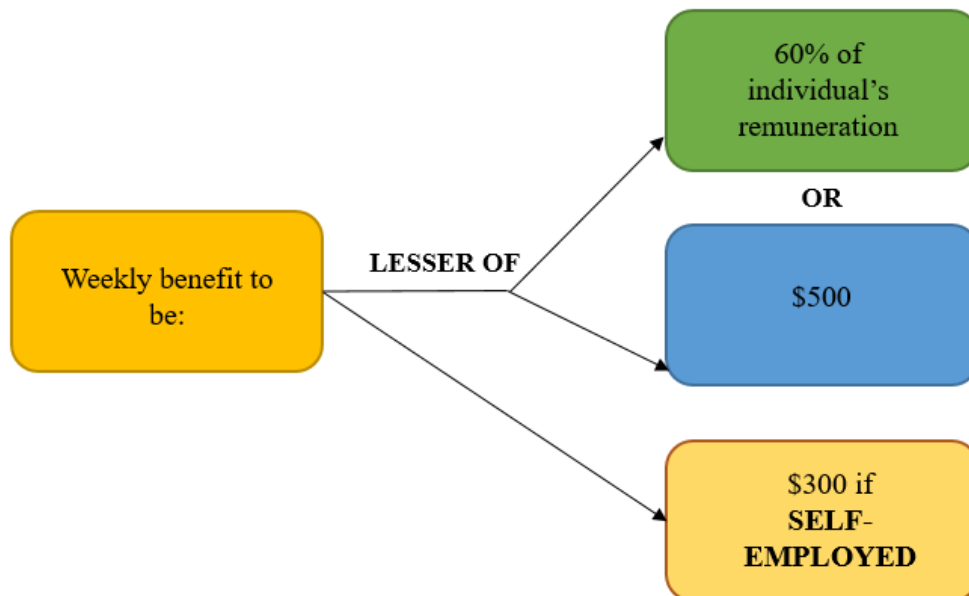


Figure 3: Maximum amount of weekly benefit payment

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Other aspects of the Regulations, such as the required processes for applying for and approval of the benefit, are further discussed throughout this report.

SECTION 4: REQUIRED APPLICATION AND APPROVAL PROCESSES

Sections 7 and 8 of the Regulations specify the required application and approval process that is to be followed by persons applying for the UEB. Notwithstanding the requirements set out in Section 7 and 8, Section 5 of the Regulations allows the Minister of Finance to exercise his ministerial functions under the *Public Treasury (Administration and Payments) Act 1969*, which states:

- the Minister of Finance may direct sums to be paid to an individual for unemployment benefit in consultation with the Minister and Director responsible for Workforce Development;
- the Minister of Finance may authorise an officer of his Ministry or department to exercise his powers and shall furnish such officer with an authorisation signed by him; and
- an officer exercising powers by virtue of an authority under this regulation shall produce evidence of his authorisation if required.

Applications for the UEB were largely submitted by the applicant, however, employers also submitted applications in batches on behalf of their employees. Applications were submitted in hard copy or online through the *Bermuda Job Board* website⁵ with the UBA database serving as the central repository for all applicant information irrespective of format by which the information had been received.

Section 7(4) of the Regulations specifies that persons applying for the UEB must submit to the Director of the Department of Workforce Development the following:

- evidence that the applicant is either Bermudian, married to a Bermudian, a Permanent Resident, or has a valid work permit;
- a letter from the applicant's employer (or former employer) confirming most recent employment status and most recent remuneration⁶;
- a copy of photographic identification (i.e. driver's license, passport, or other Government-issued identification);
- if self-employed, evidence of payroll tax returns for the last two quarters; and
- evidence from a medical practitioner or other confirmation should the applicant be in quarantine with no compensation.

⁵ Website: <http://bermudajobboard.bm>

⁶ Verification of employment was to be performed by the applicant's employer – this was done via an email routed from the UBA to the employer based on the information provided by the applicant.

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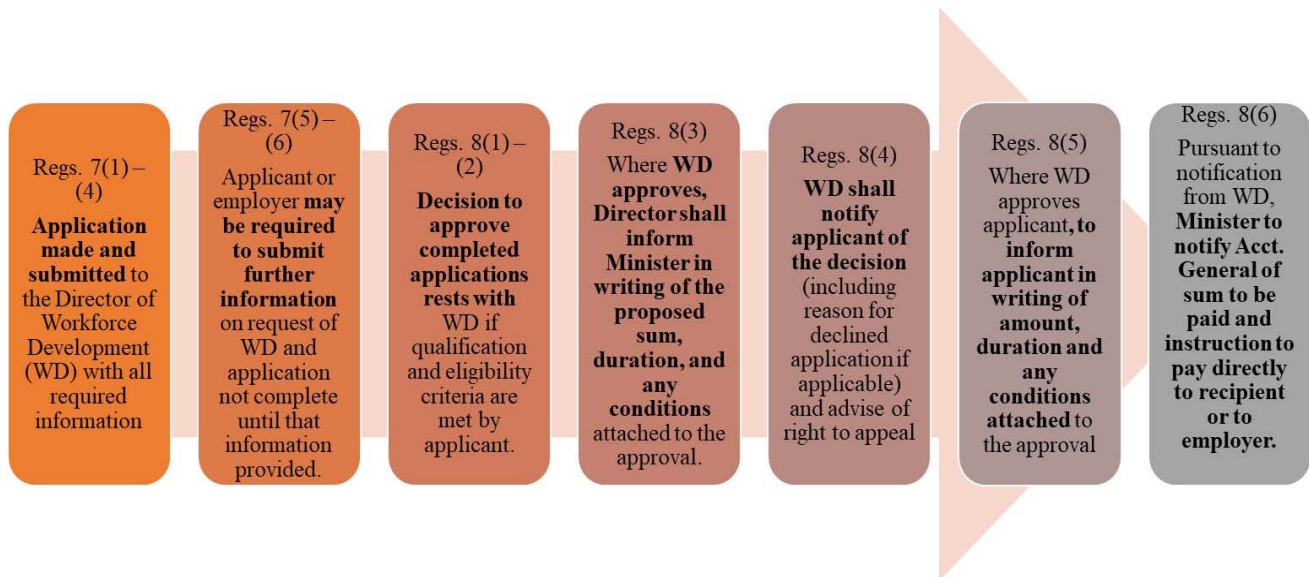


