

NINTH

Middle East Investment Panorama



February 2019

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Foreword

Welcome to Insight Discovery's ninth Middle East Investment Panorama (MEIP), the annual and comprehensive report on the views of the financial advisers of the Gulf Cooperation Council (GCC) countries.



As ever, the role of financial advisers is more important than in other parts of the world. This is because the GCC economies are dependent on expatriate (expat)

workers at all levels of the job markets. Most expats see their time in the region as an opportunity to save a nest egg. Few are financial experts. The wealthier expats are keenly aware that they need professional advice. This year's MEIP report includes the results of our survey of 215 expats based in the United Arab Emirates (UAE), which looks at their attitudes towards savings and financial advisers.

At 125, the number of advisers whom we interviewed for this report is significantly smaller than the number of last year's MEIP report. This is reflected in the title of this year's MEIP report – (Quality trumps quantity in financial advice). Anecdotal evidence abounds of a fairly brutal culling in the number of people employed as financial advisers in the region.

We would attribute this culling to three factors. One is a generally unfavourable geopolitical environment. The imposition of sanctions in mid-2017 against Qatar by Saudi Arabia, the UAE and other countries have complicated the plans of Qatar's government to develop its financial centre. Delays to the Initial Public Offering (IPO) of Saudi Aramco (the state-owned energy company) and other developments suggest that the transformation of Saudi Arabia's economy in line with the government's Vision 2030 and the National Transformation Program (NTP) will take longer, and be harder, than had previously been envisaged.

As of late 2018, global energy prices are softening once more. All these issues are consistent with less demand for (highly paid) expats and, consequently, the services of the advisers across the region.

The second factor has been the tendency for expats to be better informed and more demanding. Increasing numbers of expats were dealing directly with asset managers and international life companies - without reference to an intermediary such as a financial adviser. Two years ago, in our MEIP report for 2016, advisers saw this trend as a serious - indeed, existential - threat for their businesses. In 2017, it appeared that the advisers, collectively, had responded to the challenge: once again, they were being seen by the expats as offering value. However, some financial advisers must have seen their business contract to the extent that they chose to move elsewhere.

Thirdly, the economics of the financial advisory business have been challenging. As expats have demanded greater transparency, and as regulators have placed caps on commissions, revenues have been under downwards pressure. At the same time, increased costs of regulation, compliance and much else besides have been rising.

The title of this report also reflects another, and much more positive, truth. The surviving financial advisers are delivering greater value to the expats, are coping with heightened regulatory requirements and are more profitable.

For many business leaders in the advisory industry, the main threat comes no longer from disengaged clients or burdensome regulation, but from competitors. Those competitors include the (dozen or so) wealth management firms that have established operations in the Dubai International Financial Centre (DIFC).

Taking a five-year view, it is likely that the wealth management firms will be much more important than they are today. Indeed, it is possible that 'wealth manager', rather than 'financial adviser' is the normal self-description of someone who helps the GCC's expats to save and invest.

Once again, we are grateful to the financial advisers and expats who took part in our survey, as well as to our sponsors.

Nigel Sillitoe, CEO, Insight Discovery Limited

To illustrate how much culling has been going on over the past year is highlighted in the table below. Whilst a number of advisory firms have shrunk their total number of advisers a couple of well-known firms have attracted new advisers by recruiting talent from some the firms which have been suffering.

Number of financial advisers	Jan 2018	Jan 2019	Change
Company A	85	75	-12%
Company B	40	5	-88%
Company C	26	12	-46%
Company D	10	25	+250%

PROFESSIONAL BODIES







At A Glance

The numbers that really matter

Latest MEIP...

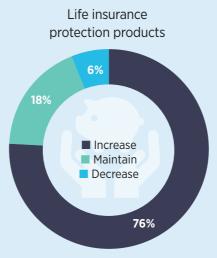
Headline results of consumer survey about their attitude towards financial advisers

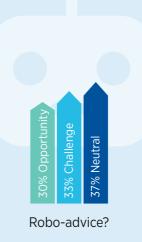
- Expat clients different to advisers.
 The expats are younger, with 90% aged 50 or less. The expats are less European, in that 78% come from Asia.
- Many expats can't save. Some 49% save less than 5% of their monthly income, if at all. Only 43% of expats have actually used the services of advisers.
- Earning respect is a work in progress. Among expats who have used advisers, 43% have positive views of advisers, while 19% have negative views.
- Ways to improve. Some 39% of expats think that fees and commissions should be more transparent. Almost as many - 37% - think that regulators need to be tougher on scams and unregulated firms.

Headline results from MEIP adviser study

- Advisers divided about clients' enthusiasm. Some 43% of advisers see the lack of willingness of clients to invest as a challenge, while 45% see clients' willingness to invest as an opportunity. The numbers were similar in late 2017.
- Advisers more bullish generally.
 Now, 54% see the regulatory landscape as an opportunity, up from 42% in 2017. The number seeing geopolitical opportunities has risen from 17% to 24%.
- New competitors the main challenge.
 Competitors are seen as a threat by
 37% of advisers, or slightly more than in 2017 (34%). The number seeing competitors as an opportunity has fallen from 21% to 17%.
- Robo-advice? Advisers are more or less evenly split between those who see robo-advice as an opportunity (30%), those who see it as a challenge (33%) and the rest (37%).

- New business models. The split between initial fees/commissions and recurring fees/commissions has shifted from 72%/28% to 61%/39%. The number worried about the impact of commission caps and greater disclosure on their business models has fallen from 26% to 7%.
- Responding to better informed clients. Over the last 12 months,
 55% of advisers have increased their usage of Discretionary Fund Management (DFM) services, while 42% have increased usage of exchange-traded funds (ETFs). Meanwhile, numbers increasing their usage of fund platforms and multi-asset funds are 56% and 52% respectively. Usage of all of these products and services will likely increase further in the coming year.
- Wanted from international life companies. Some 66% of advisers rate improved administration by the international life companies as a top priority. Almost as many - 64% - feel similarly about detailed disclosure of all fees and charges.







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Key Insights

The advisers and their expat clients

This report highlights challenges and opportunities for the UAE's economy as a whole and not just for one part of the financial services industry.

There may have been a time in the past when being a financial adviser in the GCC countries was an easy and lucrative business. If so, that time is long past.

Demand for labour of expatriates (expats) who are the clients of the advisers has fallen or is less than had been expected two years ago: this is particularly the case outside the UAE, which is emerging as the key centre of the financial advisory industry in the region.

The expats are younger and more Asian than the advisers. Almost half of them are (virtually) unable to save. Most of the remainder have used the services of financial advisers, but have mixed views about the value that the advisers provide. For this reason, engagement of clients remains a problem for a number of advisers.

Nevertheless, the reduced number of advisers that have survived the challenges of 2018 – in part because they have heard the complaints of the expats and have responded – are more profitable. In other words, quality is up even if quantity is down, as the title of this report makes clear. For many, revenues have increased thanks to greater numbers of, or activity by, clients. Rising regulatory costs is a problem for a majority of advisers. However, cost inflation generally is clearly less of a problem than it was in late 2017. Significant numbers of advisers report that expenses have fallen.

At a time of softness in oil prices and geopolitical uncertainty, businesses have cut costs by employing fewer and cheaper expats. Greater value for the expat clients embraces three concepts. One is clearly greater transparency, which is also something that the advisers want from the international life companies (and, one must presume, the international asset managers). The second concept is lower costs. This is reflected in the continuing growth in advisers' appetite for ETFs. The third concept is greater sophistication of services that are provided by the advisers to increasingly knowledgable clients. This is reflected in the greater demand of advisers for DFM services, fund platforms and multi-asset class solutions.

Conversely, it remains obvious what are the products and asset classes that the expats do not see as value. These include GCC-region securities: many of the expats see the region as a place in which to earn (and save) money, but not one in which they wish to invest. Hedge funds, too, appear to have limited popularity. The same is true of Sharia-compliant bonds (Sukuks) and equities. Perhaps because of challenges in GCC real estate markets, the expats and the advisers appear to have little appetite for property.

