



Alter Domus

MALTA NEWSLETTER

MAY 2020



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Alter Domus

MALTA NEWSLETTER

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Dear Friends,

I hope you are doing fine in these unprecedented times.

As we have communicated earlier in mid-March, we were able to have all of our 160 staff working safely and efficiently from home. This was done relatively quickly with minimal disruptions and inconvenience to our clients.

At the time of writing this newsletter, there is no clear timeframe as to when people will be able to work safely from our office. That being said, the infection rate in Malta has been limited and continues to decrease so we are hopeful that operating from the office may be in the not too distant future.

Notwithstanding this unpleasant environment, the first three months of the year were crucial to the continuing development of our local business by expanding our talent base and recruiting specialists in various areas of our business. More information can be found in the newsletter.

Due to the uncertainty surrounding the pandemic, clients' needs for investor reporting and regulatory have increased. We have been very active in providing them with additional support during this period.



Chris Casapinta
Country Executive, Malta

MALTA'S REGULATORY & COMPLIANCE UPDATES

MFSA UPDATES

The regulatory and compliance framework is constantly developing and requires constant monitoring for companies to remain abreast of all the changes taking place. Locally the regulators are geared towards raising compliance and supervisory standards across the board enabled by a more data-driven and risk-based supervisory framework.

MFSA's Supervisory and Enforcement Effectiveness Dashboard

A new Supervisory and Enforcement dashboard published by the MFSA highlights the key performance indicators with respect to regulatory oversight and enforcement effectiveness, focusing on the MFSA's key supervisory priorities for the next three years with a commitment to deliver a more agile, dynamic and safe environment for the benefit of both consumers and regulated firms in line with its strategic objectives and also the commitments made with international institutions in addressing key recommendations. The dashboard is a summary of a much wider supervisory engagement programme which dovetails into a number of projects and reform initiatives all targeted towards enhanced efficacy.

MFSA Organisational Changes

The MFSA has been strengthening its organisational capacity by creating new operational and supervisory functions that include risk management, supervisory ICT and cybersecurity risk, financial crime compliance, data management & business intelligence, FinTech, and programme management. This process also entailed engaging new professionals to join the MFSA leadership team in order to focus on the delivery and implementation of the MFSA's Vision 2021 and Strategic Plan published in 2019.

A new Due Diligence function is being set up to centralise and focus solely on probity, intelligence gathering, due-diligence and ongoing monitoring of fit and properness of individuals and their involvements while operating in the financial services sector. The licensing and authorisation process within the Authority is being merged into the respective supervisory functions so as to ensure a more streamlined and efficient approach throughout the lifecycle of each entity falling within the oversight of the MFSA. Moreover, the MFSA will be publishing a service level charter by the end of Q1 2020, outlining target timeframes and procedures for each licensing and authorisation application.

Increased Regulatory Oversight over Trusts and Trustees

The MFSA has introduced new regulatory obligations for trusts, thereby introducing more scrutiny and accountability and transposing the Directive (EU) 2018/843 of the European Parliament and of the Council of 30 May 2018 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing (5th AMLD) in so far as these provisions relate to the register of beneficial owners of trusts. The main amendments introduced to the Trusts and Trustees Act (Register of Beneficial Owners) Regulations are the following:

- Trustees are required to submit to the MFSA a declaration of beneficial ownership with respect to every trust under their administration through the online portal for the Trusts Ultimate Beneficial Ownership Register. This requirement applies irrespective of whether the trust generates tax consequences or otherwise. Annually they should also submit a declaration confirming that there have been no changes to the beneficial ownership of the trust in the previous calendar year other than any changes notified;
- A six months period from the coming into force of the amending regulations is being granted to trustees of trusts set up prior to their coming into force to submit the beneficial ownership declaration with respect to such trusts;
- These reporting requirements also apply to any trustee of a trust whose place of establishment or residence is outside the European Union if such trustee enters into a business relationship or acquires real estate in Malta, in its capacity as trustee of a trust; and
- Access to the beneficial ownership register has been extended to: (i) any person who, upon a written request, can demonstrate a legitimate interest; and (ii) any person who submits a written request to the MFSA in relation to a trust which holds a controlling interest in any corporate or other legal entity through direct or indirect ownership, or through control by other means.

