Aug/Sept/Oct 2019

GIBRALTAR INTERNATIONAL

FINANCE ■ INVESTMENT ■ BUSINESS

The continued growth of Gibraltar's world-leading eGaming sector

Sponsors

Gibraltar International Magazine is grateful for the support of the finance industry and allied services in the form of committed sponsorship

We would like to thank the following sponsors:

GIBRALTAR FINANCE
Tel: + (350) 200 50011 • info@financecentre.gov.gi
www.gibraltarfinance.gi

ARTEX RISK SOLUTIONS (GIBRALTAR) LIMITED
Tel: + (350) 200 74570 • info@artexrisk.gi
www.artexrisk.com

BANK J. SAFRA SARASIN (GIBRALTAR) LIMITED
Tel: + (350) 2000 2550
marvin.cartwright@jsafrasarasin.com
www.jsafrasarasin.com

BDO LIMITED
Tel: + (350) 200 47300 • info@bdo.gi
www.bdo.gi

DELOITTE
Tel: + (350) 200 41200 • info@deloitte.gi
www.deloitte.gi

THE EUROPA GROUP
Tel: + (350) 200 79013 • info@europa.gi
www.europa.gi

EY LIMITED
Tel: + (350) 200 13200 • info@gi.ey.com
www.ey.com/gi

FIDUCIARY MANAGEMENT LIMITED
Tel: + (350) 200 76651 • info@fiduciarygroup.com
www.fiduciarygroup.com

GIBRALTAR STOCK EXCHANGE GROUP (GSX GROUP)
Tel: + (350) 200 67822 • info@gsx.gi
www.gsxgroup.gi

GIBTELECOM
Tel: + (350) 200 52200 • info@gibtele.com
www.gibtele.com

HASSANS
Tel: + (350) 200 79000 • info@hassans.gi
www.gibraltarlaw.com

IFAI LIMITED
Tel: + (350) 200 67469 • info@ifai.gi
www.ifai.gi

ISOLAS
Tel: + (350) 2000 1892 • info@isolas.gi
www.gibraltarlawyers.com

KPMG
Tel: + (350) 200 48600 • Info@kpmg.gi
www.kpmg.gi

PIRANHA DESIGNS
Tel: + (350) 200 45599 • info@pdg.gi
www.pdg.gi

RED RIBBON FUND MANAGEMENT LIMITED
Tel: + (44) 20 7183 3710 • enquiries@redribbon.gi
www.redribbon.gi

SAPPHIRE NETWORKS
Tel: + (350) 200 47200 • info@sapphire.gi
www.sapphire.gi

SG KLEINWORT HAMBROS BANK (GIBRALTAR) LIMITED
Tel: + (350) 2000 2000
gibraltar@sghambros.com
www.kleinworthambros.com

TRIAY & TRIAY / T&T MANAGEMENT SERVICES LIMITED
Tel: + (350) 200 72020 • info@triay.com
Tel: + (350) 200 76108 • enquiries@ttms.gi
www.triay.com
www.ttms.gi

GIBRALTAR INTERNATIONAL

Aug/Sept/Oct 2019

Volume 25
Number 3

Contents

Published by
Gibraltar International
Publications Ltd.
21 Bell Lane
PMB 104, PO Box 561
Gibraltar, GX11 1AA

Editorial enquiries
editor@gibraltarinternational.com

Advertising enquiries
sales@gibraltarinternational.com

Design
bilgoker@gmail.com

UK Agent
Tel: + 44 (0)1993 703560

Gibraltar, posting over 10% GDP growth and consistent budget surpluses, is the onshore success story in Europe.

Together with our partner firms across the various disciplines in the Gibraltar Finance Centre, we have as our foundation three main virtues; regulation, reputation and speed to market.

For more information visit the Gibraltar Finance website:
gibraltarfinance.gi

GIBRALTAR FINANCE
HM Government of Gibraltar

Gibraltar and UK open tax negotiations

In July it was announced that the Government of Gibraltar and the UK Treasury had opened negotiations to enter into a Double Tax Agreement, where it was anticipated that with hard work on both sides a final agreement could be signed within months.