As the universe of expats changes, in that there are fewer but wealthier and more sophisticated clients of the advisers, it will become more necessary for the advisers to tailor the solutions that they offer. Over time, the need of the expats for face-to-face contact with advisers will grow. As of late 2018, it is not at all clear what is the role that roboadvisers will play.

Some of the advisers have been able to respond to the needs of the wealthier, if fewer, expat clients. Many have not. Many of the survivors see competition from new advisory firms as a key threat. Those firms include the wealth management firms that have opened their doors in the UAE over the last two years or so. Relative to the established advisers, the wealth management firms appear to have greater ability to serve wealthier expats, all of whom would meet generally accepted definitions of 'Mass Affluent' or 'High Net Worth Individuals'. Many of the new wealth management firms have established operations in the DIFC. The legal system of the DIFC is based on that of England & Wales: this is likely also to be seen as an advantage relative to advisory firms who are overseen by the UAE's onshore regulators.

This, the 2018 edition of MEIP differs very markedly from previous editions in one really important respect. It includes an examination of who are the expats and what they want. This year, our story is one of significant adjustment in the economies of the GCC region. At a time of softness in oil prices and geo-political uncertainty, businesses have cut costs by employing fewer and cheaper expats, many of whom cannot afford to save much. Advisory groups have responded by concentrating efforts in the UAE and/or by focusing on wealthier and more sophisticated expat clients.

This year's MEIP is much more than an overview of one part of the region's financial services sector.



Promoting sustainable long term pension provision

Frank Carr, Chief Marketing Officer, Financial Risk Solutions

Recent years have seen major demographic changes across the Middle East. Increasing affluence amidst rapidly-growing middle and upper middle classes, as well as non-locals choosing to stay in the region longer through extended contracts with employers as well as the recent visa changes which mean that non-Emiratis who have established businesses and own property in the UAE, now do not have to look to exit their businesses or sell property holdings at retirement. Like many places, people in the Middle East now have the means to make provision for their winter years, but are often choosing not to. In fact, HSBC's Future of Retirement report 2017 found that only 44% of UAE respondents feel they will be 'comfortable in retirement', and 63% plan to work 'to some extent' into retirement.



The UAE Federal Law No. 7 of 1999 for Pension and Social Security applies to UAE nationals working in the government and private sectors. However, expatriate workers are not entitled to pension but are entitled to end-of-service benefits also known as gratuity or severance pay but that is subject to a maximum of two years' pay. Gratuity is not mandatorily separated from the employers' balance sheets, and the vast majority of UAE companies do not keep the money in a different account from their working capital. Retirement savings provision is a major issue for many ex-pats who simply are not putting aside enough of their monthly salary and face a retirement with inadequate financial resources.



There have been some soundings of reform over recent years, with Gulf News reporting at the end of 2017 that a report recommending a percentage of foreign employees' salaries at government, semi-government and private sector firms be deducted each month and deposited in a new fund. It also suggested possibly seeding the fund with the existing end-of-service liabilities from participating employers, thus replacing the current gratuity practice too.

Prudent World-Leading Pension Legislation:

The best pension structures globally are those co-funded by employees and employers. Examples to be lauded include Australia's Superannuation schemes, where approximately 12% of salary is mandatorily put into a personal pension pot and the UK, which is only 6 years old, but 8% (from April 2019) is already mandatorily put into personal auto-enrolment accounts.

The UAE has an opportunity to become a leading jurisdiction in retirement provision by introducing mandatory pension provision for all workers. If this is legislated, then the UAE will join Australia, the UK and others who can truthfully say that going forward there will be virtually no more poor old people, only ones with appropriate old-age financial provision.

High standards of regulation and investment administration are required when there are mandatory pension provisions; this requires the best dedicated market systems to automate the middle and back office to maximise administrative cost efficiencies, particularly when workers are compelled to make contributions.

The size of the market, specifically the amount of new annual contributions, means that automation is essential. So too is a corporate culture promoting excellence in retirement savings, and having administration systems aligned with this culture, by using a framework and target operating model which is continuously improving.

Geographies with mandatory pension contributions are limiting, if not removing entirely, the liability of old age costs on the state. It is simply too costly today for any state to have taxpayer funded schemes to cater for its retiring population and equally citizens cannot expect a comfortable retirement income at the end of their careers unless they part fund it personally.

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Demographics

Who are the survey respondents in MEIP?

At first glance, the interviewees for MEIP 2018 are very similar to those of previous MEIP reports.

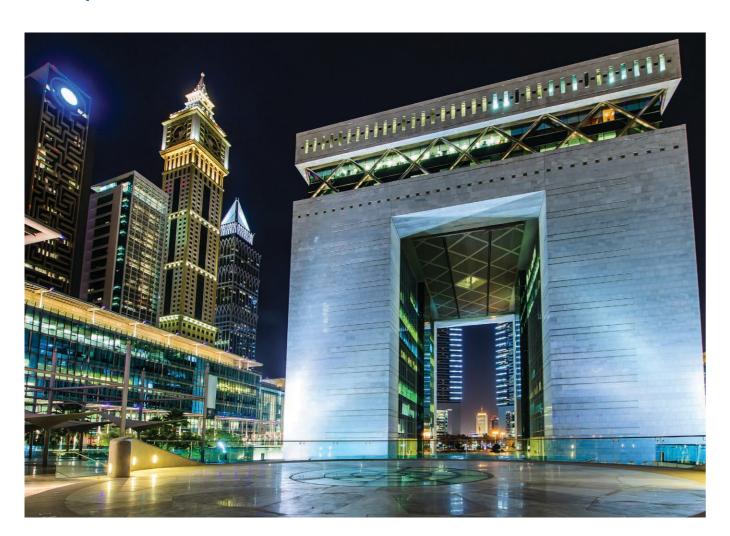
Some 88% of the interviewees work for financial advisory or wealth management firms. The remainder are employees of banks or other organisations. Of the interviewees, 56% are financial advisers or wealth managers who actually deal with clients.

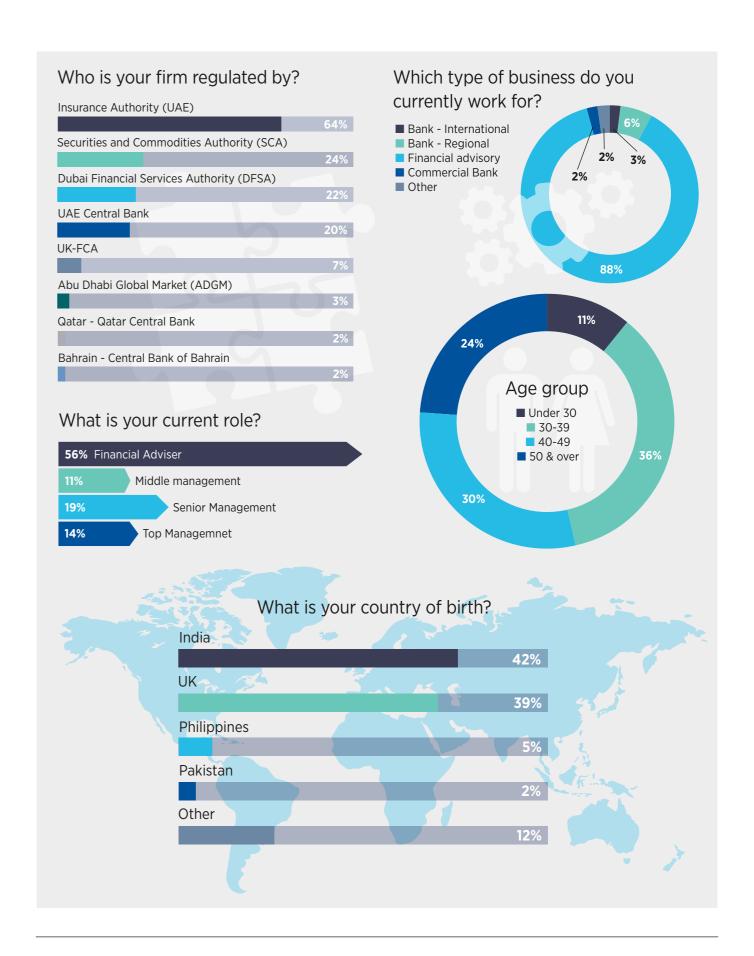
The other interviewees are middle management (11%), senior management (19%) and top management (14%). The interviewees are typically in their peak earning years and are predominantly from India (42%) and the UK (39%).

