

2019-2021 BUSINESS PLAN



CONSUMER
PROTECTION BC

Table of Contents

Message from the Chair and CEO.....	3
Corporate overview	4
Who we are	4
Our corporate values	4
What we do	5
How we protect consumers.....	6
How we regulate businesses	7
Meeting our mandate	8
Long-term strategic direction.....	9
Emerging public policy, consumer need and marketplace gaps	9
Regulating in a dynamic environment.....	10
Internal environment.....	10
External environment	11
Business Plan 2019 - 2021	11
Purpose of the Business Plan.....	11
Business strategies	11
Business strategy 1: Increase the frequency and focus of inspections	12
Tactics:	12
Timeline:	12
Performance:	13
Business strategy 2: Enhance protections for vulnerable consumers in the financial sector	13
Tactics:	13
Timeline:	14
Performance:	14
Business strategy 3: Add value to businesses by simplifying the licensing processes	14
Tactics:	14
Timeline:	15
Performance:	15
Business strategy 4: Enhance the consumer complaint process by leveraging technology.....	15
Tactics:	16
Timeline:	16
Performance:	16
Areas of Principal Risk	17
Operating and Capital Budget	17

Message from the Chair and CEO

On the behalf of the Board of Directors and staff at Consumer Protection BC, we are pleased to present our 2019 - 2021 Business Plan.

This plan has been updated through a collaborative process with our employees, Leadership Team and Board of Directors and has been informed by market data and our stakeholders. The plan illustrates our strategic direction and priorities, capturing both the challenges of a rapidly-changing environment as well as the opportunities before us to further strengthen consumer protection in British Columbia.

Our work to assess, recommend and respond to emerging public policy, consumer needs and marketplace changes will continue in 2019 as we support government in the development of effective legislation and regulations, potentially in such areas as high-cost lending, ticket reselling and segments of the sharing economy. Also, we will work with government to identify and update existing legislation to maintain a modern base of law, allowing us to deal with consumer protection issues of today and the future.

The four key strategies identified in this plan guide our priorities through 2021. These represent the most significant areas where we can leverage our resources to effectively meet our mandate and are intended to ensure we are prepared for the changing business practices coming over the next three years. Our first two strategies are focused on increasing the focus and frequency of inspections and enhancing protections for vulnerable consumers in the financial sector, while two additional strategies are related to simplifying the licensing process and streamlining complaint handling to better serve our stakeholders in 2019 and beyond.

We will continue to value our many effective partnerships to leverage our resources in the delivery of our mandate and present a more complete defense against illegal business practices. As the technology-boosted pace of change and disruption continues to happen, the ability to work with our government and regulatory partners at the provincial, federal and international levels is paramount to our success.

Respectfully,



Doug Enns
Board Chair, Consumer Protection



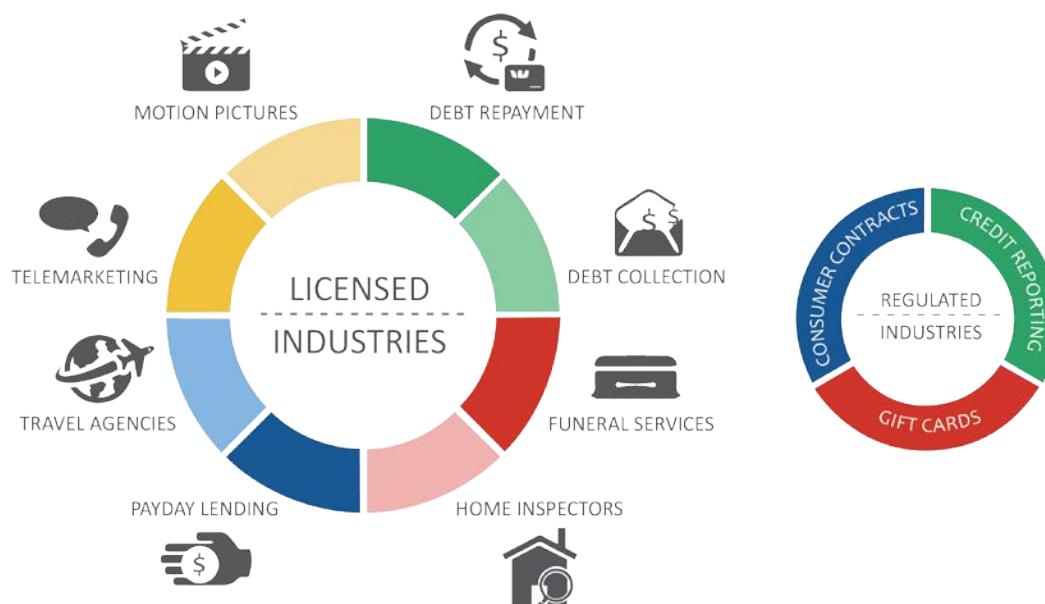
Rob Gialloreto
President & CEO, Consumer Protection BC

Corporate overview

Who we are

Consumer Protection BC is a team of dedicated and passionate individuals based in Victoria and Burnaby, who are responsible for regulating various industries and consumer transactions in the province of British Columbia (see infographic 1.0).