Contingency Planning in light of COVID-19

The MFSA has issued a Circular on Contingency Planning, whereby it expects licensed holders to have business continuity and contingency plans in place to deal with major events such as COVID-19 so as to ensure the continuity of business and shall define the advance planning and preparations required to minimise loss and guarantee continuity of the fundamental business functions of the licence holder.

MALTA'S REGULATORY & COMPLIANCE UPDATES

FIAU UPDATES

Increase in Human Resources, Reorganisation and Restructuring

The FIAU is in the process of undergoing re-organisational changes and a restructuring process. There is a four year plan for human resources to be increased.

The structural changes in the Intelligence and Analysis Unit have enabled it to focus on the processing and prioritising of suspicious transaction reports ("STRs"), operations and strategic analysis. The Supervision and Enforcement Unit have also gone through significant changes focusing mainly on the identification and assessment of money laundering and terrorist financing risks, the supervision of compliance with anti-money laundering and combatting financing of terrorism ("AML/CFT") obligations and enforcement where there are identified breaches. The Supervisory Unit has been split to focus on three main areas being credit and financial Institutions, investments and virtual financial assets, and designated non-financial businesses and professions.

The FIAU Board of Governors now includes additional members who are nominated by the Malta Gaming Authority and the Commissioner of Revenue. The Attorney General is no longer a member of the Board.

Increased FIAU Activity

The FIAU as the national AML/CFT supervisor, increased pecuniary fines for AML/CFT breaches by 190% in 2019. It imposed €3.9 million on subject persons. During Q4 2019, the FIAU's Compliance Monitoring Committee ("CMC"), which is responsible for considering potential breaches of AML/CFT obligations and determining appropriate measures, was strengthened with the roll out of an enforcement categorisation tool to help decide which administration measures must be applied in response to AML/CFT breaches. At the same time, a sanctions tool was introduced to assist the CMC decide what pecuniary fines to impose. The sanctions tool has already been used in five cases.

The FIAU has also reported that it received 2,778 STRs in 2019, representing a 65% increase over 2018. In preparation for the new STR submission system, the FIAU has published the test environment for the use of the reporting entities to test the system and train their internal staff. By the 29 April 2020 all the reporting entities must then register on the new production environment in preparation of the data migration of the FIAU system. The existing STR submission system should be used until end of June 2020 and another FIAU communication will be published to confirm the details for the Go Live date.

Amendments to the Prevention of Money Laundering Act ("PMLA") (Cap. 373 of the Laws of Malta) and the Prevention of Money Laundering and Funding of Terrorism Regulations ("PMLFTR") (S.L. 373.01)

Several amendments were made to the PMLA, by virtue of Act No.1 of 2020. The amendments seek to transpose a number of provisions of the 5th AMLD. Amendments have also been made to clarify certain provisions and to enhance the legislative framework in place for the prevention of money laundering and funding of terrorism.

There have also been a series of amendments to the PMLFTR seeking to transpose the provisions of the 5th AMLD. These include the:

- Widening of the definition of "relevant activity" to include non-financial businesses.
- Revision of definitions such as "occasional transaction" and "beneficial owner."
- Amendment to the definition of "politically exposed person" to include an exhaustive list of prominent public functions.
- Amendments to Regulation 7 on Customer Due Diligence ("CDD") and an additional Regulation 7A dealing with CDD for electronic money;
- Revision to Regulation 11 to harmonise the obligation of conducting enhanced due diligence measures particularly when dealing with non-reputable jurisdictions; and
- Amendments to Regulation 16(2) which clarifies the instances when subject persons are allowed to share information on suspicious transactions submitted to the FIAU.

The FIAU has also issued a consultation paper on proposed Amendments to the PMLFTR and the FIAU Implementing Procedures Part 1, which seek to address shortcomings identified by the MONEYVAL assessors in Malta's Fifth Round Mutual Evaluation Report. In this regard the proposed amendments seek to revise the time-frames for submission of STRs as well as impose administrative sanctions on persons who have a senior managerial role and who are found to be responsible for breaches of AML/CFT obligations.