Once concluded, the agreement will bolster Gibraltar's reputation as a robust and reputable financial centre. Importantly, the deal will also position Gibraltar's offering on an equal footing with competing jurisdictions that currently enjoy the benefit of a double tax agreement with the UK.

Chief Minister, Fabian Picardo, commented: "I am delighted to be able to welcome Robert Jenrick, the Exchequer Secretary to Her Majesty's Treasury to Gibraltar on this important occasion. Robert has long been a friend of Gibraltar, attending our Gibraltar Day in London events and it is a pleasure to see him on the Rock. Bilateral double-taxation agreements remove barriers to international trade & investment and provide a clear and fair framework for taxing businesses that trade between us. By entering into such agreements they benefit business and the economies of the jurisdictions concerned".

Robert Jenrick commented: "Gibraltar has a special place within the UK family. That's why I've come here today, to start discussions on a bespoke tax agreement between us to promote trade and investment, and help tackle tax avoidance."

Ramparts and Ince launch logo

London based law firm, Ince Gordon Dadds, who acquired the Gibraltar based law firm, Ramparts in April this year, officially launched the Ince logo at the five star Sunborn Hotel in July.

The celebration of the merging of the two companies was hosted by Ramparts Managing Director, Peter Howitt and Ince CEO, Adrian Biles. Chief Minister, Fabian Picardo, unveiled the logo to over 100 invited guests.

Peter Howitt addressed the guests and commented: "One of my main roles will be to sell Gibraltar as a jurisdiction to the wider Ince group internationally and tell them why their clients should invest in Gibraltar, as a safe and secure jurisdiction and in the current climate that is a key message."

Ramparts was established in 2012 by Peter Howitt, and specialises in eGaming, FinTech, Distributed Ledger Technology (DLT) and Cryptocurrencies.

DLT and Virtual Assets

Samantha Barrass, CEO of the Gibraltar Financial Services Commission, delivered a keynote speech at the Barcelona Trading Summit Conference in July.

The speech focused on the value of good regulation in protecting the market, investors, and consumers. She also outlined the important work of international organisations in Distributed Ledger Technology (DLT) regulation, and the implementation of Gibraltar's DLT regulatory framework.

Samantha explained that it is important for regulators to keep up with market developments in order to ensure that the regulatory perimeter adequately covers new financial innovations and went on to say: "most regulators are extremely interested in the role that virtual assets regulation can play in supporting the safe development of businesses that have the potential to provide enormous benefits to the economy and consumers".

Preparations for a No Deal Brexit

The European Commission (EC) has published a call to Member States to ensure that all necessary preparedness and contingency measures are in place in the event of a no deal Brexit. The Commission has said that it does not plan any new measures before the latest withdrawal date of 31st October.

The UK and Gibraltar were involved in intense preparations for a no deal Brexit at the end of March and subsequently on the 12th April. These plans were scaled back following the extension until the end of October, that was agreed between the UK and EU.

Ursula von der Leyen, who was elected the new EC President in mid July, said she would be prepared to extend the 31st October Brexit withdrawal date.

Gibraltar's budget 2019

By Neil Rumford, Tax Partner, EY Limited

Gibraltar's 2019 budget address on the 10th of June was the third budget announced in the shadow of Brexit. Alternating between an upbeat mood boosted by buoyant economic data, sombre references back to the challenges of the closed frontier and some digs at the opposition, Gibraltar's Chief Minister set out his budget for the coming year.

The headline figure was no doubt the £83 million recurrent budget surplus achieved for the year ended 31 March 2019. A record GDP per capita of $111,505 was estimated for 2018/19, reported to be 3rd highest in the world. The Chief Minister conceded that this figure is distorted by the fact that Gibraltar has a large proportion of workers not living in Gibraltar, as well as other factors.

Gibraltar's economy

More objective figures in the shape of employment statistics were quoted in the budget address. These appear to back up the claim that Gibraltar's economy has been consistently on an upwards plane in recent years. The number of employees in Gibraltar increased by 7% over the 12 months to October 2018 to a total of 29,995. That compares to a resident population of around 34,000 – made possible by the fact that 46% of workers in Gibraltar live in Spain, crossing the frontier every day to work.