As is the case in previous years, many of the interviewees work for firms that are overseen by more than one regulator. Relative to previous years, fewer of the respondents are based in, or overseen by the regulators or, Qatar and Bahrain. The financial advisory industry of the GCC region is becoming concentrated in the UAE – and in the DIFC in particular.

At 123, the number of survey respondents is smaller than in previous years – as would be expected given the reduction in the number of advisers.

The financial advisory industry of the GCC region is becoming concentrated in the UAE – and in the DIFC in particular.





The (Wealthy) Expats At A Glance Who are they, and what do they think about saving?

The economies of the GCC countries depend on expat workers at all levels of the job market. As a group, the expats are younger and far less European than the financial advisers who work with the wealthier expats.

Some 46% of expats are younger than 40 and 76% are younger than 50. Nearly four fifths – 78% – come from Asia, where India, Pakistan and the Philippines are overwhelmingly the most important home countries. Only 12% come from Europe, where the UK is the most important home country. Very few expats come from anywhere in the Americas. Nearly half (46%) of the expats that we surveyed described themselves as 'middle management'. Another 23% saw themselves as operators or entrylevel employees. The remaining 31% consider themselves to be from senior or top management echelons.

The main incentive for the expats to come to live and work in the GCC countries is that they can earn and save (far) more than they could in their home countries. Sadly, nearly half are unable to save much at all: indeed, 22% of the expats whom we surveyed told us that they save nothing, while another 27% save less than 5% of their monthly income. Another 13% say that they save between 6% and 20% of their monthly income, with most of this group at the lower end of this range. Another fifth of (mainly wealthier) expats save 21-30% of their monthly income. Only 16% save more than this.

Retirement – usually after they have returned home or moved to a third country – is only one of many eventualities for which the expats prepare. When asked to identify their main financial priority, 28% of expats said that they are starting a savings plan (for unspecified purposes). Other priorities include retirement planning (16%), estate planning (12%) and school fees (11%). Between 5% and 9% of expats identified each of: life insurance; investment of a lump sum; critical illness cover; mortgage payments and; medical insurance.

If they are able to save money, most expats will at least consider using the services of a financial adviser. We found that 43% of all UAE-based expats have used financial advisers in that country. The 57% who have not used financial advisers includes many expats who are able to save very little (if at all). The expats' experiences with the financial advisers have been mixed but, on the whole, positive. Among the expats who had not used the services of financial adviser, 36% had positive perceptions of advisers, while 54% had broadly neutral perceptions. Just under 10% of this group had negative perceptions. Among the expats who actually have some experience of financial advisers, 19% have negative perceptions of advisers: however, 43% have positive perceptions.

These figures suggest that recent changes have been positive for how financial advisers are perceived. Some 17% of the expats said that independent financial advisers have the worst reputation among various professional groups in the UAE. However, greater numbers identified recruitment companies (24%) and call centre operators (22%) as having the worst reputations. Advisers from banks and real estate agents were perceived almost as badly as the independent financial advisers.

The expats suggest that change in three areas could further improve the reputation of the UAE's financial advisers. Some 39% of expats suggest that there should be more transparency on fees and commissions. Another 37% think that the local regulators need to be tougher on scams and unregulated firms, while a further 15% argue that the advisers need to have industry-recognised qualifications.

Nevertheless, the good news for the advisers is that their services are needed and that perceptions of them are improving. Disengagement by clients – with increased numbers of expats taking a do-it-yourself (DIY) approach to investment – has been a problem for some advisers, but not for all. The advisory community has become fewer in number, but stronger. Quality trumps quantity.

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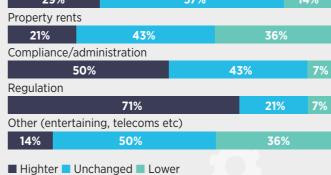
How Advisers See Things

Relative to a year ago, how have the following costs changed in your business?

Wages and salaries

29%

Property rents

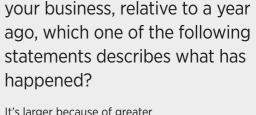


Looking at the total revenue for your business, approximately what percentage is from...?

61.15%

■ Initial fees/commission

Recurring fees/commission



When describing the revenue in

It's larger because of greater transactions for/AUM of clients

13%

It's larger because of both of these factors

339

It's larger because of a greater number of clients

13%

It's more or less the same size as it was a year ago

27%

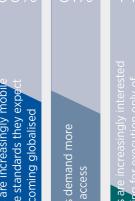
It's smaller because of both of these factors

13%











What Has Really Changed Since Late 2017?

The advisers' views of the challenges and opportunities continue to evolve

The biggest change for the UAE's financial advisory industry since late 2017, when Insight Discovery's last MEIP report was published, has been a reduction in numbers.

Pressures have come from three directions. Numbers of wealthy expats have fallen, in part because of unfavourable geopolitical developments involving Qatar and Saudi Arabia. A number of expats have been dealing directly with international asset managers and life companies. For many advisory firms, costs have been rising at a time that revenues have been stagnant or falling.

The surviving financial advisers see the world in which they operate rather differently – and for the most part more positively – than those who participated in our survey for 2017's MEIP report. This year, 43% of advisers see geopolitical issues as a challenge, while 24% perceive geopolitical issues as an opportunity. Last year, the corresponding figures were 57% and 17%. Currently, 31% of advisers still see the (complex) regulatory landscape as a challenge; 54% as an opportunity. In 2017, the corresponding figures were 45% and 42%.

The change in attitude is even more dramatic in relation to regulators' introduction of commission caps and requirements for greater disclosure. Last year, 26% of advisers saw these as being negative, in that they would necessitate a change in the advisory firm's business model. This year, only 7% of advisers are so pessimistic. Meanwhile, the number of advisers who see commission caps and greater disclosure as being positive (because they enhance the industry's image) increased from 42% to 55%.

For the advisers as a group, revenues are improving. In 2018, 33% say that revenues in their business have risen over the preceding 12 months thanks to both increased numbers of clients and increased assets under management (AUM) of (or transactions for) clients. In 2017, the corresponding figure was 22%. Not all advisers are benefiting, though. Of those who are still in business, 13% have suffered a reduction in business thanks to a decrease in the number of clients and lower AUM. Last year, none of the advisers interviewed reported that their business had shrunk because of both of these problems.

Further, costs are falling for many. Numbers reporting higher compliance/administration costs have dropped from 72% to 50%. There have been jumps in the numbers of advisers reporting lower wage and salary costs (from 3% to 14%), lower rents (from 13% to 36%) and lower telecommunications/entertaining/other expenses (from 9% to 36%). Some 71% of advisers – or about the same number as last year – report that regulatory costs have increased over the preceding 12 months.