MALTA PRODUCTS & SERVICES

REGULATORY & COMPLIANCE SERVICES

Alter Domus, both globally and locally, has been building a robust team to support our clients with the growing list of regulatory challenges. We continue to support our clients with specific ad hoc assignments which will span for a couple of weeks or months (depending on the size of the engagement) or long term assignments and mandates where our role will be more of a permanent nature.

Alongside our people we have been enhancing the technology experience for our clients, employees and other stakeholders through more digitalised processes and the partnering with specialist technology providers such as Diligent.

Regulatory Reporting

Alter Domus provides a variety of services relating to regulatory reporting among which there are the Annex IV and Annex V reporting for funds, FATCA reporting, CRS reporting, FINREP, AIFM related reports and Central Bank reporting. It also has the capacity to assist its customers in navigating new regulatory matters and has the in-house competence to assist its customers with any remedial actions required after regulatory visits have been carried out.

Alter Domus also assists clients with reporting relevant information in relation to Trusts via TUBOR online platform as well as in relation to Beneficial Owners in relation to companies and partnerships.

Operational Change Management & Leveraging Regulatory Data

Alter Domus can provide operational change management advice with the aim of optimising the clients' processes and managing change to ensure control over set requirements. It has the capacity to review budgets and business models accordingly. Alter Domus also has the expertise to assist with the re-organisation of data and processes and the optimisation of the use of capital.

Alter Domus is in a position to provide such services through an extensive in-house experience in providing regulatory support to Bank and Asset Management companies, together with expertise in transforming the way entities manage information.

Corporate Governance

This has also been a key part of our offering. Due to increased ongoing requirements for substance and local corporate governance we have expanded our team of senior management to support our clients better in this aspect by giving them the opportunity to engage with specialist board

members who have many years of experience. We also understand that some of our clients may require specialist support at the level of the board which is not related to finance and/or regulatory matters. We have therefore engaged with a selected number of non-executive board members who are not employed by Alter Domus but who can offer their services to our clients. Such non-executive board members have been intentionally selected to cover areas that our clients have asked us from time to time such as specialist support in Intellectual Property, Maritime and Logistics, Real Estate, Technology, etc...

Compliance Officer and MLRO Roles

Regulated companies need to ensure that they have proper controls in place. Alter Domus Malta can act as a Compliance Officer and/or MLRO on client companies thereby ensuring that all the required policies and procedures are in place, backed up by the necessary training which should be provided to staff members. Alter Domus Malta has the experience to guide clients on certain registers and manuals which need to be kept and presented to the Board of Directors from time to time. Appropriate Compliance Monitoring Plans for customers can be drawn up and followed through. We can also provide in-house expertise on anti-money laundering and counter terrorist financing measures.

Diligent

As a step towards implementing developments in technology within its operations, Alter Domus is rolling out a fully integrated service through a board portal solution which shall enhance the experience of client meetings. Alter Domus has partnered with Diligent, a market leader in board and governance support services, to offer a digital board platform – Diligent Boards

The main benefits of Diligent include a seamless, on and offline experience for meeting attendees such as:

- Instant access to board materials from anywhere and on any device;
- Easy review of documents and the ability to make handwritten annotations which can be shared with other members;
- Monitoring of updates or changes to board materials;
- Ability to access historical board packs and/or approved resolutions with a true search functionality;
- Enhanced efficiency of board meetings and decision making processes;
- A highly secure platform which is non-Adobe based, certified ISO 27001, SSAE 16/ISAE 3402 (Soc 1 Type 2), with data encryption, hosted in the European Union.

MALTA PRODUCTS & SERVICES

OUTSOURCING SERVICES DURING COVID-19

Despite the disruption brought on by the COVID-19 crisis, investor expectations remain high. Private equity and real estate fund managers are now faced with a new problem: coping with the immediate need for data and reporting as panicked investors demand daily, if not hourly, information on how their portfolios are faring.