There were few significant changes in terms of tax measures. Some cost of living increases to the allowances given under Gibraltar's Allowance Based System were announced. This is one of the two alternative tax systems under which an individual can be taxed in Gibraltar, the other being the Gross Income Based System. The system that results in the lower tax payable is the system that applies to an individual taxpayer. No changes were announced to the Gross Income Based System.

To give some examples of how this works out at different employment income levels:

Employment income	Tax	Overall tax rate
20,000	2,382	12%
30,000	5,490	18%
40,000	7,990	20%
60,000	13,590	23%
100,000	24,790	25%
200,000	49,940	25%
500,000	124,940	25%

The above shows the tax payable under whichever system would apply, given the income level and allowances available. For simplicity, it assumes the taxpayer is entitled to minimal allowances. Additional allowances may be claimed – most notably under the Allowance Based System for the first-time purchase of a home in Gibraltar, mortgage interest, nursery school fees, life insurance and medical insurance.

In summary, income tax should never exceed 25% overall, with very few exceptions (certain types income of non-residents is taxable at up to 39% - if you are a non-resident thinking of purchasing a buy-to-let in Gibraltar, get some tax advice first). On the positive side, savings income and capital gains are not taxable, and there is no VAT, wealth tax or inheritance tax.

Individuals relocating to Gibraltar to take up employment – and their employers – should be aware of some exceptions from the general rule that benefits-in-kind are taxable. For example, accommodation provided by an employer to such a relocated employee may be tax free for up to seven years from the date of relocation. This can in some circumstances be extended to an accommodation allowance.

Given the cost of accommodation in Gibraltar combined with the tax consequences of living in Spain, the provision of accommodation can be a useful and tax efficient part of a package, particularly for senior executives. Reimbursements for relocation expenses – and the legislation provides a fairly expansive list of what those could include – is another exception.

Category 2

For senior executives with specialist skills there is a special tax status available (subject to conditions) which limits tax on earnings to £29,940 per annum. The Category 2 status available to High Net Worth Individuals can also provide a cap on tax in Gibraltar of between £22,000 and £27,560. Note that this cap does not apply to some income derived from Gibraltar. Under both of these initiatives the taxpayer must have accommodation of a certain standard available for their use in Gibraltar.

On the corporate side, there were very few changes. Tax continues at a rate of 10% of taxable income, this being income from activities located in Gibraltar. Capital gains are not subject to tax, dividend income is almost always exempt and bank interest is not taxable (other than for banks and similar institutions).

Of interest to those working in international tax was an announcement of a Government consultation on the possibility of a notional interest deduction. This is a deduction that would be given to companies that are funded by equity, for example, by share capital and accumulated profits, to replicate the interest deduction that a company funded by loans may be able to claim. A small number of countries have adopted this in recent years – for example, Belgium, Cyprus and Malta. No doubt the Government will be treading very carefully here in case the EU State Aid machine is pointed in the direction of such initiatives.

The continued growth of Gibraltar's world-leading eGaming sector

The talk was all about collaboration, embracing new technology, and keeping customers safe, when industry experts met to consider the future of gaming at the KPMG eGaming conference, Ray Spencer reports

But just below the surface, spoken only sotto voice, was growing concern at how two US businesses - Amazon Web Services (AWS) and Google - are limbering up to use the Cloud and enter the eGaming market internationally.

There is a perceived risk that the two firms might gobble up US online gaming revenue - predicted to dwarf that of the UK and Europe combined - and be transformative for the gambling industry worldwide, much as has been seen with online video streaming and terrestrial TV channels.

In January, Amazon was linked with development of a cloud gaming service streaming to homes and last summer Google revealed its xCloud, while Apple is interested too and Sony is trying to develop what has been dubbed 'the Netflix of gaming'.

Speaking at the 9th annual KPMG eGaming conference, attended by 280 professionals at Gibraltar's 5-star Sunborn Hotel, Peter Isola, senior partner of ISOLAS law firm, held: "The issue now is how gaming operators can use the opportunities presented by Google and Amazon cloud services: how, as a jurisdiction, can we measure the footprint to ensure we maintain the level of regulation that we have established.

"It is important to us that the gaming company's footprint remains in Gibraltar economically." Isola's remarks brought into sharp focus behind-the-scenes activity to recast Gibraltar's Gambling Act by the autumn to ensure it remains the premier jurisdiction for licensed online gaming companies and their suppliers.