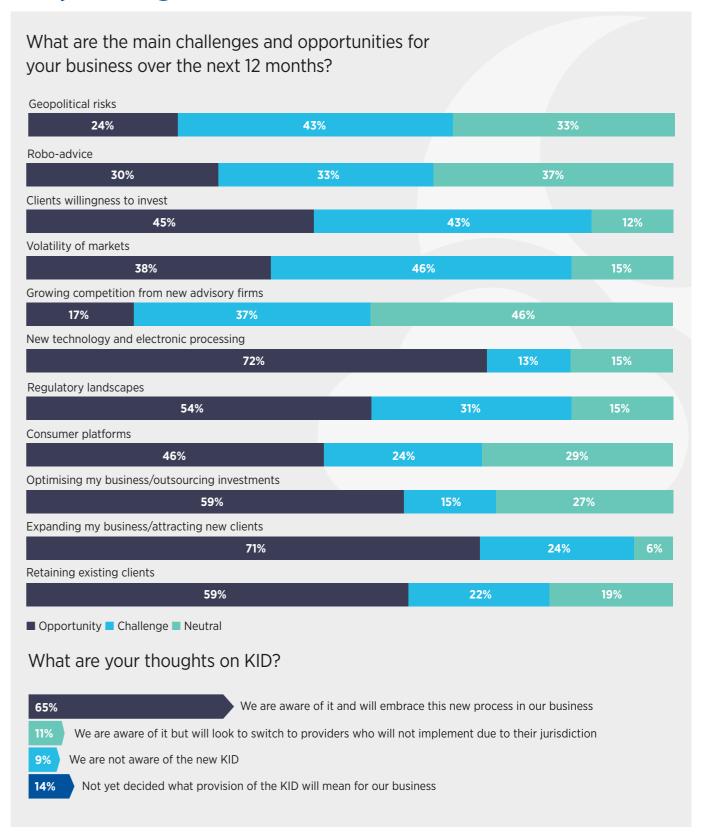
For a long time, the advisers have recognised that their clients – the expats – are becoming more demanding and knowledgeable. Over the last year, the number of advisers who say that their clients are demanding greater online access has jumped from 36% to 51%. Meanwhile, the number of advisers whose clients are generally demanding better value has risen from 49% to 62%.

The needs and expectations of clients have had an impact on the usage of particular products by the advisers. Relative to late 2017, the number of advisers who reduced their usage of DFM services over the preceding 12 months fell from 19% to 8%. Numbers who have increased their usage of real estate investment trusts (REITs) dropped from 29% to 10%. Conversely, the number of advisers who have increased their use of protection products offered by the life companies has grown from 58% to 76%: meanwhile, the number who have boosted their use of the life companies' savings products has jumped from 34% to 59%.

Perhaps most importantly, business models have changed. Across all advisers, the split between initial fees/commissions and recurring fees/commissions has shifted from 72%/28% to 61%/39%.

Some 71% of advisers – about the same number as last year – report that regulatory costs have increased over the preceding 12 months.

And, Looking Forward...





Thought Leadership Article Insight Discovery Regulatory Update

Unsurprisingly, the pace of regulatory change in the UAE has continued at speed over the course of 2018 and it is unlikely to slow down any time soon for firms operating in the life insurance and investment and savings market. Luckily for firms, the overhaul of existing rules and the introduction of new regulation is beginning to bring some welcomed clarity to an otherwise fragmented and often confusing regulatory landscape.

Collaboration takes centre stage

Back in January 2017, the Securities and Commodities Authority (the "SCA") issued Decision No. 3 of 2017 concerning the Regulation of Promotion and Introduction Activities (the "PIR") which seeks to regulate the marketing, distribution, announcement, publication or dissemination of data, information or advertising materials related to financial products, by any means.

At the time of publication, much of the legal commentary focused on the PIR representing the next stage in the development of the UAE "onshore" financial regulatory regime which applies in the UAE outside the two financial free zones; the Dubai International Financial Centre ("DIFC") and the Abu Dhabi Global Market ("ADGM"). Legal analysis focused on how the introduction of the PIR by the SCA sought to remove uncertainty around the offshore promotion of financial products and services onshore in the UAE, where the relevant products or services did not fall under a regulatory regime covered by either the UAE Central Bank Law or SCA; ultimately appearing to remove some of the exemptions that had previously been relied upon by foreign promoters as part of what was known as "tolerated practice".

As the dust settled, and the implications of a multi-factored licensing regime began to sink in, regulators from each of the financial free zones began lobbying the SCA to reach a joint agreement to facilitate the licensing of domestic funds by each regulator for promotion across the UAE.

On 27 November 2018, the regulators: the SCA; the Dubai Financial Services Authority ("DFSA") of the DIFC; and the Financial Services Regulatory Authority ("FSRA") of the ADGM, announced they had reached an agreement to implement a passporting regime across each of the three jurisdictions which will rely on mutual recognition as a regulatory mechanism for the promotion and supervision of investment funds throughout the UAE.

The agreement seeks to facilitate the licensing and promotion of investment funds to attract foreign investment. It will also pave the way for savings to be directed towards new financial instruments such as investment funds and activate a number of financial services and activities related to investment funds such as custodian, investment management and promoting.

Further details on what the common legislative framework in each of the respective jurisdictions will actually look like is yet to be issued, but the announcement confirms that agreement has been reached for a notification and registration facility to be established by each regulator to facilitate the promotion and sale of domestic funds set up within the UAE, outside the financial free zones, or in either of the DIFC or ADGM, to potential investors situated anywhere in the UAE under a single licence.

This is a big step towards unifying an otherwise confusing and fragmented promotions regime and this agreement is likely to foster an enhanced exchange of regulatory information amongst the regulatory bodies in relation to the promotion and sale of local investment fund units in the UAE.

If there was ever any doubt remaining from 2017, this announcement further reinforces the SCA's role as primary onshore regulator over the Central Bank for the supervision of capital markets operating in the UAE, with the exception of the financial free zones. The DFSA and FSRA will shortly commence consultation on the proposed passporting regime.

The wait continues for the much anticipated Life Insurance Regulations

Following the Insurance Authority's (the "IA") release of Circular No (12) of 2017 draft regarding Life Insurance and Family Takaful Business in the UAE in April 2017, the industry continues to wait for the much anticipated publication of the final Life Insurance Regulations. Previous, and somewhat optimistic, estimates believed that the IA would publish the final regulations in the first quarter of 2018, but with that timeframe long-gone, speculation continues as to the extent of the changes required to the regulations following the end of the consultation in May 2017 and the timeframe for when we can expect publication of the final text.

In their current state, the draft regulations would have far reaching implications on the way UAE insurance brokers are governed, seeking to impose maximum limits on the indemnity commission advisers can earn; dramatically restricting the way an adviser can recoup fees from the investment or insurance products they sell, which currently gives them an incentive to recommend those paying the highest fees.

With little information coming out of the IA on their expected publication date, firms are advised to continue to keep their eyes peeled for an announcement - which may or may not be - any time soon.

The Netting Law provides for the recognition of netting agreements, close out netting provisions and related collateral arrangements, particularly in insolvency scenarios. Based on the

The Central Bank recasts the licensing framework for financial services

In November 2018, the UAE issued the Decree of Federal Law No. (14) of 2018 (the "new Central Bank Law") which effectively repeals and replaces the old 1980 Central Bank Law which defined the licensing and regulatory framework for financial services across the UAE.

In line with international best practices and standards, the new Central Bank Law adopts a system of licensing classification based on a list of financial service activities rather than by entity type, which was deemed no longer adequate for the increasingly sophisticated financial market in the UAE. The new licensing categories include accepting deposits. providing credit, currency exchange, payment services, virtual banking and promoting financial activities. The approach now mandated by the new Central Bank Law more closely mirrors the licensing classifications regime applied by the DFSA and FSRA.

In addition to the changes made to the licensing categorisations, the new Central Bank Law entrusts authority to the UAE Central Bank to carry out prudential supervision over the financial services industry, and establishes a Higher Shari'a Board to have oversight of Islamic financial institutions and activities in the UAE.

These changes come around the same time as other wide-reaching developments for the financial services market, including the introduction of the UAE's new netting law (Federal Law No. 10 of 2018) (the "Netting Law"), thereby demonstrating the UAE government's commitment to provide financial institutions with greater clarity and certainty in doing business in the country.