Figure 4: Required application and approval processes as defined in Regulations

As noted in Figure 4, the decision to approve completed applications rests with the Director of Workforce Development, notwithstanding Section 5 of the *Public Treasury (Administration and Payments) Act 1969*, which gives the Minister of Finance powers of authorisation.

Our review of the UBA data revealed that the database was designed with specific fields to accommodate the uploading of documents required to support the application, submission, and approval process. However, several control weaknesses were identified; these control weaknesses were highlighted in an internal review of the UEB prepared by PricewaterhouseCoopers (PwC). However, due to the urgent need to provide relief to persons suffering economic hardship as a result of COVID-19, the Ministry of Finance accepted the risk and made the decision to commence processing, approval and payment of the UEB to those in need despite the internal control weaknesses noted with respect to the design and configuration of the UBA database.

SECTION 5: PAYOUT OF SUMS & RETROACTIVE REVIEW

In our interviews with various departments, interviewees indicated that there was a ‘blanket’ approval provided by the Minister of Finance in order to expedite payments to those individuals without a source of income as a result of COVID-19. Despite multiple requests, formal evidence of this approval was not provided—it was not until August 2021 during the performance of the financial statement audit of the *Unemployment Insurance Fund* for the year ended March 31, 2020, that we saw documentation of the Minister of Finance’s blanket approval in an effort to expedite payment of the UEB to applicants.

On April 2, 2020, in a memorandum to the Accountant General, the Minister of Finance approved funding of up to \$4,000,000 from the Unemployment Insurance Fund to be used to fund the payment of the unemployment benefit. The Minister of Finance noted that “...[he was] aware that the full validation process [had] not been finalized and hereby direct[ed] that these payments be made considering the hardship cause [sic] by COVID-19 and the state of emergency declared by the Governor on April 1st 2020.”⁷

⁷ Memorandum dated April 2, 2020, subject “Approval of Funds from the Unemployment Insurance
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The Minister of Finance further stated that these UEB applications were to be retroactively validated and any errors uncovered rectified. A further six memorandums, signed by the Financial Secretary (who had been delegated that authority) directed additional payments to be made as the UEB was extended beyond the original twelve weeks and additional funding was required to fund the programme. These memoranda all included reference to the retroactive validation of applications and rectification of any errors uncovered. It should be noted however, that at the time, this retroactive validation would not have been feasible due to limitations within the legislation.

The Department of Workforce Development encountered challenges in validating Government information with the Office of the Tax Commissioner, Department of Immigration and Department of Social Insurance and were locked out of the UEB database by the Ministry of Finance from roughly April 2020 until April 2021 and were unable to process or approve any applications. Payments were knowingly made with no prior approvals, resulting in numerous UEB applications processed not in compliant with the legislation.

In April 2021, the Department of Workforce Development began planning for a review and clean-up project for the UEB programme. A small team, headed by a Project Lead, was assigned and working to complete this project. In many cases, activities by the team involved follow-ups with either the applicant or the applicant’s employer, to obtain the appropriate documentation or explanation(s) required to retroactively support the application. The intention of the project also required the team to liaise with other Government departments as may be necessary, to confirm the eligibility of persons who had received UEB payments. The approach sought primarily to provide answers to three questions:

1. Was the individual eligible to receive the UEB as defined in the Regulations?
2. What amount should the benefit payment have been?
3. How long should the individual have received the payments?

The Department of Workforce Development has since confirmed that the review and clean-up project was discontinued as of July 28, 2021. As of the release of this report, the Office of the Auditor General has not had line of sight to the final scope of the review or the results generated to date.

The *Public Treasury (Administration and Payments) Amendment and Validation Act 2021* was passed on August 2, 2021. This allowed the Government to recover any incorrect payments made to individuals who received the benefit.

SECTION 6: OAG’S REVIEW OF THE UBA DATA AND PAYMENTS

As a result of the ‘blanket’ approval that had been given by the Minister of Finance resulting in the expediting of payments (as discussed in Section 5), OAG’s review of the UBA data began with the understanding that the data might not be complete, accurate or reliable. It was also understood that a significant percentage of the applications submitted may not have been properly reviewed prior to the processing of payment which could have resulted in some persons who were not eligible to receive payment receiving such payment, or persons receiving incorrect payment amounts.

With unrestricted access to the database and the information contained therein, we executed the following tests:

- A “general” test involving the entire population of individuals who had received UEB payments—randomly selected for detailed testing to determine whether these individuals submitted the required documentation to conclude on their eligibility and reasonableness of amount paid.

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- A “targeted” test involving the entire population of individuals who had received UEB payments—selected on a pre-determined set of characteristics to determine whether these individuals submitted the required documentation to conclude on their eligibility and reasonableness of amount paid.