"We still have the original remote gambling licenses", Peter Montegriffo, a partner specialising in eGaming at Hassans law firm, noted. "The proposed reforms are not just about regulation of tech, but must also take account of substance requirements and tax developments. Some of the models adopted in other jurisdictions need to be reviewed. There should be renewed consultation before any final position is adopted," he declared.

Basically, the issue is about servers and where they can be located and what each does. Andrew Lyman, Gibraltar's Gambling Commissioner, explained: "The present licenses for gaming companies are predicated on location of technology and we want to maintain some regulatory discretion over what we do and don't grant, so I think we will end up adding 'mind and management' to the legal criteria. Rather than drop the IT provision, we are more likely to say we want to retain discretion."

Reviewing servers

Ten new licences were issued in 2018-9 to six companies, split evenly between gaming operators (B2C) and games developers & suppliers (B2B). Companies have significant resources and investment in Gibraltar, yet others, particularly start-up B2B firms, want to be on The Cloud, which potentially lowers operators' costs to fund things like, compliance,

Continued p12


TOP RANKED
Chambers
GLOBAL
2019
ISOLAS


Antequera
Olvera
Álora
Ronda
la Frontera
Marbella
Estepona
GIBRALTAR
(to UK)
Ceuta

Continued from p10

ensuring Responsible Gambling (RG), and flexibility. At present Gibraltar does not permit server use beyond its territory.

Consultation with the industry also involves B2B companies – they account for half of the 30 eGaming licenses – and many want to be on webservers like Google Cloud or AWS, because "they contend that the cost of bandwidth here is relatively expensive, and the cost of kit", Lyman declared, "so we'll probably end up licensing the B2B software and supply chain to Gibraltar's B2C licensees, but with some flexibility on IT infrastructure".

After the £10,000 application fee, gaming companies at present pay £100,000 for their licenses and B2B's pay £85,000, although they don't pay gaming tax. "We will look at how small start-ups might initially be assisted by a reduced charge", but as Lyman observed: "I am certain that whatever results, we are not going to make everyone happy! If we are too liberal with our licensing regime, some who have built size and scale here – people and offices – will say it's unfair, while others want to supply Gibraltar firms using remote servers and they must pay for the privilege."

In the UK, where gaming companies already can use remote internet servers, there has been pressure on profits after fixed-odds betting terminals – dubbed "the crack cocaine of gambling" because of their reported addictive effect on players – maximum stake was cut from £100 to £2. The Point-of-Consumption tax for UK online bets has also been raised from 15% to 21%.

Profit pressure grows

"That has put further pressure on Gibraltar-based gaming companies, because we are paying more tax direct to the UK, reducing profitability in Gibraltar and making the local 10% corporate tax rate less beneficial as there is less to tax", Gibraltar Betting & Gaming Association (GBGA) spokesperson, Paul Foster, explained.

"Over the past year or more, there has been lower profitability generally for gaming companies, because of compliance costs and greater regulation", Foster declared. Most companies had taken a profits hit of between 5 – 10% as a result, some being up to 20% down.

Hence the interest in embracing the US market – which last summer permitted sports betting in all States – to offset other pressures, and all major firms are securing alliances with US casino and other gambling operators.

GBGA's Foster was emphatic: "Concern over Amazon and Google is not misplaced – we can never rule them out – so we should be wary as an industry. They are saying they can cover all of the US, but at present they are not involved in any eGaming. There is no such thing as 'the Cloud'; it's just somebody else's server."

Foster, who is Digital Compliance and RG Operations Director for GVC Group, Gibraltar's largest on-line gaming company, insisted: "The eGaming industry wasn't created in the US, it was born in Europe and we know how to do it – they don't. They are recruiting from Europe, but all European operators are going out there and securing their own local agreements. You will never be able to go in The Cloud throughout the US, because it's state-by-state rather than Federal regulation."

Gambling Commissioner Lyman revealed: "We have a generally risk-averse license regime. At one time we would only accept established brands, now we are slightly less risk-averse and have included a couple of well-managed B2C start-up businesses. Not all start-ups necessarily will succeed, but if we didn't accept them, we would simply drive them to other jurisdictions."