Our purpose is to license and inspect regulated businesses, respond to consumer inquiries, investigate alleged violations of consumer protection laws, classify motion pictures and provide information and referrals to the public.



Infographic 1.0

In the public interest and through the authority delegated by the Province of British Columbia, Consumer Protection BC is responsible for administering three Acts:

- *Business Practices and Consumer Protection Act* [SBC 2004]
- *Cremation, Interment and Funeral Services Act* [SBC 2004]
- *Motion Picture Act* [RSBC 1996]

Our revenue is generated primarily through licensing fees. This ensures licensed businesses and occupations fund annual regulatory and general consumer protection costs as required by legislation.

Our corporate values

Our corporate values are developed by our staff and cascade through our operational and governance systems. We have five corporate values:

Trust: We consistently come from a belief that we have the best interests of the organization and each other at the heart of everything that we do.

Accountability: We hold ourselves in ownership of, and take responsibility for, everything that we do.

Integrity: We behave in an honest and transparent way with each other.

Excellence: We are passionate, enthusiastic professionals continually seeking to deliver with a high level of quality.

Impact: We consistently strive to make a positive difference in the lives of British Columbians.

Our five values culminate in an overarching values statement, as follows:

We believe in accountability to ourselves and to each other, in the investment and maintenance of integrity, and in the pursuit of excellence in the delivery of services that ultimately make a positive difference in the lives of British Columbians.

What we do

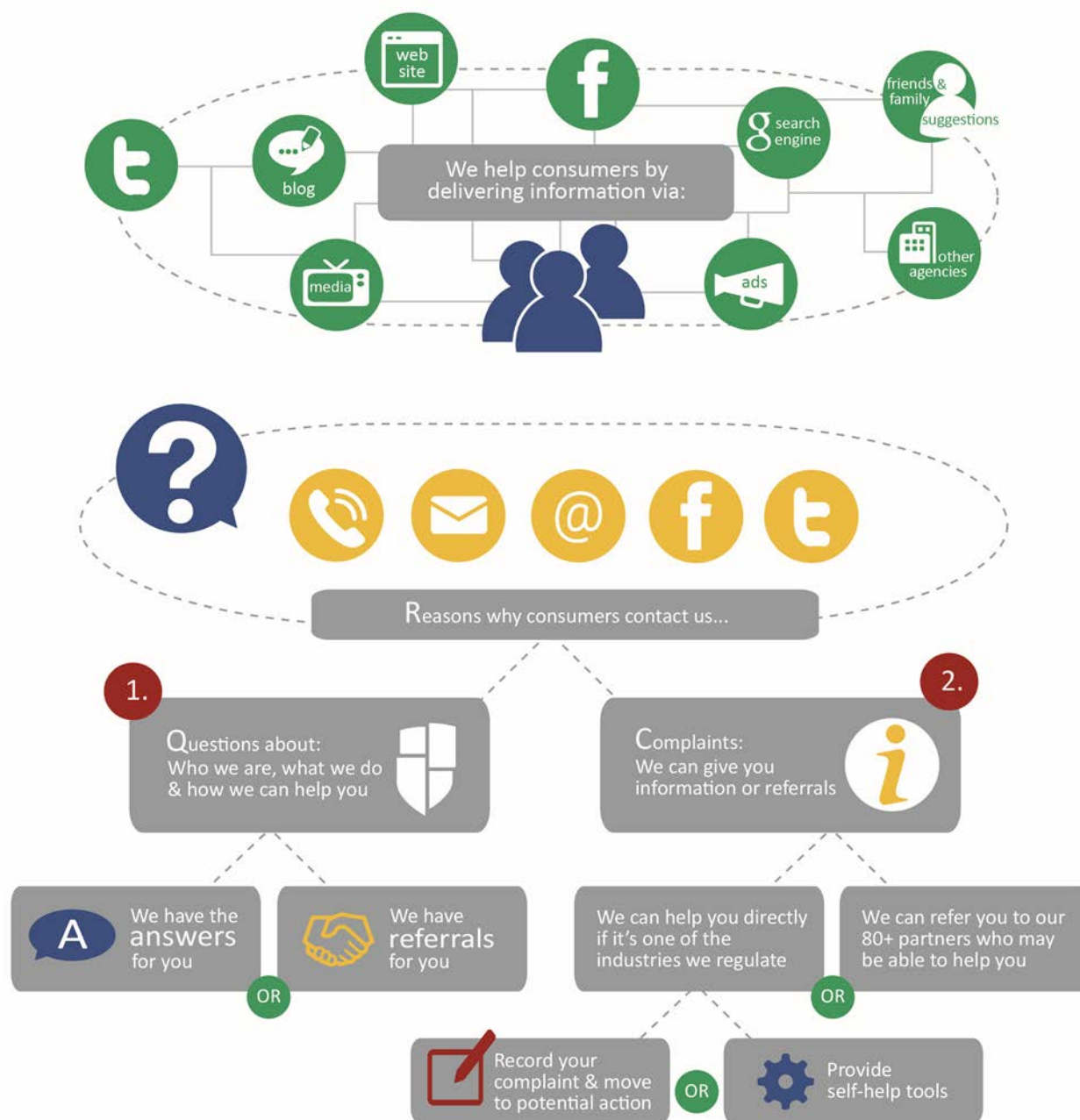
We deliver consumer protection services throughout British Columbia by:

- Educating consumers and businesses about their rights and responsibilities.
- Responding to inquiries and complaints from BC consumers and businesses.
- Licensing specific businesses and occupations.
- Inspecting licensed businesses and occupations to ensure they are following BC's consumer protection laws.
- Investigating alleged violations of consumer protection laws, then resolving through progressive enforcement.
- Classifying all motion pictures exhibited in British Columbia.
- Approving all retail adult video products sold or rented to consumers.
- Providing recommendations to government and supporting government's policymaking process regarding enhancements to consumer protection laws.

For more information about what we do, visit our website at www.consumerprotectionbc.ca, Twitter or Facebook.

How we protect consumers

Here's how we help and protect consumers:



Infographic 2.0

How we regulate businesses

Here's how we help ensure regulated business operate within the law:



Infographic 3.0

Meeting our mandate

Our mandate is the collection of corporate obligations described in the *Business Practices and Consumer Protection Authority Act* and our Administrative Agreement with the Ministry of Public Safety and Solicitor General (PSSG). These documents outline our general purpose as a delegated authority and chart specific actions and outcomes necessary for us to effectively meet our mandate and fulfill the trust given to us by the provincial government. The primary areas of focus for these mandate-driven actions and outcomes are listed in the following chart:

Our mandate	How we are meeting our mandate
Issue licences to the businesses captured in the Acts we administer (<i>Business Practices and Consumer Protection Act, Cremation, Interment and Funeral Services Act and Motion Picture Act</i>)	Average number of licences issued over the past three years = 8,817 per year.
Inspect and investigate businesses to determine compliance with the Acts we administer	Average number of inspections completed over the past three years = 340 per year.
Take progressive enforcement action to ensure businesses and occupations comply with the Acts we administer	Average number of enforcement files completed over the past three years = 250 per year.
Provide information and referrals to consumers inquiring about the Acts we administer and general BC consumer protection issues	Average number of consumer inquiries responded to over the past three years = 10,242 per year.
Provide general consumer education and information through various communication channels	Over the past three years, the average number of website page views = 1,180,370 ; the average number of blog posts published = 45 per year; the current number of Twitter followers = 6,946 ; the current number of Facebook fans = 50,610 .
Administer the Consumer Advancement Fund (CAF) to educate consumers and increase business compliance	Expenditures from the CAF over the past three years have totaled \$171,643 . These expenditures were audited to ensure they met the purpose of this fund and included: investment in consumer marketing campaigns, administration of the fund and recovery of costs related to the issuance of administrative penalties.
Provide refunds from the Travel Assurance Fund (TAF) to qualified consumers	Average amount of TAF refunds issued over the past three years = \$72,039 per year.
Classify general release motion pictures	Average number of general release motion pictures classified over the past three years = 1,904 per year.
Provide advice to government regarding changes to legislation or regulations	Over the past three years, advice has been provided to government on <i>Motion Picture Act</i> changes; <i>Business Practices and Consumer Protection Act</i> changes related to home inspectors, payday lending and debt settlement; <i>Cremation, Interment and Funeral Services Act</i> legislative and regulatory changes related to apprenticeship supervision and funeral services in remote communities.

Long-term strategic direction

Our Business Plan is a roadmap of the future for our stakeholders and presents a focus for our operational efforts as we work to maximize our regulatory effectiveness.

The Board of Directors approves the Business Plan and maintains an eye to the future. They, along with the Leadership Team, regularly assess emerging internal and external organizational factors to explore longer-term ideas and direction to improve our regulatory work and ensure organizational sustainability.

Within this longer-term focus, the Board of Directors collaborates with the Leadership Team to explore opportunities for expanded growth in our regulatory scope, partnerships or alliances with other regulatory bodies, manage ongoing cost pressures and determine the most effective regulatory approach to sectors facing significant disruption or change.

When a direction or area of focus is ready to implement, it is operationalized through such various channels as the Business Plan, workplans, corporate policies or procedures and the effective allocation of resources. The 2019 - 2021 Business Plan introduces four business strategies that will build capacity and position our organization to respond to emerging strategic opportunities and deliver operational excellence to our current stakeholders.