The Netting Law provides for the recognition of netting agreements, in insolvency scenarios. Based on the ISDA Model Netting law (with some notable amendments), the Netting Law provides clarity and recognition for the scope of qualified financial contracts to be treated as valid and enforceable, where previously this may not have been the case. Of note, the Netting Law stipulates that a committee shall be formed by the UAE Ministry of Finance comprising representatives from the UAE Central Bank, the SCA and the IA. with the authority to vary the scope of qualified financial contracts covered by the Netting Law. Once again, recognition of international banking concepts in the UAE moves the country one step closer to matching the body of regulations applied globally.

Innovation is on the SCA's agenda

In September 2018, the SCA passed Board of Directors' resolution no. 28/R.M of 2018 adopting the FinTech Regulatory Sandbox Guidelines signalling a clear indication to the market that innovation is at the forefront of its agenda. Forming part of the UAE's National Innovation Strategy, the SCA regulatory sandbox paves the way for FinTechs to live test their products and services under a light-touch regulatory environment.

Following the lead of regulators from around the world, the regulatory sandbox will allow the SCA to safeguard the rights of both consumers and investors, whilst allowing it to have a front row seat to watch as FinTech propositions develop in a controlled environment.

Introduction of the SCA's onshore regulatory sandbox mirrors those sandboxes currently employed by the DIFC in its FinTech Hive, and in the ADGM, and is likely to play an increasingly important role in encouraging FinTechs to use the UAE as a base in the region to develop new products and services.

For further information on any of the above updates, please do not hesitate to contact a member of the Pinsent Masons Middle East Financial Regulation team.

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What Hasn't Changed (Much)?

Advisers still fret about competition from new advisers/wealth managers

As has been in the case in earlier editions of MEIP, the advisers are also defined by aspects that have not changed much over the preceding 12 months. For instance:

Growing competition from new financial advisory firms and wealth managers remains a key challenge. That is the view of 37% of advisers (versus 34% in 2017). Only 17% of advisers see growing competition as an opportunity (versus 21%).

Opinions remain divided about clients' willingness to invest – which had been an existential threat back in 2016. Some 43% of advisers still see the lack of willingness as a challenge (versus 41%). Conversely, some 45% of advisers see clients' willingness as an opportunity (versus 50%).

The number of advisers who have no view on whether robo-advice is an opportunity or a threat remains unchanged at about 37%. The number that see it as a challenge has risen slightly – from 25% to 33%. Conversely, the number that see robo-advice as an opportunity has dropped from 38% to 30%.

The volatility of financial markets remains a challenge for 46% of advisers (up from 43%). The number of advisers that see volatility as an opportunity has slipped marginally, from 39% to 38%.

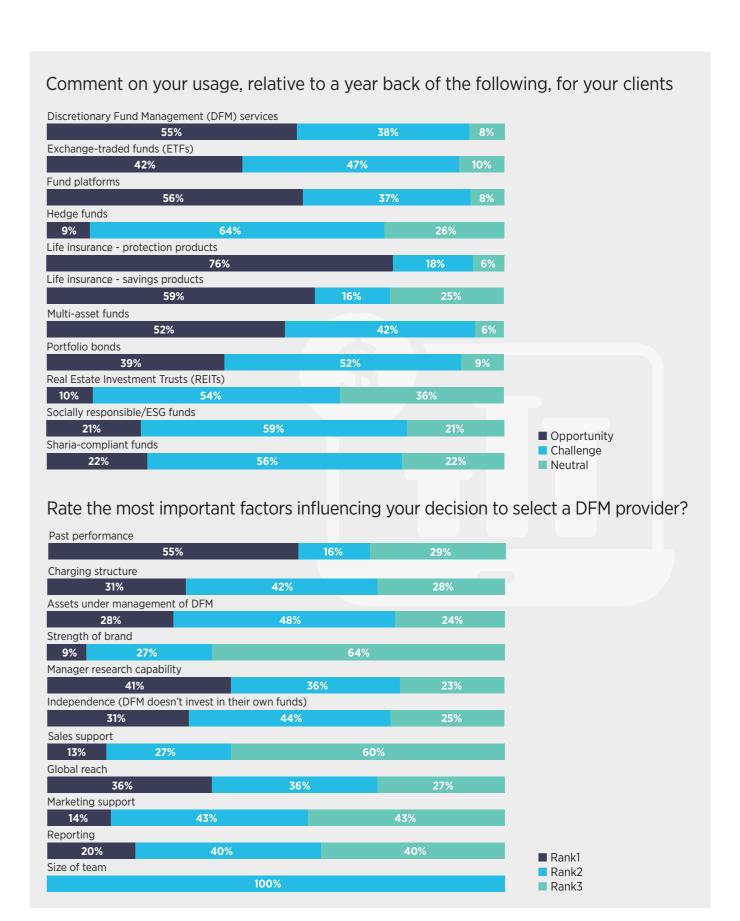
The advisers are overwhelmingly bullish about technology and electronic processing. The number that see it as an opportunity has risen from 66% last year to 72% this year. Pessimists, who see technology and electronic processing as a threat, have fallen in number from 16% to 13%.

The growing knowledge and sophistication of expats continues to be reflected in the advisers' usage of products. Some 55% of advisers have increased their usage of DFM services over the last 12 months (versus 54% in 2017). The number of advisers actually using DFM services has increased slightly, from 57% to 59%.

Some 42% have increased their usage of exchange traded funds (versus 44%). The number of advisers who have increased their usage of fund platforms has risen from 47% to 56%. For multiasset funds, the corresponding figures are 46% and 52%; for portfolio bonds, 42% and 39%.

Of course, advisers and senior managers within advisory groups continue to think about regulation. Sometimes, though, very widely discussed changes have little impact on day-to-day operations. An example, as indicated in the infographic below, are the regulations governing Key Information Documents (KIDs) for UCITS funds.

Asset allocation trends, attitudes towards international life companies and (social) media have also remained broadly unchanged over the last year or so. These are all discussed separately in this report.





Thought Leadership Article

Saving time and money – outsourcing investments

Paul Evans from Old Mutual International discusses how centralising and outsourcing your investment proposition can help you save time and money.

Making the right investment choices for an investment portfolio and ensuring it is efficiently diversified so it helps meet a client's long-term investment objectives, takes time, knowledge, and skill.

This is why outsourcing fund selection and portfolio management can be an attractive option, especially in today's increasingly regulated environment. Outsourcing can give you and your clients the reassurance that their investments are being managed by experts who can help achieve their investment goals. It will also enable you to add value by focusing on your clients' holistic financial planning needs.

In this article, I'll focus on types of outsourcing and the benefits.

Which type of outsourcing is suitable for your client?

The type of outsourcing suitable for your client will depend on a number of factors, such as their investment needs, objectives, the amount they wish to invest, as well as their investment knowledge and level of risk.



Before making any recommendations, all the aspects of outsourcing must be considered to help understand which type of arrangement is suitable for your client. For example, if your client wants a diversified investment but through a simple solution rather than a complex portfolio, they may be more interested in a multi-asset fund.

However, if they want a highly personalised bespoke portfolio of assets, outsourcing the investment management fully to a third party may be a more suitable option. These clients are often looking to invest a large amount of money and are looking for a holistic service covering multiple investment products.

Simple and effective options from fund management companies

there are many ways to outsource investment management, but one of the simplest and most effective ways could be using multi-asset funds. These funds offer the knowledge and expertise of the fund manager in selecting appropriate investments in each asset class, sector, and region, with the aim of reducing risk and offering a diversified portfolio.

Multi-asset funds can combine strategic investment decisions with nimble tactical adjustments from time to time to cater for market events, helping to ensure the fund is meeting its overall objectives.

There are many multi-asset funds available in the market to choose from. Broadly speaking, to gain the exposure required by the portfolio manager, the funds can be split between those that invest directly in individual securities and those that use a range of collective funds.

Outsourcing can give you and your clients the reassurance that their investments are being managed by experts who can help achieve their investment goals. It will also enable you to add value by focusing on your clients' holistic financial planning needs.



However, there are a multitude of blends of the two styles. What is important is that the multi-asset fund used fits with your client's needs and expectations.