Not all fund managers are equipped to handle this increased inquiry volume, let alone the complexity of managing their employees' remote working capabilities while maintaining efficiency.

Many smaller firms don't have the bench strength to be able to adequately manage and shift staff responsibilities or the technology or bandwidth to remotely keep up with current demand. And for firms straining their internal back offices to handle these increasing reporting demands and the challenges of cybersecurity requirements with a remote-access workforce, not having the right people and technology in place can put the entire infrastructure at risk.

"Private equity and real estate firms are stretched thin as they try to help their portfolio companies stay afloat, get data, and reassure their LPs. They're being pulled in too many different directions," Przemyslaw Koger, Alter Domus Relationship Director said.

New Demands, New Challenges

Many firms have Business Continuity Plans (BCP) they can activate, however, having a remote workforce for an extended period of time poses a large risk. Outsourcing back office activities continues to be a key continuation strategy.

"Never has the world faced such a daunting crisis, and many of our clients tell us that if they hadn't outsourced, it would have been difficult to ensure their back office runs seamlessly," Przemyslaw explains.

That's because firms that make use of outsourced solutions spend less time ensuring that their back offices are functioning efficiently, and instead have more time to spend focusing on the key aspects of their business and existing relationships with their investors.

"In short, private equity and real estate firms that have not yet outsourced are giving their peers a competitive advantage because instead of focusing on their investment strategy and the operational needs of underlying portfolio companies, they are spending time on non-value add tasks for their clients" Chris Casapinta, Country Executive Malta, said.

Timing is Essential

No one knows how long the disruption from COVID-19 will last, but savvy managers understand that then it comes to servicing their investors, time does not stand still. And that's why so many of them are relying on their outsourcing partners to help them get through this crisis. Thanks to significant preparation efforts, Alter Domus has seen no disruption in the company's ability to service clients, even new clients coming on board now. "Some managers worry that they've waited too long to outsource their fund administration, but currently, we are able to on-board new managers in a matter of weeks," Przemyslaw revealed.

"The sole and only focus of our business is to make sure that there is no disruption in timely, efficient and accurate reporting to investors," Przemyslaw said. "We are using all of our resources and ability to ensure that's happening from top to bottom."

Your Present Relationships Will Determine Your Long-Term Success

Investors expect their managers to be fiduciaries of their investment under any and all circumstances, and if managers stumble through this crisis, it puts that relationship at risk. But it's those very relationships that build your business and can lead to future commitments for follow up funds.

Because investors expect managers to provide good returns and demonstrate results — even in a pandemic — if anything stops the flow of information that investors need to make wise decisions, they will lose confidence. Managers can't expect investors to grant them leeway because of the crisis. Instead, they have to rise above it and continue to provide the level of transparency investors expect while adhering to existing timelines.

"You've worked hard to develop your relationships with your investors. Many institutional investors invest with a lot of different managers and will be comparing to see which managers were able to continue to provide data on a timely basis. Competition for investor attention continues to be fierce and firms that suffer disruptions will risk souring relationships, invite comparison and potentially provoke additional due diligence concerns if they can't expertly handle this crisis." Chris Casapinta said.

MALTA PRODUCTS & SERVICES

BREXIT SOLUTIONS IN MALTA

After 47 years of EU membership, the United Kingdom formally left the European Union (EU) on 31st January 2020 and the transition period begun on 1st February 2020, during which EU law continues to apply to the UK. This is due to end on 31 December 2020. The British government insists that the transition period will not be extended. If there will be one, it must be agreed upon before 1 July 2020.

What can we expect to change?

At first, not much. During the 11-month transition period, the UK will largely stick to EU rules. That means that UK stays for now in the EU's customs union and single market, meaning the same trade rules and free movement of goods and services. Freedom of movement for people stays the same and the EU's top court still has jurisdiction.

But there will be no more British voices in the European Parliament and no British ministers at EU meetings where big decisions are made.

Impacts on UK entities and people

Put simply, if you are British, you are no longer considered an EU citizen. UK citizens will be able to visit the EU for up to 90 days at a time, or to work in the EU, but they will need a visa waiver. UK nationals should register as a resident in the country where they reside. Different EU countries have their own rules on how to apply for permanent residence.