Emerging public policy, consumer need and marketplace gaps

Consumer Protection BC is a thought leader and catalyst for constant improvement to the BC regulatory framework through the assessment, recommendation and response to emerging public policy, consumer need and marketplace gaps. We operate in a constantly-shifting environment. Public policy is established or updated to address marketplace risks and harms and meet current demands as consumers shift their behaviour. As a regulator in this dynamic environment, we must remain vigilant around market forces and adjust our operational efforts to ensure we maximize our effectiveness. Through the course of this plan, we will work with key stakeholders to identify priorities, act to remedy consumer protection gaps and support the strengthening or creation of effective legislation and regulations by government in three key areas:

1. High-cost financial products and services

Consumer Protection BC continues to observe consumer vulnerabilities as business models in the high-cost lending sector evolve and shift over time. To better protect these vulnerable consumers, government has been reviewing high-cost financial products and services. We continue to support government on this important policy development work.

2. Ticket-reselling

Government has announced its intention to introduce future ticket-reselling legislation aimed at curbing unfair practices, including the activities of “ticket bots.” In 2018, we undertook research and stakeholder engagement activities to develop and communicate a preliminary position on how to most effectively regulate in this area, as directed by the Minister of Public Safety and Solicitor General. Our recommendations spoke to the importance of robust disclosure requirements, a prohibition on ticket bots, an appropriate regulatory scope and the need to assess cost recovery implications and options. Going forward, we will continue to monitor policy developments in other jurisdictions and support government’s policy-making process, as appropriate.

3. Ridesharing

Since 2007, we’ve provided contracted call centre and referral services to the Ministry of Transportation and Infrastructure related to the Lower Mainland Taxi Bill of Rights. As government continues their review of options for a regulatory model for ridesharing in BC, we have engaged several key government stakeholders to explore ways we can provide value to government, consumers and industry, depending on the model government

chooses to pursue. Specifically, we have encouraged government to consider two components we feel are crucial for a successful future regulatory model:

- The creation of a mandatory “BC Ride Hailing Bill of Rights” that would apply to both taxis and the ridesharing sector.
- The extension of the referral services we currently provide under the Taxi Bill of Rights and a future BC Ride Hailing Bill of Rights to the entire province of BC, for the protection of British Columbians.

4. Strategic partnerships

Over time, strategic partnerships with other regulators have not only improved the operational effectiveness of our organization but have also strengthened the BC consumer protection landscape. These strategic partnerships include organizations such as the RCMP, the Vehicle Sales Authority of British Columbia, the Competition Bureau, the Financial Institutions Commission and the US Federal Trade Commission. Throughout 2019 - 2021, we see opportunities to strategically pursue new partnerships designed specifically to increase our regulatory impact, thereby ensuring new and enhanced protections for all British Columbia consumers.

While we do not have the authority to create legislation or regulations, we are a key expert stakeholder regarding the consumer areas noted above. By working in collaboration with the provincial government and other relevant stakeholders, we will drive positive change, with varying scope, with the goal of protecting BC consumers. Our assessment of performance will, therefore, be qualitative in nature. We will report on any proposed actions or advice designed to foster greater levels of consumer protection. We will provide an overall performance description of any changes to the regulatory frameworks or consumer protection in each area. Due to the nature of these projects, timelines will be closely tied to those of the provincial government, as well as variable marketplace drivers.

Regulating in a dynamic environment

Our internal environment is defined by embracing positive change as employees develop new skills, knowledge and abilities, and new personnel bring expertise and experience in varied and developing areas. The internal environment also leverages rapid change as we invest in modern technologies to automate previously labour-intensive tasks. This allows for timely and focused allocation of resources to improve or enhance changing areas and scope of work. The external environment is also subject to shifts as government adjusts public policy (legislation and regulation), as industry responds to trends and disruption to develop innovative new methods to deliver service and as consumer behaviour shifts in subtle ways. We monitor these environments to adapt our regulatory approach and deploy our internal resources and capabilities to ensure we meet our Business Plan strategies and deliver on our purpose of consumer protection.

As it relates to the three-year cycle of this Business Plan, the following are the primary dynamic factors present in our internal and external environments:

Internal environment

The internal environment is significantly affected by the completion of recent technology investment in many operational areas, which includes:

1. Rebuilding of our online business platform (MyAccount) to support self-directed licence applications and annual business licence renewals.
2. Relaunch of our corporate website to improve the user experience and increase an understanding of the law using plain language and simple concepts.

3. Implementation of a mobile application to support compliance inspections by reducing the time required to complete inspections, ensure accurate recording of data collected and ensure that post-inspection reports are made available to our licensed businesses as soon as possible.

In addition to technology, other internal factors include:

1. Completion of the 2018 - 2020 fee review which resulted in licensing and other fees being set to recover our estimated operating costs for that time frame.
2. Implementation of various desktop and mobile hardware and software tools which have enhanced employee collaboration, access to key documents and data management.
3. Recent reassignment and realignment of human resources to ensure effective deployment into the areas that have the most positive impact on the protection of BC consumers.
4. Negotiation of a Collective Agreement that accurately represents the size and scope of our organization and provides for a flexible and accountable workforce in a quickly-changing marketplace.