In both the targeted and general testing, we first tested compliance with the eligibility requirements outlined in the legislation (see above in Section 4 of this report).

We also tested whether individuals receiving Financial Assistance from the Government had also received the UEB (see below under *Financial Assistance Analysis*). Finally, we tested a sample of those who had applied for, but who had not received any payment in order to determine whether there were applicants who may have been qualified to receive the benefit but who had not been paid (see below under *Applied but Not Paid*).

General Testing

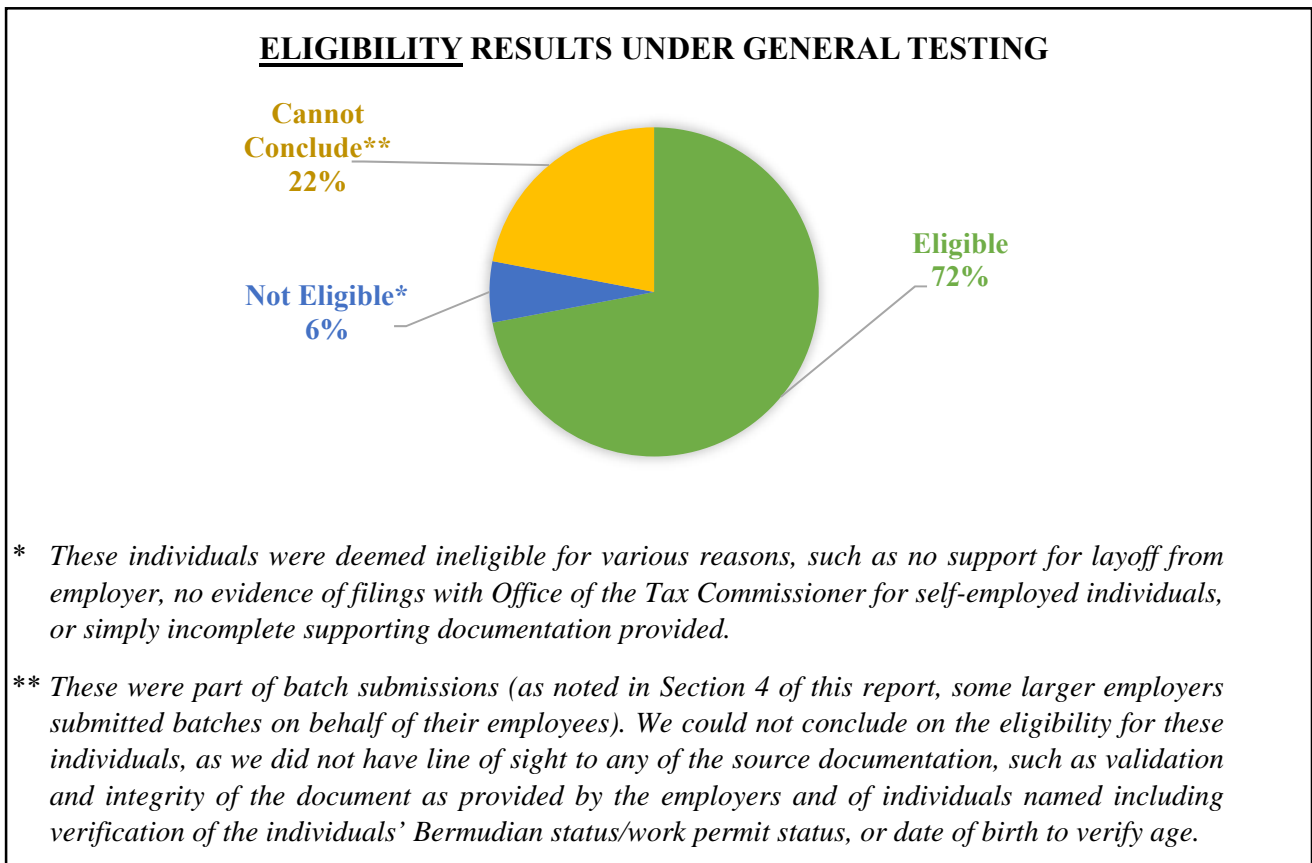


Figure 5: Results of eligibility test on 100 randomly selected samples from population of paid individuals

To test whether the amounts paid to individual applicants were in accordance with the payment amounts set out in legislation, we executed test procedures to confirm that the weekly benefit payment made to individual applicants did not exceed the lesser of \$500 and 60% of the individual’s weekly pay (or \$300 for those self-employed). Of the total number of applicants, approximately 14% were self-employed. For the full 18 (eighteen) weeks of the benefit, the total payment to any applicant should not have exceeded \$9,000 (or \$5,400 for those self-employed). In executing our test procedures we:

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- tied individual applicant’s weekly payment amount received to source documents on file (employer letter, sample pay stubs, etc.),
- recalculated the weekly earnings at sixty percent (60%) to determine what the maximum weekly payment should have been and to ascertain the maximum total amount that each applicant received for the duration of the benefit programme, and
- verified the total amount paid to each applicant via the Government’s accounting system (JD Edwards EnterpriseOne) to determine whether any applicant had been paid more than they should have per the legislation.

Our testing did not consider whether payments should have been reduced for any of the benefit recipients who may have returned to work before the end of the benefit period, as we did not have line of sight to this information. As such, we considered the “maximum” to be the calculated amount at the full eighteen (18) weeks when looking for overpayments.

Our testing also did not consider individuals’ residency at the time of application beyond what was recorded in the database or supporting documentation (such as passports, driving licenses or work permits). As per the Regulations, all applicants were required to be resident in Bermuda at the time of application. We did not liaise with the Department of Immigration to verify that all applicants were residing in Bermuda at the time that they applied for the UEB.