UK financial services licensed firms should position themselves carefully for possible Brexit scenario, moving subsidiaries, staff and assets to reliable EU jurisdictions.

Britain's financial services sector hopes to maintain a close relationship with EU, but won't enjoy the same level of freedom in the EU market and is fearing the end of the so called "Passporting" regime that allows banks and financial services businesses licensed in the UK to passport their services in any EU member state. That is important as UK is the largest exporter of financial services, exporting over £20 billion of services in the EU in 2014.

The Maltese solution

Located in the centre of the Mediterranean between Europe and North Africa, Malta is the European Union's smallest member state. It has emerged as one of the most remarkable success stories in the Eurozone. Recognised for its pro-business attitude, state-of-the-art infrastructure and modest costs of doing business, it has become the go-to country for growth-minded entrepreneurs and multinational companies.

Residence and citizenship

Malta is an attractive destination to live and offer different solutions to reside and enjoy freedom of movement in the EU, such as the Highly Qualified Persons Rules, residence programmes and Citizenship by Investment.

Corporate and ancillary services

Malta is an established and renowned financial centre due to its extensive network of double taxation agreements and because it adopted all EU financial services regulations when it became a member state of the European Union. The Malta Financial Services Authority (MFSA) was established in 2002 and it is the single regulatory body for financial services in the country.

This is just one of the reasons why Malta is increasingly being chosen as Business Hub for many services like Funds, offering many types of Collective Investment Schemes (PIF, AIF, NAIF), regulated companies (Investment Companies, Payment Service Providers, Electronic Money Institution), as well as Trusts and Foundations, which are powerful tools to be used for a variety of purposes including estate planning, asset control and protection, preservation of family wealth, protection of minors and persons with special needs and making provision for charities.

Companies registered in Malta are subject to tax on their worldwide income less permitted deductions at the corporate income tax rate which at present stands at 35%. Upon receipt of a dividend, shareholders of a Malta company may claim a refund of all or part of the Malta tax paid at the level of the company on such income.

Last but not least, Malta is a centre of excellence for yachting, shipping, and aviation, making the island an established and reputable International Register. The yachting register is now one of the largest in the world, ranking first in Europe and sixth worldwide in terms of registered tonnage.

Key takeaways

Malta is an ideal destination for UK licensed business and UK citizens looking to continue enjoying freedom of movement and services within the European Union. It is a forward-thinking, cost effective, English speaking country (with all official documents in English) with a large pool of highly qualified human capital.

MALTA AFTER HOURS

ASSET MGMT FORUM, FINTECH EVENT & IFSP CONFERENCE



Alter Domus, in collaboration with Deloitte Malta and GANADO Advocates, organized the fifth Asset Management Forum on 20 February. The forum was aimed at asset management professionals and, through a series of panel discussions and presentations, explored legal and regulatory developments within the financial services sector.

Following Chris Casapinta's opening remarks, the forum proceeded with a range of insightful panel discussions. Stéphane Bourg shared his expertise on the "Raising the Bar in AML/CFT Compliance" panel with MFSA and FIU, and Przemyslaw Koger discussed best practices, expectations, and industry insights on valuations of alternative investments. We would like to thank all who attended and look forward to hosting the sixth Asset Management Forum next year.



On 17 February, Edoardo D'Angelo attended The Malta Business Network's event called "Malta Financial Services Authority's Strategy on FinTech." The evening event featured speakers such as Dr. Christopher Buttigieg, Chief Officer Strategy, Policy and Innovation for the MFSA who covered MFSA's new fintech strategy.

All who attended received in-depth knowledge of the strategy, which is based on six pillars: regulation, ecosystem, architecture, international links, knowledge, and security for the MFSA. The strategy also includes promoting the implementation of open architecture and the use of APIs in financial services, encouraging financial institutions to become much more proactive in offering financing solutions to the FinTech sector while supporting private equity, and issuing cross-sectorial cyber security guidelines for the financial services sector.