External environment

The external environment is most significantly affected by:

1. Potential or pending changes to consumer protection laws and regulations.
2. Business model responses to marketplace disruptions and changes to existing regulatory schemes.
3. Emerging priorities of the provincial government elected in spring 2017.
4. Indicators that provincial economic performance will show resilience in the near term, with some economists suggesting better than forecasted growth rates.
5. Increasing Canadian interest rates, which may reduce the ability for BC consumers to service variable-rate debts, creating additional vulnerability in the financial sector.
6. Shifting consumer behaviour based on factors, including provincial demographics, debt loads and technology.

Business Plan 2019 - 2021

Purpose of the Business Plan

The Business Plan describes our business strategies for the next three years. We live the plan internally with our employees and Board of Directors, and share it with government, industry and the public as a roadmap of how we will strive to fulfill our purpose in a dynamic regulatory environment and constantly changing marketplace.

Our corporate values are consistently applied to the development and delivery of our Business Plan. They are infused into our daily operating practices and serve as a guide on how we choose to act and behave as we go about our work. The plan also summarizes areas of principal risk, which are identified by the Board and are mitigated on an ongoing basis to ensure that risk exposure is minimized.

Business strategies

The strategies presented in the Business Plan are specifically designed to improve or enhance our effectiveness as a regulator. They strive to ensure we are making the most productive use of our internal resources and capabilities to deliver services and respond to dynamic shifts in the regulatory environment. The business strategies presented below articulate how we are going to be better, including the specific steps (or tactics) we will take, coupled with clear measures of what success will look like.

Business strategy 1: Increase the frequency and focus of inspections

Being a highly-effective regulator means being able to detect, and subsequently correct, non-compliance with BC's consumer protection laws through in-person inspections. This business strategy asserts that we can increase our regulatory effectiveness and general consumer protection by increasing the frequency and focus of inspections each year¹. Completing more inspections will not only allow us to uncover more cases of non-compliance, but will also offer secondary opportunities to:

- Educate our licensed businesses to reduce the likelihood of future non-compliance.
- Deter other licensed businesses from engaging in non-compliant activities.
- Gather intelligence about shifts in consumer behaviour or the business models of our licensed sectors.
- Raise awareness of the value we provide to our licensed businesses.

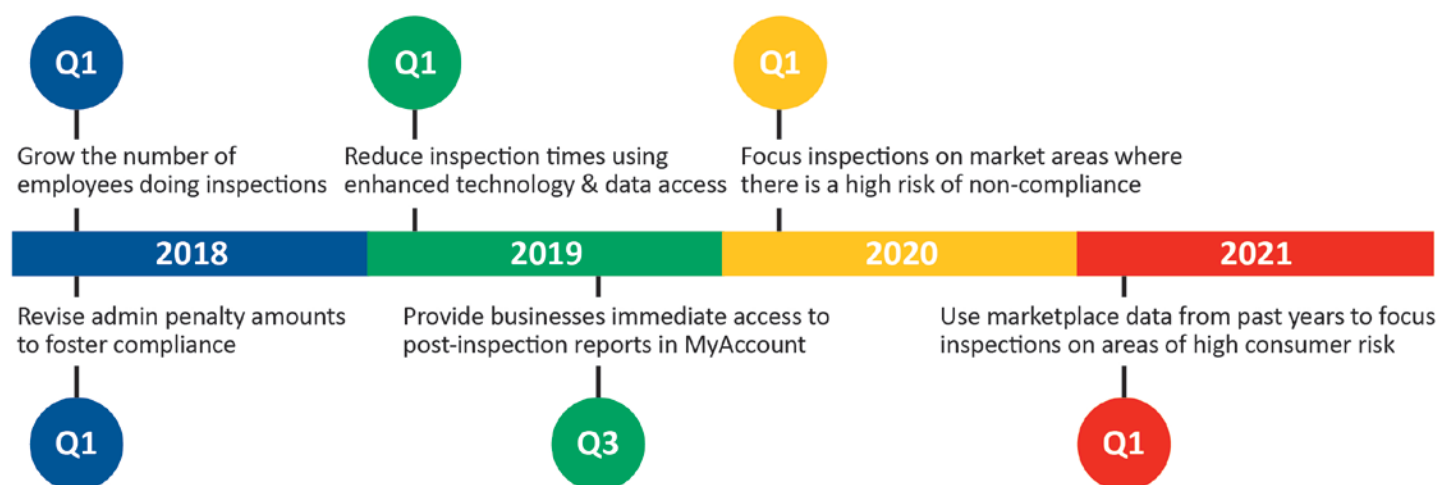
Tactics:

We will:

1. Increase the number of employees dedicated to completing compliance inspections. (Complete)
2. Revise administrative penalty amounts to have a positive measurable effect on compliance. (Complete)
3. Reduce the time it takes to conduct and report on each inspection using enhanced mobile technology and improved data access. (Q1 – 2019)
4. Provide immediate access to post-inspection reports by improving MyAccount capabilities. (Q3 – 2019)
5. Focus inspections on market areas with a high risk of non-compliance. (Q1 – 2020)
6. Focus inspections on areas or themes based on a proactive and deep analysis of general marketplace data and intelligence collected during past inspections to identify anomalies and patterns that may indicate areas of high consumer risk. (Q1 – 2021)

Timeline:

The timeline below outlines the scheduled completion date for each tactic listed above:



¹ This strategy is continuing from 2018. For clarity and continuity of information, the completed 2018 tactics are listed below and included in the timeline. This strategy will be completed at the end of 2021.