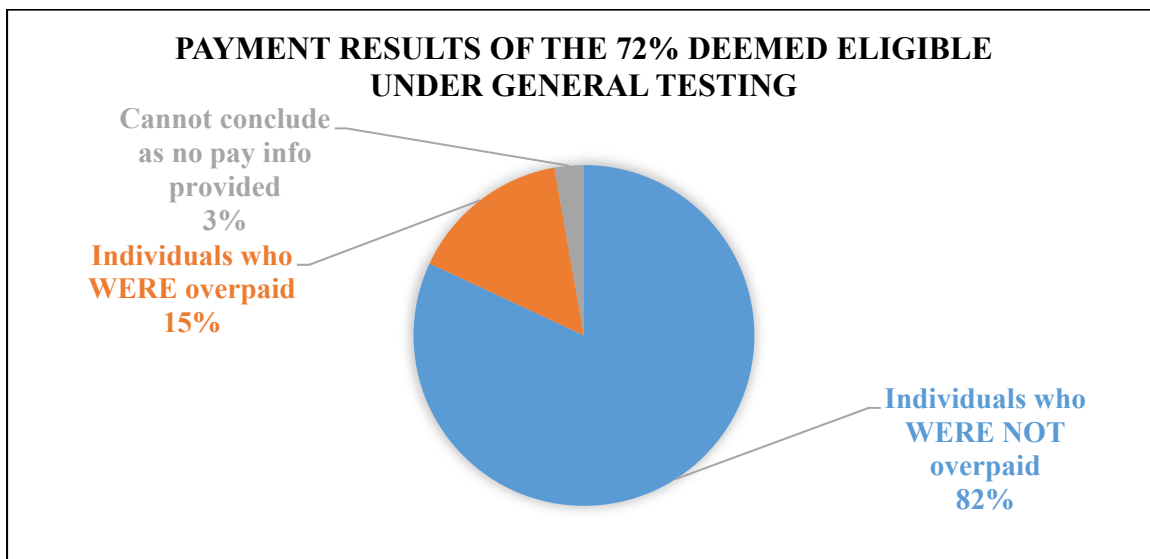


Figure 6: Results of payment test on those eligible from randomly selected samples from population of paid individuals

We consider all of those individuals deemed ineligible (in *Figure 5*) and overpaid as they did not qualify for the benefit but did receive UEB payments.

With respect to the twenty-two percent (22%) of applicants who received the UEB payment but whose eligibility could not be verified as the employer had submitted batch applications via spreadsheets on their behalf without attaching the required supporting documentation (in *Figure 5*), our analysis indicated that:

- Two percent (2%) *appear* to have been overpaid based on our recalculation
- Twenty percent (20%) *appear* to have been paid correctly based on our recalculation

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Targeted Testing

For the targeted testing, we used data analytics to consolidate a population that met certain characteristics, which we determined to be indicators that the applicants could be ineligible for the benefit. We looked at characteristics such as:

- Incorrect or blank social insurance numbers or work permit numbers
- Unusual or blank names
- Ages under 18 years or significantly past the retirement age

These characteristics were selected using our professional judgment based on an examination of the population of applicants who had applied for and were paid the benefit.

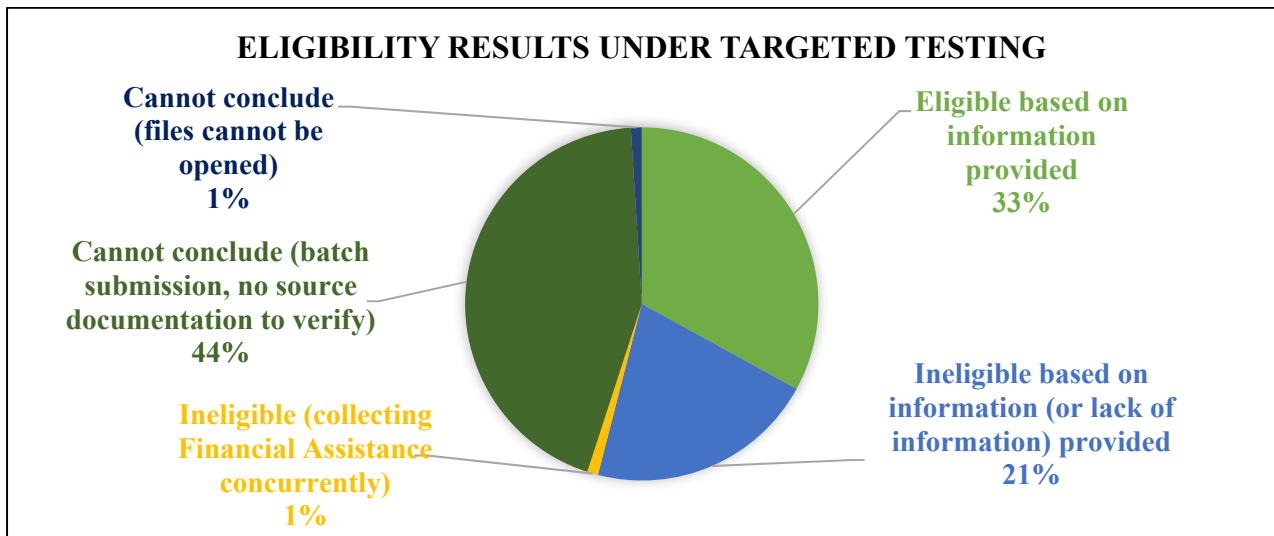


Figure 7: Results of eligibility test on 100 targeted samples from population of paid applicants