The first to benefit from license relaxation for start-ups two years ago was Addison Global, (AG) with former William Hill Operations Director Juergen Reutter as chief executive: in August 2018 AG launched MoPlay, an on-line betting and casino gaming site employing 80 people at the Gibraltar World Trade Centre. Mobile-focused Lottomart, another new B2C was licensed in January.

UK guarantees access

The UK – at present the largest eGaming market – has guaranteed continued access for Gibraltar businesses after leaving the EU (Brexit), which equally affects Gibraltar, but it also has prompted companies with EU customers to make contingency arrangements. Some EU states insist that gaming servers be within the bloc and this has led most affected companies to seek operating licences additionally in Malta or Ireland.

In February, GVC re-located two servers and some staff to Ireland in preparation for its EU-facing online gambling business, utilising Malta eGaming licenses, but it emphasised: "Our online businesses will continue to be headquartered in Gibraltar" where it opened in 2008 and now employs over 1,000 people locally, 15% up on a year ago.

BetVictor and William Hill, with around 350 staff each, and Lottoland (some 250 staff) and 888 (230 staff), are amongst others publicly committed to remain in the jurisdiction.

But in late May, bet365, Gibraltar's second largest online gaming business with around 550 staff locally, confirmed it was relocating most operations to Malta, where it has a large office complex "to maintain and enhance operational efficiencies". Foreshadowed a year ago, the move prompted on-going government negotiations over how many and which posts must stay to satisfy Gibraltar license obligations, including still having a degree of substance in the territory, such as offices, staff and some 'mind & management'. Interpretation of those requirements will be a government decision.

Recruiting scramble

Almost all gaming companies have been scrambling to attract bet365 staff, and holding recruitment fairs. "There are a lot of vacancies,

Continued p14

Continued from p12

because Gibraltar has been suffering, particularly since Brexit negotiations began, in obtaining talent and it has left open a number of job opportunities. Without a shadow of doubt, the market will easily absorb every single person wanting to stay," asserted GBGA's Foster.

Albert Isola, Minister for Business and responsible for eGaming, insisted: "Gibraltar remains the best jurisdiction in the world from which to do well-regulated, reputable online gaming business". Two weeks after bet365 confirmed its Malta move, Gamesys, a prominent UK-based gaming operator and games developer formed in 2001, launched a new UK sportsbook site, Virgin Bet, that sits alongside fellow group Gibraltar licensees, including Profitable Play and Leisure Spin.

Gibraltar's eGaming firms today employ around 3,800 people, 300 more than a year earlier) and in total contribute around 25% to the local economy. Minister Isola insisted: "The sector continues to make a very significant contribution to the economy in terms of corporation tax, PAYE and gambling charges and fees."

Tax changes neutral

Gambling taxes previously were based on Gross Gaining Yield (GGY) - stakes minus payout - at 1% with a £425,000 cap pa that benefitted larger operators; now there's a more progressive GGY tax rate of only 0.15%, but with no limit.

As a result, in 2018-19, the government found revenue from gaming duty and licences down £1.5m to £12.5 million, but in the current year revenue has been forecast to be £14m, broadly flat year on year. No separate figures are available for the sector's PAYE and business tax income.

"There continues to be a lot of consolidation in this industry", Hassans' Montegriffo noted, but also revealed: "I have evidence of significant private venture capital funds looking to invest in existing gaming operations in Gibraltar and elsewhere; there is still a keen appetite for growth in this area and to chase opportunities as they open up."

The government believes "there is a major opportunity for operators to expand into Asian markets from Gibraltar" and the review of gambling, now being led by retired Gambling Regulator, Phil Brear, is expected "to build one gold regulatory standard again that is fit for the future".

No rush to enforce

On the planned introduction of fines for license transgressions rather than revoking them, the Regulator maintained: "Gibraltar, essentially, is a compliance-based regime and we work on the basis of the lowest form of intervention to achieve the objective, which means I don't want to rush to enforce action - though I couldn't rule it out.

Through structured site visits to operators, Lyman is discussing standards and identifying areas where improvement is needed. "For example, companies have been very focused on the UK, but international business is also being done from here, not just within the EU, and I need to ensure that similar standards are applied across the entire business," he said.