Performance:

This business strategy is focused on consistent improvement over a three-year period. The actual results from 2018 are listed and the performance targets for 2019 - 2021 are presented in the following chart:

Performance Measure (Target)	2018	2019	2020	2021
Number of compliance inspections completed annually	425	625	750	775
Percentage of random inspections where business compliance is confirmed²	n/a	89-93%	90-94%	91-95%
Rate of compliance achieved following enforcement action	73%	75-79%	76-80%	78-82%

Business strategy 2: Enhance protections for vulnerable consumers in the financial sector

Consumer protection law is deeply focused on the realities of the financial sector and the impact debt can have on consumers. Collaboration with government to implement enhancements to BC's payday lending laws has been ongoing since 2009 and will continue as business models change. We will also continue to gather and analyze data and trends and engage with other stakeholders to identify specific areas in the financial sector where consumers are especially vulnerable. To protect these consumers, we will use our regulatory authority, leverage strategic relationships and share information with government to support relevant public policy development and influence meaningful change.

Tactics:

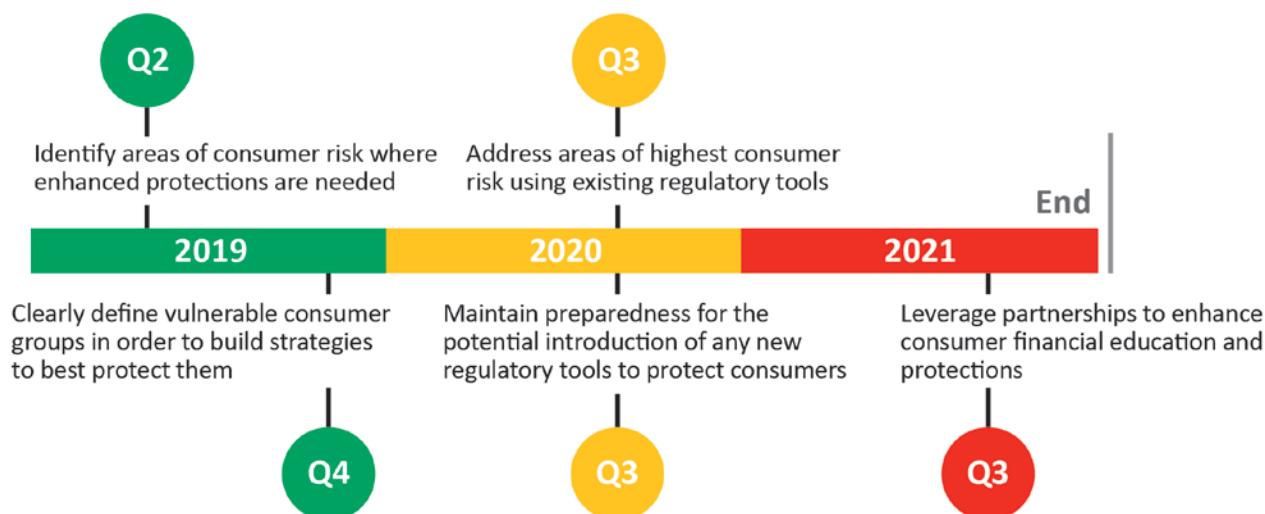
We will:

1. Identify and assess areas of consumer risk in high-cost lending and related sectors where enhanced protections are needed. (Q2 – 2019)
2. Clearly define “vulnerable” consumer groups demographically in order to build focused strategies to protect them and best serve in the public interest. (Q4 – 2019)
3. Maintain preparedness for the potential introduction of any new regulatory tools to protect consumers in high-cost lending and related sectors. (Q3 – 2020)
4. Address areas of highest consumer financial risk using our existing regulatory tools. (Q3 – 2020)
5. Leverage partnerships to enhance financial sector consumer education and protections. (Q3 – 2021)

² For 2021, this performance target will not be relevant to any theme-based inspections. Inspections related to the theme identified will likely result in high levels of non-compliance, therefore this performance target would not be a relevant place to measure the outcomes of these themed inspections.

Timeline:

The timeline below outlines the scheduled completion date for each tactic listed above:



Performance:

Performance targets for 2019 - 2021 establish the performance levels that indicate successful achievement of this strategy.