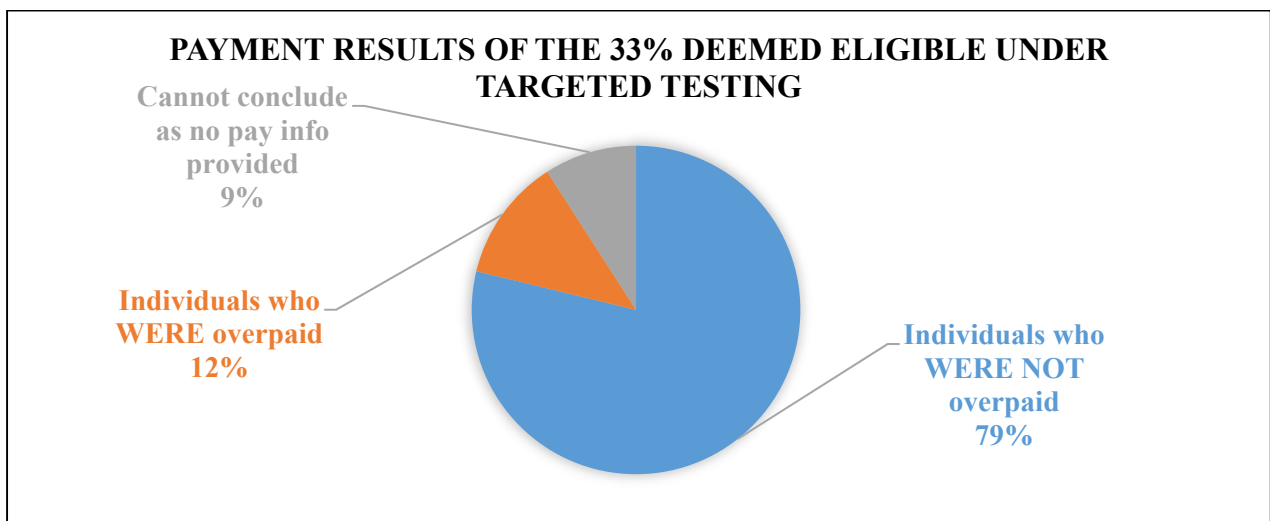


Figure 8: Results of payment test on those eligible from targeted samples from population of paid individuals

All of those individuals, we deemed ineligible (in Figure 7) and overpaid, as they did not qualify for the benefit. One percent (1%) of the paid individuals tested was inconclusive because we were unable to open the supporting documentation and hence could not conclude on applicants' eligibility or overpayment.

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Forty-four percent (44%) of paid individuals were inconclusive with respect to eligibility due to incomplete applications and earnings information being submitted via batch spreadsheets (in *Figure 7*). :

- Two percent (2%) *appear* to have been overpaid based on our recalculation
- Forty-two percent (42%) *appear* to have been paid correctly based on our recalculation

Financial Assistance Analysis

Although our targeted testing covered many areas that were deemed to be significant risks, we opted to further test one key aspect – Financial Assistance. The Regulations, Section 4, specifically states that individuals receiving Financial Assistance did not qualify for the benefit. We carried out this test by comparing the whole Financial Assistance database with the UBA database looking at full names and birth dates. We were able to match 152 individuals who received the benefit payments and were beneficiaries of Financial Assistance at some point during the period from April 2020 until March 2021. The result of this testing is shown below:

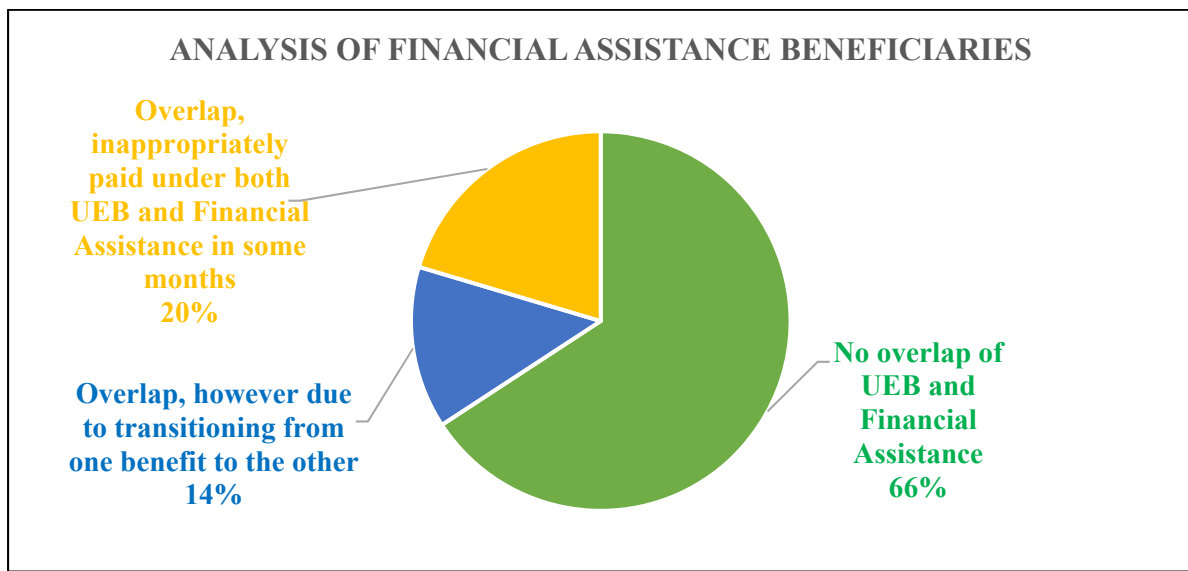


Figure 9: Financial Assistance and Unemployment Benefit Overlap

The dollar figure for those Financial Assistance recipients paid under the UEB is approximately \$200,000.