GBGA's Foster commented: "The current regime is a very blunt instrument and we don't like it as an industry. We believe there's no point in having rules if nothing happens when they are broken and if we want to build a better regulatory framework then we need reasonable and proportionate enforcement."

In November, the UK Gambling Commission (GC) revealed nearly £14m in penalty packages will be paid by three online casino companies over failings to put in place effective safeguards to prevent money laundering and keep consumers safe from gambling-related harm.

Gibraltar University is establishing what it hopes will be a world-leading charitable research facility focusing on aspects of Responsible Gambling (RG) with a budget of more than £2m a year funded through an industry levy and also fines.

The GBGA believes that any UK fines paid by Gibraltar-based companies should be given to a Gibraltar RG project to help problem gamblers. The plan is for the University to establish an international RG Centre of Excellence with firms collaborating by providing anonymised data and the research findings shared with all contributors. At present, privacy laws prevent data sharing on individual problem gamblers.

Prof Catherine Bachleda, project leader, explained: "There is a lot of information out there in companies that have their own research programmes, in data held on customer experiences, age profiles, etc. and on what works and what doesn't."

£2m for information sharing project

Andrea Lazenby, Lottoland's compliance director, suggested: "In the last year there has been a sea change - a new appetite to collaborate and discuss the agenda for future action in relation to RG. Customers are more savvy today and are asking what we are doing."

Yet Sarah Hanratty, deputy chief executive of Senet, an independent RG standards UK industry body, maintained: "If there is collaboration, there needs to be tangible change. From my experience with the alcohol industry, [collaboration] needs to be done quickly; it will come about only when industry chief executives meet to give the subject focus."

Ian Ince, Playtech's head of regulation and compliance, felt: "Regulators also need to collaborate more on standards required - some have a less generous approach to the industry. Media and public agencies are prompting regulators to take action that is not well researched and with a knee-jerk reaction. The risk is that regulators are more interested in what the Guardian or Daily Mail newspapers are saying, rather than listen to the industry about what really is happening."

Regulatory difference

Gibraltar and UK gaming authorities have committed to "greater regulatory alignment", but industry sources in the jurisdiction suggest the stances on regulation and enforcement "are going to stay quite a long way apart".
One source who chose not to be identified, claimed: "It's very strict in the UK in terms of investigations and not working with the industry, whereas in Gibraltar it's more a case of working with the industry to find solutions."

While pointing to a similarity of regulatory approach in the UK and Gibraltar, Lyman (who was involved in the establishment of the UK GC) conceded: "The UK GC works in a difficult political and media environment, as I have found also with other European regulators, and still has been effective in raising regulatory standards.

"There is however, collaboration based on commercial understanding between the Gibraltar regulator and licensees on compliance and policy", Lyman suggested: "The UK GC will continue to take its approach, but that will not stop me being collaborative in Gibraltar."


Change can be a good thing.
A smooth transition is the key.
Whether it's audit rotation or political change, KPMG's Audit, Tax and Advisory professionals are dedicated to a smooth transition for our clients.
Get in touch:
info@kpmg.gi
Anticipate tomorrow. Deliver today.
KPMG
©2019 KPMG Limited, a Gibraltar limited company and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved

Brexit and the Gibraltar Funds Industry

By Jay J. Gomez, Senior Associate, Triay & Triay

Even before the referendum in June 2016 there were numerous articles on the likely impact Brexit would have on the financial markets generally. From the Gibraltar funds industry perspective, Brexit is likely to have little negative impact and if promoted effectively could in fact improve Gibraltar's rankings in the international arena.

Gibraltar's primary fund products are the experienced investor fund (EIF) and the private scheme (private fund). Both products are born out of domestic legislation, fall within the alternatives space, pre-date EU legislation on alternative investment funds (Alternative Investment Fund Managers Directive 2011/61/EU)(AIFMD) and most importantly, will remain unchanged post-Brexit. The large majority of the EIFs and private funds established to date remain out of scope of AIFMD: primarily by ensuring that their assets under management do not exceed €100M or €500M in the case of certain closed-ended funds. This is commonly referred to as the de minimus threshold or a small AIFM.