On 21 February, Lorraine Meachen attended the IFSP Annual Conference which gathered practitioners from the financial services industry. The morning session was dedicated to AML developments and the deep and far-reaching impact of the Moneyval report published in late 2019.

In the afternoon, the conference was split into a number of breakout groups, each catering to different areas of interest such as fintech, covering both virtual assets and traditional financial services offered through technological channels, corporate services, transparency issues like DAC6, AEIO and Registers of Beneficial Ownership as well as capital markets and the listing rules framework. The day closed with a plenary discussion session tackling key fiscal developments affecting cross-border structures.

ALTER DOMUS UPDATE

NEW APPOINTMENTS & PROMOTIONS IN MALTA

New Appointment in Malta

On April 6th, Paula Galea Farrugia joined the organisation as the new Head of Regulatory Services in Malta.

Paula Galea Farrugia began her career in 2004 by joining the Company Compliance Unit of the Malta Financial Services Authority. In 2006 Paula joined Portman International where she headed the Legal & Corporate Department and acted as Company Secretary for a number of companies. Whilst working at Portman, Paula also managed the London and Dublin offices of the firm. Paula joined MeDirect Bank in 2009 as the General Counsel, Head of Compliance and MLRO of the Bank. She was appointed Group Company Secretary in August 2017.

Paula holds a Doctorate in Laws and a Masters in Financial Services from the University of Malta.



Paula Galea Farrugia
Head of Regulatory Services, Malta

Promotions in Malta

Over the last few weeks we have also been working on building a more robust management structure. This includes the appointment a number of Senior Managers and Managers who will be able to run teams and/or support existing team leaders.

Carmelo Borg and Mark Borg have been promoted to Senior Managers whilst Luigi Farrugia, Diane Curmi, Chanelle Zammit, Antonella Rubeis, Juan Paulo Concha, Genevieve Ferreira, Melinda Magyar and Rahul Soyjaudah have been promoted to Managers.

We have also appointed Martina Borg as Head of Tax. Martina will gradually reduce her client portfolio to support our business from a taxation perspective.

We have also had a number of other promotions from Officers to Senior Officers, as follows: Kurt Farrugia, Benazir Nuckchady, Chloe Asci, Alan Brown, Rigine Garcia, Tooshina Goorcharan, Ibrahim Msalati, Hasara Nanayakkara, Roman Nullas, Yuvan Soorojebally, Madina Dreeneauth, Francesca Vassallo, Ashlee Cakebread and Marco Sbrana.



Carmelo Borg
Senior Manager



Martina Borg
Head of Tax, Malta



Mark Borg
Senior Manager

ALTER DOMUS UPDATE

NEW GROUP EXECUTIVE BOARD MEMBER

In early February, Alter Domus announced that Jessica Mead joined the Group Executive Board as Group General Counsel.

In her role, she oversees internal legal matters, risk and compliance, BCP, cyber security, quality assurance, regulatory oversight and company secretary activities. Leveraging on her extensive experience as Head of Compliance and General Counsel for North America, Jessica will ensure that Alter Domus keeps evolving in full compliance, security and efficiency within an ever-evolving regulatory and legal landscape.

Group Executive Board

The Group Executive Board is composed of the following members:



Doug Hart
Chief Executive Officer



Andrew Cherry
Chief Financial Officer



Joanne Ferris
Chief Human Resources
Officer



Jessica Mead
Group General Counsel



George Rologis
Chief Corporate
Development Officer



Sandra Legrand
Regional Executive
Europe



Alexander Traub
Chief Commercial Officer,
Regional Executive Asia Pacific

WE ARE WHERE YOU NEED US

AMERICAS

- Cayman Islands
- United States:
Chicago (IL)
New York (NY)
Darien (CT)
Austin (TX)
Indianapolis (IN)
Los Angeles (CA)
- Canada
- Latin America

EMEA

- Belgium
- Cyprus
- France
- Germany
- Guernsey
- Ireland
- Jersey
- Luxembourg
- Malta
- Mauritius
- Spain
- The Netherlands
- United Kingdom

ASIA-PACIFIC

- Australia
- China
- Hong Kong
- Japan
- Singapore
- India

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