Applied but Not Paid

Our final test was a selection of applications within the UBA data, which were unpaid. Of a sample of 50 applications, no exceptions were noted. Initially, there were a number of applications within the sample which we deemed should have been paid, however further investigation showed that these applicants had been paid under different applications. As such, in our sample, we did not find any applicants who were erroneously unpaid.

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SECTION 7: DRAWING CONCLUSIONS FROM THE TESTS

In times of crisis, the agility and robustness of public finance management systems are truly tested and experience has shown that these types of circumstances can create opportunities for various types of violations that could seriously weaken the effectiveness of government actions.

It is evident that the lack of review and validation of applications (and the accompanying documents) prior to processing and payment resulted in applicants who were ineligible being paid the unemployment benefit and the overpayment of some persons who were in fact eligible. In the Government's attempt to get funding where it was needed to implement the benefit programme, mistakes were made and opportunities were present for abuse as processes, criteria, needs and controls were not necessarily considered or implemented. The information technology systems used to administer and manage the UEB programme were not initially agile enough to respond effectively to the processes required.

The examination also identified a number of areas where internal controls for recording and reconciliation of processed payments can be strengthened. Recovery of overpayments and other improper payments should be addressed as this will assist in ensuring that the integrity of the Government unemployment assistance programme is maintained. Using an integrated system that accurately collect, store, manage and interpret data in real time, the Government may then be better prepared in a similar situation. Such integrated systems should also reduce the risk of errors and omissions that are common when manual intervention occurs between more than one stand-alone system.

Additionally, the Ministry of Finance/Department of Workforce Development should design and develop detailed Standard Operating Procedures (SOPs), which can be implemented for the remainder of the COVID-19 unemployment benefit programme(s), as well as any other similar programme that the Government may undertake. These SOPs will help to ensure that employees will be able to carry out tasks correctly and consistently and reduce variation within a given process. Properly designed operating procedures will also assist in enhancing accountability and transparency with respect to the use of public funds.

Processes and procedures that will enable the early detection of payments made in error or overpayments can result in significant savings in time, effort, and costs instead of effecting recoveries after significant time lapses. Accountability for funds used and the performance of programmes remain a key focus of any Government initiative. Even in a crisis, transparency and accountability for government spending to benefit citizens and residents should be of paramount importance and cannot take a back seat to any other requirement or aspect of the initiative.

Overall, the approach taken by the Government to quickly provide financial emergency support is not uncommon or inappropriate. However, given the significant spending associated with the UEB and the likelihood that the approach taken could be used again, there are important lessons that need to be captured and appropriate action taken.

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APPENDIX A – UPDATED COST FIGURES FROM PREVIOUS REPORT⁸

Below is a summary of procurement transactions related to the pandemic as taken from the Government's JD Edwards (E1 9.2) accounting system to **April 2021**.

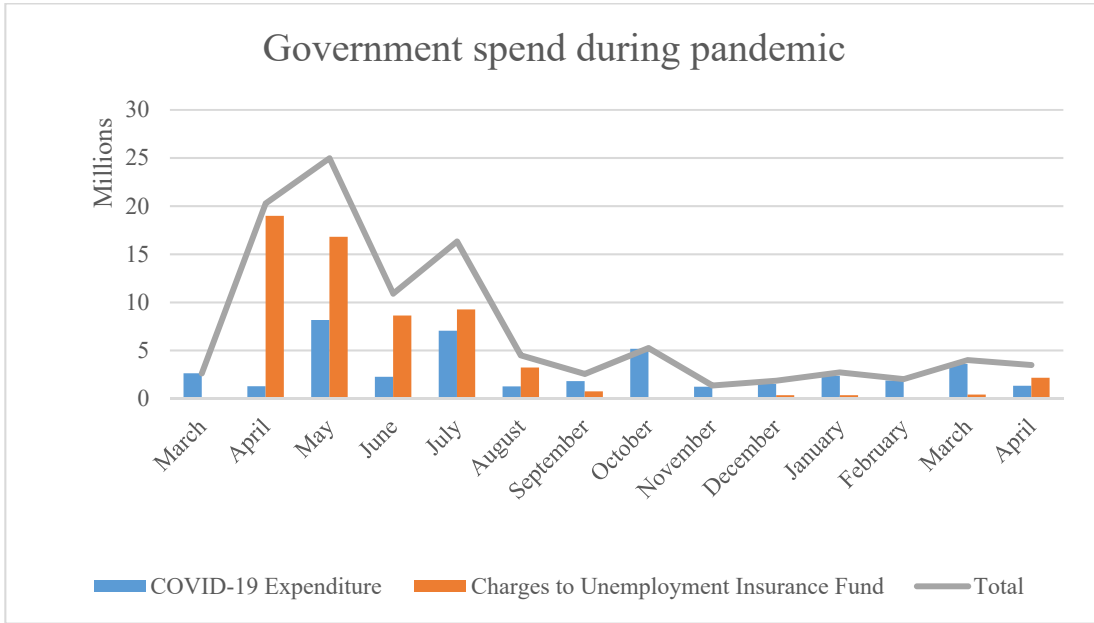
Ministry	Amount (\$)	Nature of incremental expenses
Cabinet Office	15,505,000	Grant to Bermuda Economic Development Corporation as part of a business assistance programme for small and medium-sized businesses, medical equipment and supplies, salaries, wages and overtime, quarantine monitoring system, laboratory services (Molecular Diagnostic Laboratory), medical services, etc.
Health	14,364,000	Medical equipment and protective supplies (some procured through Bermuda Hospitals Board channels), public health services such as testing sites, call center, laboratory services (Helix Genetic and Scientific Solutions), and vaccination sites
National Security	8,788,000	Embodiment of the Regiment, quarantine facilities and management, security services, medical equipment and protective supplies, cleaning, other equipment, maintenance and supplies
Transport	982,000	Security services, cleaning, medical and protective supplies, office and other supplies
Finance	764,000	Other procurement costs charged to the Contingency Fund account (majority attributable to Health)
Social Development and Seniors	602,000	Shelter administration services, security services, cleaning
Labour	382,000	Database development services on unemployment benefit administration, support staff services, cleaning
Youth, Culture and Sports	218,000	Wages, other office equipment and supplies
Legal Affairs and Constitutional Reform	1,000	Mileage reimbursement
Total	41,606,000	