Performance Measure (Target)	2018	2019	2020	2021
Theme-based inspection campaign(s) based on high-risk areas for consumers	n/a	n/a	1	2
Joint consumer financial education and protection initiative	n/a	n/a	n/a	Complete
Engage in a data-driven process to define “vulnerable” consumers in British Columbia and build and adopt a focused strategy to protect them	n/a	Complete	n/a	n/a

Business strategy 3: Add value to businesses by simplifying the licensing processes

Simplifying the licensing process allows existing businesses and new applicants to easily navigate our online business platform and submit all licensing requirements quickly and efficiently. This adds value by reducing the burden of regulatory compliance as part of their daily operations. It also allows us to reallocate our internal resources to place greater focus on initial compliance checking, auditing of the information that is submitted and more effective management of consumer and business complaints. Recent investments in our online business platform (called MyAccount) along with the combination and simplification of forms, has set the stage for this business strategy.³

Tactics:

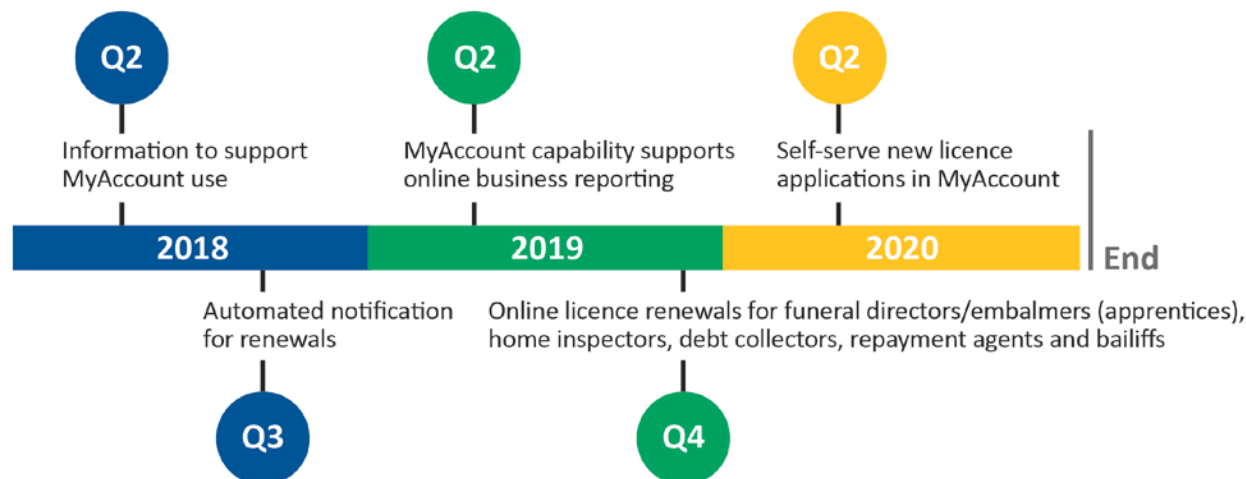
We will:

³ This strategy is continuing from 2018. For clarity and continuity of information, the completed 2018 tactics are listed and included in the timeline. This strategy will be completed at the end of 2020.

1. Develop information to support self-directed licensed business use of MyAccount. (Complete)
2. Implement automated notifications for renewals and other licensing deadlines. (Complete)
3. Increase MyAccount capabilities to support business reporting on the platform. (Q2 – 2019)
4. Implement online licence renewals in MyAccount for funeral directors/embalmers (and apprentices), home inspectors, debt collectors, debt repayment agents and bailiffs. (Q4 – 2019)
5. Implement a self-serve, new licence application process in MyAccount. (Q2 – 2020)

Timeline:

The timeline below outlines the scheduled completion date for each tactic listed above:



Performance:

This business strategy is focused on consistent improvement over a three-year period. The actual results from 2018 are listed and the performance targets for 2019 and 2020 are presented in the following chart:

Performance Measure (Target)	2018	2019	2020	2021 ⁴
Average time to complete a business licence application or renewal	4 days	3-4 days	3 or less days	-
Overall quality of licensing processes	82%	80-83%	83-86%	-
Incomplete new business applications submitted	67%	60-70%	30-40%	-

Business strategy 4: Enhance the consumer complaint process by leveraging technology

Our Licensing and Information Services team gets more than 10,000 consumer inquiries each year. Historically, about 34% of these are within our regulatory authority and 66% are about issues where other agencies are better positioned to help. Our staff respond to all inquiries with information and referrals, which can be a time-consuming process. Streamlining the consumer information and complaints process will significantly reduce the amount of time consumers have to wait to get information about their issue.

⁴ In 2021 these targets will be measured internally; given that the business strategy is coming to an end, they will not be included in the Business Plan or Annual Report.