Highly bespoke discretionary services

alternatively, if multi-asset funds are not suitable for your clients, you may consider outsourcing all investment management to a third party - often referred to as discretionary investment or asset management companies. This allows you to utilise their expertise and reduce the amount of time you spend on selecting and monitoring appropriate assets.

Outsourcing also moves some of the regulatory responsibility associated with investment management to a third party, reducing the burden falling directly on you. This approach allows you to act as an advocate for your clients, leaving the investment management, portfolio building, and reporting, to your chosen provider. This may be an especially attractive alternative for clients with large existing holdings that they wish to retain and who are looking for a more bespoke investment solution with regular meetings with the portfolio manager.

What are the benefits of outsourcing?

the benefits of outsourcing are firstly peace of mind as investments are managed by experts using tested and proven investment processes, with access to leading investment resources and research. Secondly, advisers and investors can leave the day-to-day management of the investment to the experts, knowing that the client's needs are being met with precision.

And finally, another benefit is a reduced compliance and monitoring burden. By outsourcing your investment management, you can help reduce your business risk associated with managing money and making investment decisions.



Focal Point: DFM Services And Asset Allocation

Once again, the advisers want more DFM, more ETFs and more multi-asset strategies

Over the last few years, the advisers have generally increased their usage of ETFs and multi-asset strategies in responses to demands from increasingly sophisticated and value-conscious expat clients. This remains the case in late 2018.

Some 53% of advisers are looking to increase their clients' allocations to ETFs over the coming year, while only 11% are looking to reduce allocations. For multi-asset strategies, the numbers are 54% and 3%.

Other asset classes where advisers who are looking to increase allocations are vastly more numerous than those who are looking to trim allocations include: global developed markets equities (53% versus 8%); global developed markets fixed income (40% versus 5%); global emerging markets equities (43% versus 6%); and global emerging markets fixed income (43% versus 7%).

As ever, there are a number of asset classes where significant numbers of advisers are looking to trim clients' allocations. This is most obviously the case for real estate, where the number of advisers who are looking to reduce allocations (32%) is four times the number that are looking to increase allocations (8%). Other asset classes where advisers who are cutting allocations outnumber those who are lifting allocations include: Shariacompliant equities (17% versus 15%); Sukuks (20% versus 17%): GCC regional equities (20% versus 13%) and hedge funds (21% versus 15%).

Demand for DFM services continues to grow. Some 49% of advisers are looking to increase usage over the coming year, while only 9% are looking to reduce usage.

DFM providers are selected on the basis of a number of criteria. At least 70% of advisers rate each of the following in their top two selection criteria: investment performance; charging structure; size of the DFM services provider in terms of AUM; capacity of the provider to research underlying managers; independence (in the sense that the provider does not choose/use its own products, and; global reach. Less important criteria include brand strength, sales/marketing support and size of investment team of the provider.



Some 53% of advisers are looking to increase their clients' allocations to ETFs over the coming year, while only 11% are looking to reduce allocations.

Focal Point: International Life Companies

Wanted: easier administration and greater disclosure of fees and costs – and the right regulator...

The savings and protection solutions of international life companies remain popular, and are used by 85% of advisers.

Improved administration by the life companies remains a top priority for 66% of advisers, and is the second ranked priority for another 13%. Detailed disclosure of fees and charges is a top priority for 61% of advisers. Post-sales digital processing is also important. (Far) less priority is given to factors such as technical support, social media training, product training, and sales skills training.

As in previous MEIP reports, the advisers were asked to rate particular international life companies on the basis of a number of criteria. Once again, Zurich International

Life is the international life company which, across all advisers, is most favoured overall. However, there are very significant differences between advisory groups.

One firm – 11 of whose advisers were interviewed for the survey – favoured Old Mutual International. In this instance, both the advisory firm and the life company are regulated by the UAE's Securities & Commodities Authority (SCA).

By contrast, another firm – with more than 100 advisers interviewed – favoured Zurich International Life. In this instance, the advisory firm and the life company are overseen by the Insurance Authority (IA). In short, it is fair to say that the choice of international life company by an adviser or advisory group is very often dependent on the life company having the same regulator.

Nevertheless, it is possible to identify a significant number of situations where insurance brokers who are overseen by the SCA recommend products that are offered by life companies who are regulated by the IA. A possible explanation for this is that both parties have signed distribution agreements which, in their view, are acceptable to both regulators.

Isle of Man's Conduct of Business CodeAlso emphasising quality over quantity...

Many of the Isle of Man Life Insurance Companies have either a branch or subsidiary within the UAE; mainly licenced either by the Insurance Authority or the Dubai Financial Services Authority. These company's principal regulator is the Isle of Man Financial Services Authority who have, after due consultation with the industry, issued a new set of rules that came in to effect on 1st January 2019 under the Isle of Man Insurance (Conduct of Business) (Long Term Business) Code.

The Code is in response to the continued need for improved standards within the global financial service industry as sponsored by the IAIS (International Association of Insurance Supervisors), including knowing your distributors, transparency, and suitable products for clients. At a high level the Code covers the following from 1st January 2019:

 Distributors of the Insurance Company Products must have all the appropriate licences, authorisations and registrations to conduct business in the countries they are advising clients.

- New requirements are being introduced for illustrations, valuations and inducements.
- Customers must be treated fairly throughout the Insurance Company policies and processes, including ensuring the policies they are sold are suitable. A specific introduction will be a 30-day cooling off period for new business and top-ups.
- From 1st July in addition customers need to be provided a Key Information Document which describes the main features of the product, as well as risk ratings, commission paid to the distributor, surrender process and complaint procedure.

The life companies have worked hard to ensure they comply with the new regulations having to change many of their procedures and systems. They have also spent time working alongside the distributors helping their understanding of

the impacts on them and their customers. Many distributors who have worked in the more mature markets around the world will have seen similar regulation introduced and will realise these changes are for good reason and if embraced will lead to better quality sales, increased persistency, less complaints and an enhanced reputation in the community.

So what is the impact on the UAE insurance market? The Isle of Man Financial Services Authority have acknowledged that parts of the world already have regulation similar to that they are implementing so have exempt countries such as Singapore, Hong Kong and the European Union. They believe the UAE will be implementing similar regulation and so it too is exempt for regulated brokers only. This should give the UAE financial services market a good indication where the authorities will pitch their new regulation in the near future.

Bob Pain CEO, AILO



Thought Leadership Article

What should GCC asset managers do to attract and retain assets?

Asset managers in the Gulf Corporation Council (GCC) region need to adopt a radical approach to survive and thrive. Interestingly, the regional fund houses are struggling to attract assets despite the GCC being awash with capital.

Mutual fund AUM remains low, at just 1.7% of GDP compared with the global equivalent value of 15.3%, despite the abundant private wealth and liquidity.

Asset gathering challenges

Equity mutual funds, the primary vehicle in the GCC for asset gathering, were hit hard by the global financial crisis of 2008, which led most investors to pull their money out; the industry has not recovered since.

There are other structural reasons behind the difficulties in acquiring assets in a region with a liquidity surplus. Local investors, many of whom have their own private family businesses, have invested their surplus in overseas markets that have performed exceptionally well since 2009, like the U.S. In contrast, GCC stock markets have underperformed, creating a negative cycle with fewer institutional participants, in turn leading to lower market liquidity, which discourages other investors from GCC-focused equity funds.

When it comes to other products, bond funds are relatively new in the GCC and, since the regional debt markets have only recently seen reforms, their size is also very small. Real estate funds, a popular choice among many GCC investors, have seen negative returns since 2015, so have been unable to increase their AUM. Other asset classes, like private equity, for example, have suffered because of corporate governance issues, a lack of transparency, poor exit track records and the paucity of information.

Private wealth managers struggling

Private wealth management has also found it difficult to gain traction in the GCC as banks focus more on selling products than offering solutions.