Appendix Table 1: Summary of procurement by Ministry

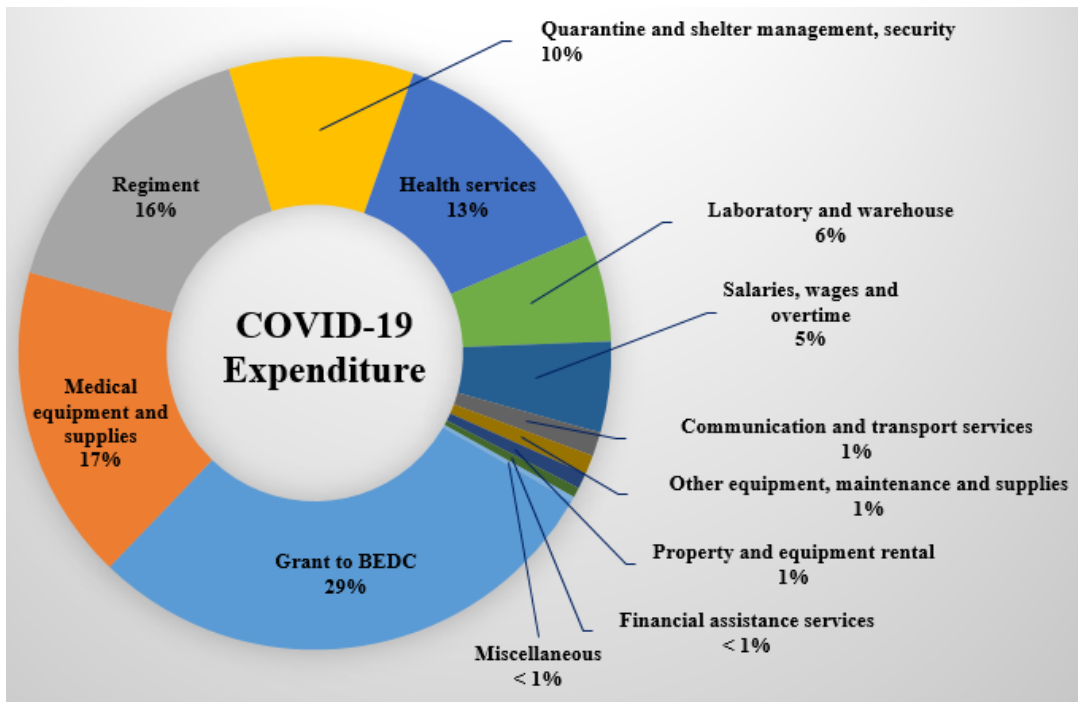
⁸ Office of the Auditor General's report *Government of Bermuda's Response to COVID-19*, February 2021

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Based on the OAG's analysis of the Government's accounting system records, the following is an unaudited synopsis of COVID-19 expenditure incurred and charges to Unemployment Insurance Fund:



Appendix Figure 1: Monthly Government spend from March 2020 to April 2021



Appendix Figure 2: Breakdown of COVID-19 expenditure to from March 2020 to April 2021 (excluding Unemployment Benefit)

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Based on the OAG's analysis of the Government's accounting system records, the following is an **unaudited** synopsis of COVID-19 expenditures from March 2020 to April 2021 by **identifiable payee** – vendors, and individuals (according to the nature of payments made to them).

Payee	Amount (\$), rounded
Individuals	73,308,000
Unemployment benefit	61,335,000
Regiment	5,730,000
Health services	5,003,000
Laboratory and warehouse	710,000
Quarantine and shelter management, security	256,000
Financial assistance services	225,000
Medical equipment and supplies	21,000
Communication and transport services	17,000
Other equipment, maintenance and supplies	7,000
Miscellaneous	3,000
Salaries, wages and overtime	1,000
Bermuda Economic Development Corp.	12,002,000
King Edward VII Memorial Hospital	4,248,000
Unidentifiable payees*	3,706,000
ResPartner Ltd	902,000
Indical Bioscience	875,000
G E T Ltd	602,000
Security Associates Limited	537,000
Helix Genetic and Scientific Solutions	493,000
Fairmont Southampton	410,000
Grotto Bay Hotel	370,000
DNA Genotek Inc	306,000
Fairmont Hamilton	300,000
Gavi Alliance	270,000
Cayman Islands Government	264,000
Amplyus LLC	216,000
Universal Security Alliance Ltd	214,000
Promega Corporation	201,000
Hub Culture Ltd	196,000
Coco Reef Resort	157,000
Social Insurance	155,000
Bioanalytical Instruments Inc	154,000
Fireminds	153,000
WeHealth Solutions	150,000
White Angels Cleaning Services	149,000
China Railway Interconnection	123,000
Digicel	123,000
Omega Medical Electronics Ltd	110,000
Tib MOLBIOL	108,000
Biomeme Inc	108,000