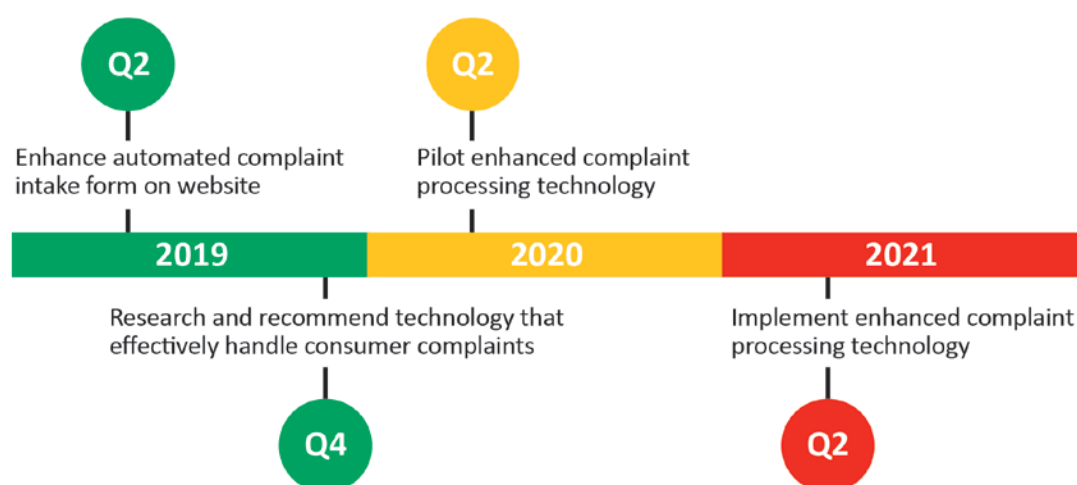
Tactics:

We will:

1. Enhance the automated complaint intake form on our corporate website. (Q2 – 2019)
2. Research and recommend enhanced technology solutions that effectively handle consumer complaints. (Q4 – 2019)
3. Pilot enhanced complaint processing technology. (Q2 – 2020)
4. Implement enhanced complaint processing technology. (Q2 – 2021)

Timeline:

The timeline below outlines the scheduled completion date for each tactic listed above:



Performance:

This business strategy is focused on modernizing and enhancing the methods we use to receive information from, and then respond to, BC consumers. Measures presented for 2018 are provided as a baseline, while specific targets for 2019 - 2021 establish performance levels that indicate the successful achievement of this strategy.

Performance Measure (Target)	2018	2019	2020	2021
Reduce average wait times for written complaint responses	10 days	4-6 days	2-4 days	0-2 days
Decrease volume of phone and email complaints by increasing online information.	11,300 ⁵	10,800-11,100	10,500-10,800	9,600-10,200
Usefulness of complaint processing technology (based on completion survey)	n/a	n/a	Baseline	Baseline +10%
Completion rate for complaint processing technology	n/a	n/a	Baseline	Baseline +10%

⁵ This is the average number of consumer complaints from 2017 and 2018. The target ranges for 2019 - 2021 are estimated based on a percentage change from the 2018 baseline.

Areas of Principal Risk

In each business planning cycle, the areas of principal risk are articulated, a risk appetite for each area is established and risk tolerances are set (which are monitored and mitigated). The current areas of principal risk include:

Financial risk	Specific risk factors include investment, liquidity, capital and business model risk. Mitigation efforts ensure enough liquidity and capital to meet our long-term operational obligations.
Legal risk	Specific risk factors include civil litigation, judicial review and tribunal risk. Mitigation efforts focus on consistent and reasonable administration of our delegated authority, supported, where necessary, by sound legal advice and experienced legal counsel.
Compliance risk	Specific risk factors include act and regulation, laws and contract (agreement) risk. Mitigation efforts focus on the completion of regular compliance assessment procedures with various stakeholders, including the Ministry of Public Safety and Solicitor General, Office of the Information and Privacy Commissioner for BC, legal counsel and our auditors at Grant Thornton.
Technology risk	Specific risk factors include data breach, data loss and system failure risk. Mitigation efforts focus on the readiness of our Business Recovery Action Plan and the evolution of our IT Disaster Recovery Plan, which specifically protects our data and systems from intrusion and creates data redundancy.
Reputation risk	Specific risk factors include licensee, government and public risk. Mitigation efforts focus on clear and concise communication with all stakeholders and providing corporate responses to any regulatory or operational issues in a timely and transparent manner.

Operating and Capital Budget

The following budgets outline the financial and human resources required to deliver our overall regulatory purpose and achieve the targets articulated in the Business Plan for 2019 - 2021. We have assessed the viability of all future revenue streams and maximized efficiencies through cost savings, wherever possible. This process is a continuation of the balanced financial direction we have taken since our establishment in 2004.

Operating budget⁶				
Resources and outputs	Fiscal year (\$ thousands)			
	2018	2019	2020	2021
Total revenue	\$6,287	\$6,579	\$6,768	\$6,864
Total expenditures	\$6,143	\$6,499	\$6,543	\$6,717
Excess of revenues over expenditures	\$144	\$80	\$226	\$146
Full time employees (FTEs)	42	46	46	46

Capital budget				
Resources and outputs	Fiscal year (\$ thousands)			
	2018	2019	2020	2021
Base and planned expenditures	\$82	\$130	\$245	\$150
Program expenditures	-	-	-	-
Total	\$82	\$130	\$245	\$115

⁶ 2018 information is based on year-end estimates from the Q3 2018 Financial Statements.