This might seem surprising, given that total investable and liquid assets in the GCC region are expected to exceed USD 3 trillion by 2021, according to a report by the Boston Consulting Group. The percentage of households classified as 'affluent', with investable assets between USD 250,000 and USD 1 million has been increasing faster than the HNW and UHNW segments.

Yet, players in the GCC have not been able to tap into this opportunity. Clients may be more sophisticated and typically more engaged with their investments, but they still need investment advisers to explain financial matters to them.

GCC funds have also been unable to offer products that are tailored to individual client needs. For example, female investors are growing in importance across all segments and have different investing styles than their male counterparts. However, they are offered the same 'plain vanilla' options and there is no specific proposition that caters to their needs. The fees charged by private wealth managers also tend to be very high, with investors paying as much as 3.0% to 7.5% of their assets in fees every year - although this is also the case globally.

Challenges for mutual funds in the GCC $\,$

Mutual funds also face difficulties in marketing and distribution to GCC nationals who are primarily reached through banks.

Asset management companies (AMCs) often enjoy exclusive access to their parent bank's distribution network. As a result, it is difficult for an AMC to compete if it does not have a network of bank branches. The outcome is a limited number of AMCs dominating the asset management industry, leading to fewer options for investors.

Overcoming the challenges

Clients of AMCs in the GCC generally comprise HNW clients as well as institutional investors like sovereign wealth funds (SWFs), pension funds and insurance companies. Highly-skilled expats in the GCC could also be a viable customer base; AMCs in the GCC could collaborate with fund houses in the expats' home market to launch more bespoke products.

The pitfalls of the current product structure is that it is skewed towards money market/trade finance funds, followed by equities, whereas asset classes like real estate, bonds and commodities have negligible market shares. While clients look for consistently good-performing funds, they are veering more towards wealth management than fund solutions.

The former focuses more on asset allocation and uses (preferably low-cost) funds to execute it. Wealth management also addresses other client needs like trust services and online portfolio tools, to become more "solutions" based.

Banks, quick to realize this potential, are moving towards elevating their private banking offering to more of a "wealth management" business. AMCs will then be able to increase their AUM and client base.

The GCC asset management industry also needs to evolve. Despite Baby Boomers (born between 1945 and 1960) and Gen-X (born between 1961 and 1980) accounting for a higher proportion of the wealthy, fund houses must increasingly focus on the growing Gen-Z population (born after 1995). Products must be tailored towards this more tech savvy, flexible, risk-taking and social media-friendly demographic. The use of technology in areas like customer profiling, portfolio options, product evaluation and performance reporting will be beneficial in this regard.

Mutual funds should also target segments with strong growth prospects like Sharia-compliant investments. Even though Muslims comprise nearly 25% of the world's population, less than 1% of financial assets are Sharia compliant. One of the areas of potential growth is in pension funds, which represent less than 1% of global Islamic funds. Considering the size of government pension funds in the GCC is USD 438 billion, even a 10% market share would be significant for the Islamic fund Industry as a whole. These funds can also be marketed easily to both GCC and foreign nationals who are Muslim.

In a similar way as the opening up of the GCC real estate sector led to the participation of institutional players like REITs, pension funds and insurance companies, the equity markets can also benefit from more institutional players. GCC-based pension funds can be mandated by regulation to invest in local equity markets, which will increase stock market liquidity and institutional participation, ultimately leading to increased AUM for AMCs. GCC-based pension funds can make also use of securities lending to increase their returns as short selling has been introduced to GCC stock markets. Encouraging family-owned, private companies to list on local stock exchanges can provide further options for fund managers plus increase liquidity in markets.

Private equity (PE) funds can benefit from the ongoing economic reforms in the region as it diversifies away from oil. Innovation centres like the UAE's "AI smart lab", for example, provides opportunities for start-ups to flourish and, in turn, PE funds to invest in them in the search for returns. Continuing with reforms will also increase foreign fund inflows, helping to improve liquidity in equity markets, so allowing profitable exits for PE ventures. Further, changes in the regulatory framework for privatelyheld companies can solve corporate governance issues that hamper PE.

Finally, asset managers in the GCC need to offer a wider variety of financial products to cater to both GCC nationals and expatriate workers who come from all over the world. Creating such products and marketing them to people with different risk profiles would be both a challenge and an opportunity for GCC AMCs.

MR Raghu is managing director of Marmore Mena Intelligence, a research house focused on conducting Menaspecific business, economic and capital market research. We welcome questions from our readers through email at research@e-marmore.com, or via twitter@marmoremena



When it comes to other products, bond funds are relatively new in the GCC and, since the regional debt markets have only recently seen reforms, their size is also very small.

Focal Point: (Social) Media

Some, but only some, international asset managers will be able to reach advisers through (social) media

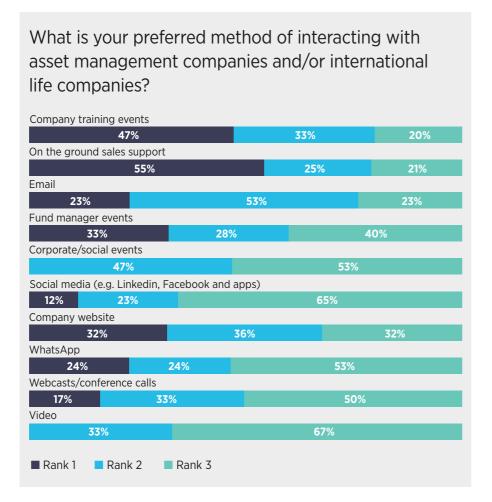
The complexity of international life companies' offerings, and the advisers' need for help with administration, mean that the international life companies who are looking to do business with the advisers need to have a physical presence in the GCC region – and most likely in the UAE. Past MEIP reports have found that an on-the-ground presence is less important for asset management companies: in many cases, they can serve the advisers with staff based in London (or elsewhere) on a fly-in-fly-out basis.

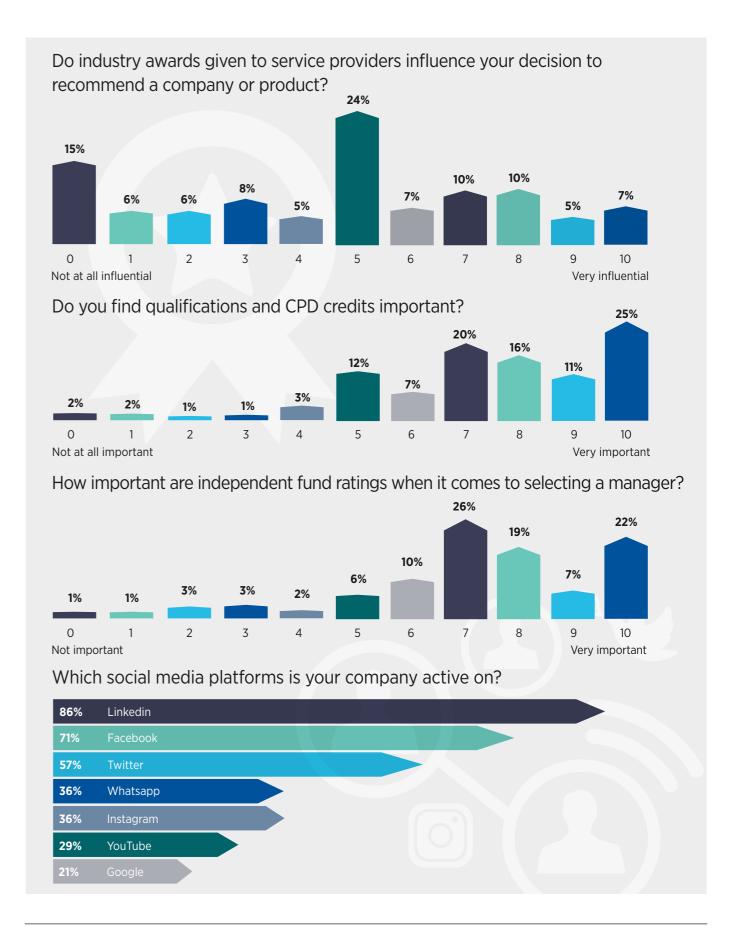
Bearing in mind the various ways in which advisers can interact with international life companies and asset managers, on-the-ground sales support is a top priority for 55% of advisers. Marginally fewer – 47% – identify company training events as a top priority. At the other extreme, corporate social events, videos and webcasts/conference calls are a top priority for almost virtually none. Information events and e-mails from asset managers are a top priority for 23%-33% of advisers. Social media and other apps, by contrast, are important for very few.