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Payee	Amount (\$), rounded
Kara's Kitchen Ltd	106,000
Bermuda Cleaning Ltd	106,000
Total Marketing & Communications	91,000
Weber Scientific Inc	85,000
Lighthouse Medical Supplies Ltd	79,000
Bermuda Land Development Co	78,000
Nova Star International General Trading	68,000
A F Smith Trading Co	66,000
Bermuda Electric Light Co	61,000
Rubis Energy Bermuda Ltd	60,000
CedarBridge Academy	59,000
Butterfield & Vallis	55,000
Atlantic Medical International	53,000
The Loren Hotel	51,000
Convince & Convert LLC	50,000
Bermuda Health Council	49,000
Cleanco Commercial Cleaning Services Ltd	30,000
Longtail Aviation	28,000
Ryvex LLC	28,000
Corporation Of Hamilton	27,000
Bishophouse Limited	27,000
Bermuda Blueprinting Limited	27,000
Bermuda Press Limited	25,000
Especially For You Laundry	24,000
Atlantic Cleaning & Maintenance Ltd	24,000
Safety Source International Inc	23,000
Bermuda Broadcasting Co	23,000
Tops Limited	22,000
Oxford Nanopore Technologies	21,000
RedLaser Ltd	19,000
Office Solutions	19,000
North Shore Medical & Aesthetics Center	19,000
Mode Transportation LLC	18,000
St Georges Club	17,000
TECS Bermuda Ltd	16,000
Bermuda Waterworks Ltd	16,000
Bespoke Analytics	15,000
Furniture Flair Ltd	15,000
CardioMed Supplies Inc	15,000
Island Cleaning Services	15,000
Medical House Ltd	14,000
Gorhams Ltd	14,000
Bermuda MicroSystems Group	12,000
One Communications	12,000

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Payee	Amount (\$), rounded
Marshall's Maintenance	12,000
Paradise Cleaning	11,000
D E Mortimer & Co	11,000
Inter Island Communications Ltd	11,000
Island Trading Limited	10,000
Therapeutic Consulting Service	10,000
Ocean Interiors Ltd	10,000
BGA Group of Companies	9,000
Scientific Supplies & Technology Int'l Inc	9,000
Viking Food Ltd	9,000
The HUB	9,000
Joshua Bate Trading Bermuda Ltd	9,000
T C Associates	9,000
Bermuda Gas & Utility Co	8,000
Narrative Research Bermuda Ltd	8,000
J & S Holdings Ltd. - Champs	8,000
Fedex Express	8,000
Ascendant Technologies Ltd	7,000
Minimax Forwarders	7,000
Locus Ltd	7,000
Overnight Construction	7,000
AA Solutions	7,000
Pro-Tone Cleaning Services Ltd	6,000
Cabaloo Limited	6,000
Air Care Limited	6,000
Dunkley & Pioneer Dairies Ltd	5,000
Harper Digital Entertainment	5,000
Uniquely Yours	5,000
Hott 107.5 Radio	5,000
Abacus Ltd	5,000
Audio Visual Electronics Ltd	5,000
Europa Imports Ltd	4,000
Island Press Limited	4,000
Quickie Lickie Laundromat	4,000
Pricerite	4,000
Royal Gazette Ltd	4,000
VAonlineTV Ltd	4,000
Cola Inc	4,000
Bridges International Logistics Ltd	3,000
Jae Associates Ltd	3,000
LiveNet	3,000
Convenience Coffee Ltd	3,000
Bermuda Waterproofing Systems	3,000
Kuhn International Cargo	3,000

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Payee	Amount (\$), rounded
Travel Edge Ltd	3,000
HVAC Shack Ltd	3,000
A David Atcheson Ltd	2,000
Bermuda Diabetes Association	2,000
Fast Forward Freight Ltd	2,000
Sigma Aldrich Corp	2,000
BKS Wholesalers	2,000
Rosemont Guest Apartments	2,000
Island Construction Services	2,000
Bernews Limited	2,000
Bermuda Communications Group	2,000
Filter Queen Bermuda	2,000
J Harvey Ltd	2,000
Corporation of St George	2,000
J & J Produce	2,000
Fresh Creations	2,000
Bermuda Sign Printers	2,000
Masters Ltd	1,000
A C Brewer Distributors Ltd	1,000
Pitt & Company Ltd	1,000
P & M Electrical Services & Supply Ltd	1,000
Warwick Gas Station	1,000
Fibre Net Communications	1,000
Specialized Technologies Ltd	1,000
Bermuda Motors	1,000
VinylTech Bermuda	1,000
People's Pharmacy Ltd	1,000
Bermuda Janitorial Supply Ltd	1,000
E & B Trading Company	1,000
Best Shipping Bermuda Export	1,000
Mediterranean Shipping Ltd	1,000
Keen Exporters	1,000
Sears	1,000
Undercover Tents Rentals Ltd	1,000
A & P Marine	1,000
West End Development Corporation	1,000
Ardsheal Brands Ltd	1,000
International Bonded Couriers	1,000
Scrap-Iron Trucking & Crane Services	1,000
TOTAL	<u>102,940,000</u>

Appendix Table 2: Summary of COVID-19 expenditures by identifiable payee (rounded amounts)

*Unidentifiable payees at the time of this report, we could not reconcile the amounts to source transaction entries.