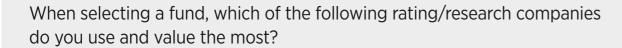
Advisers value continuing professional development (CPD) points that can be earned from their attendance at events that are sponsored by asset managers or international life companies. Some 53% say that CPD points are (very) important and only 5% say that CPD points are unimportant. Conversely, the number of advisers who think that industry awards for providers or products are important – 21% – is virtually the same as the number who place (almost) no importance on industry awards.

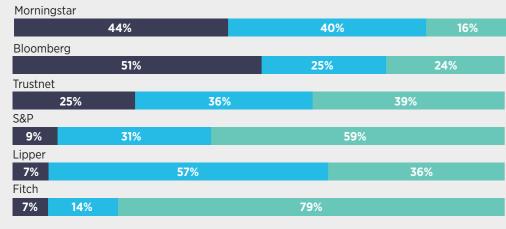
As was the case in previous years, the advisers gain news about their industry from a broad variety of media sources.

Because of the complexity of the needs of expat clients, social media is not important to advisers who are looking to communicate with their clients. The few advisers who commented on why they use social media indicated that brand development for their own company was the main reason.



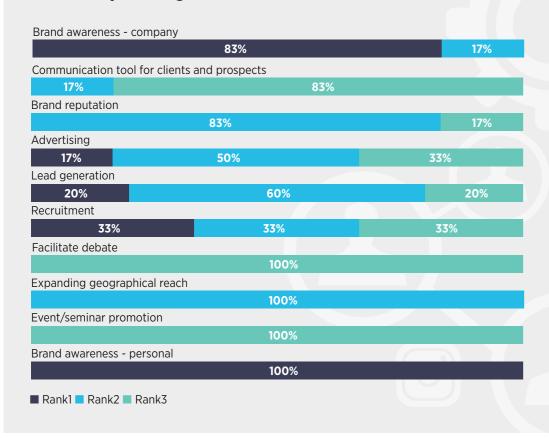


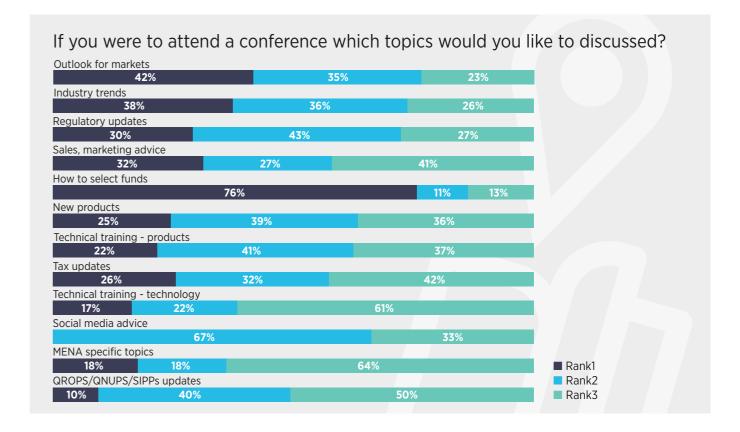




■ Rank1 ■ Rank2 ■ Rank3

What are you using social media for?





Afterword

The rise of wealth managers...

As quality has trumped quantity, we have heard time and time again that wealth managers have been benefiting at the expense of other advisers. The data that is included in the Foreword supports this observation.

To date, though, there has not been a standard definition of what, exactly, is a wealth manager. We think that such a firm has the following characteristics:

- It is almost always independent of a bank or other large financial institution.
- Client portfolios handled are typically between US\$500,000 and US\$1,000,000 in size.

- The firm emphasises Open Architecture, in that it uses funds and insurance products that are sourced from a number of unrelated asset management companies and international life companies: the firm is not a significant 'manufacturer' of its own funds or insurance products.
- The firm provides Discretionary Fund Management (DFM) services.
- The firm may also provide brokerage and custody services.

For asset managers, international life companies and other stakeholders who are involved with the provision of savings solutions to expats in the GCC countries, a key question through 2019 will be: how are the wealth managers faring?

Some insights will come from Insight Discovery's new www. whichfinancialadviser.com service. However, further research into the activities of the wealth managers will be essential. Writing in February 2019, we confidently predict that the rise of the wealth managers will continue.

As was the case in 2018, the fortunes over the coming year of the advisers and the wealth managers will tell much about what is really happening in the economies of the GCC countries, and not just in their financial sectors.

Andrew Hutchings Research Director Insight Discovery Limited

Platinum Partner Profiles



About Financial Risk Solutions Ltd (FRS)

Founded in 1999 by actuaries and IT specialists and now part of Constellation Software Inc. Financial Risk Solutions Ltd (FRS) is a premier provider of unit linked investment administration and fund accounting software specifically designed for the life and pensions industries.

FRS offer a proven range of modular, intuitive technology solutions which allow firms to pro-actively monitor and administer investments as well as mitigate risk by continually monitoring breaches and exceptions to critical investment processes

Invest|Pro™ securely automates multiple complex fund administration processes within a single application. Invest|Pro™ unit-pricing and investment administration software is scalable, modular and flexible.

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Morningstar, Inc. is a leading provider of independent investment research in North America, Europe, Australia, and Asia. The company offers an extensive line of products and services for individual investors, financial advisors, asset managers, retirement plan providers and sponsors, and institutional investors in the private capital markets. Morningstar provides data and research insights on a wide range of investment offerings, including managed investment products, publicly listed companies, private capital markets, and real-time global market data. Morningstar also offers investment management services through its investment advisory subsidiaries, with more than \$203 billion in assets under advisement and management as of June 30, 2018. The company has operations in 27 countries



About Old Mutual International Forward thinking advisers benefit from technology

Old Mutual International is a leading crossborder provider of wealth management solutions. Our aim is to help you manage and grow your clients' investments; not just for their own future, but for their family and the generations to come.

We are one of the few financial service providers to operate in multiple global markets, offering effective financial planning solutions to expatriates and local investors across the world including Africa, Asia, Europe, Latin America, and the Middle East.

In an ever-changing regulatory landscape, it's crucial that financial advisers stay ahead of the game. We are here to give you all the support and technical expertise you need to help you maximise opportunities for your clients.

Old Mutual International is part of Quilter plc, a leading provider of advice, investments and wealth management both in the UK and internationally, managing US\$154 billion of investments on behalf of over 900,000 customers (as at 30 September 2018*). Quilter plc is our group holding company and it listed on the London and Johannesburg stock exchanges on 25 June 2018.

To find out more about Quilter, including shareholder information, corporate news, reports and governance, as well as information on our approach to responsible business, please visit our group website, www.quilter.com.

*Exchange rate sourced from the Bank of England. 1 GBP = 1.304 USD as at 28 September 2018.

About Us



Insight Discovery is a multiple award winning consultancy that specialises in market intelligence and strategic communications. We provide solutions and support to major conglomerates, government agencies and many of the world's largest and best known financial institutions in all of these areas.

For five years running, Insight Discovery was voted 'Best Consultancy Firm In The Middle East' by Global Investor, part of Euromoney. Our proven success shows we're outstanding at what we do.

We focus on:

- Emerging markets such as the Middle East, Asia, LATAM and Africa
- The financial services sector, although our clients now span other sectors

Insight Discovery has designed a new website to help UAE residents find a regulated financial advisory firm and a qualified financial adviser. www.whichfinancialadviser.com is a service that consolidates information of those providing financial advice in the UAE in one convenient place which is unique to this market.



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