With the exception of the pan-European marketing passport and the ability for a fund manager to manage funds domiciled in any EU jurisdiction, AIFMD has, since its inception, rightly or wrongly, been perceived quite negatively by the global asset management sector for a whole host of reasons. Whilst of course consumer protection is at the core of every regulator's objective, the industry's main issue with the AIFMD has been the perception that it was one of the EU's knee-jerk reactions to the 2008 financial crisis and has substantially increased their cost ratios.

The global industry's primarily negative perception of AIFMD has resulted in a trend which was quite contrary to what many thought the AIFMD would achieve: in the build-up to the transposition date, many believed AIFMD would result in a mass exodus of funds from traditional offshore jurisdictions into EU jurisdictions in order to seek a higher

Continued p18

Artex
Ensuring Greater Understanding

Artex Gibraltar offers an extensive range of insurance and reinsurance company solutions throughout Europe. We have more than 20 years of experience working in partnership with clients to design, license and manage insurance companies. Our leading market expertise, practical approach and personal touch will guide you from the genesis of an idea to development of the project and ongoing evolution.

Our insurance management services include:

- Direct underwriting vehicles passporting into the United Kingdom and Europe
- Reinsurance underwriting vehicles
- Protected cell companies
- Insurance-linked securities and structured transaction administration
- Effective solutions for legacy business and run-off

Operating in over 30 domiciles and in more than 15 offices internationally, we have the proven capacity to supply any alternative risk need. Let's work together to find the right solution for your business.

Artex

E: info@artexrisk.gi
T: +350.200.74570
W: artexrisk.com

Artex Risk Solutions (Gibraltar) Limited and Artex Corporate Services (Gibraltar) Limited are regulated and authorised by the Gibraltar Financial Services Commission to carry on business as Insurance Managers and Company Managers. February 2019.

30307A

Continued from p16

level of regulation and compliance. Following the transposition date, the reality was that many managers continued to domicile their funds in the Channel Islands and the Caribbean and neither was the momentum broken by investors only seeking to invest in AIFMD compliant funds. Investments into non-AIFMD compliant funds continued and, in many ways, the status quo was maintained. AIFMD applies to:

- EU fund managers that manage a fund (EU or non-EU);

> **As we all now know, notwithstanding the results of the referendum in Gibraltar (95.9% remain), Brexit = Gibexit**

- Non-EU fund managers that manage an EU fund; or
- Non-EU fund managers that market their fund (EU or non-EU) in the EU.

As we all now know, notwithstanding the results of the referendum in Gibraltar (95.9% remain), Brexit = Gibexit.

Post Brexit it is likely that a Gibraltar fund will never fall within the scope of AIFMD unless it purposely structures itself to access the EU market (e.g. by appointing an EU fund manager or marketing itself in the EU). This puts Gibraltar's fund products back on a level playing field with the likes of the Channel Islands and the Caribbean but with the added benefit of a well-regulated EIF regime, a very competitive private fund product, a professional services sector that understands the industry and an appealing tax regime which stems from domestic law and will remain unchanged by Brexit. The Gibraltar fund proposition suddenly becomes very strong and far more convenient from a practical and travel perspective for those based on the European continent.

As they currently do now, post Brexit, EIFs and private funds may wish to promote in the EU using the national private placement regimes available for funds that are out of scope of AIFMD. Brexit does not change this.

Post Brexit, access to the UK from most jurisdictions is likely to be more cumbersome. On the other hand, from Gibraltar, the self-styled single market to be created between Gibraltar and the UK, puts the Gibraltar product at a huge advantage when compared to any other jurisdiction if access to the UK is a must. Gibraltar could become the gateway to the UK market for funds offerings.

Although at the point of writing this article it seems unlikely, if we do retain some form of EU market access, the ground work to Gibraltar's legislative framework has already been undertaken to ensure that EIFs and private funds can avail themselves of EU market access benefits if they so wish. The Gibraltar Funds and Investments Association in conjunction with HM Government of Gibraltar has worked very hard to ensure that our legislation is fit for purpose. This would result in EIFs and private funds complying with AIFMD only if they so wish to take advantage of the benefits and this is what we commonly refer to as the "dual regime".

Finally, in the retail funds space, the directives on undertakings for collective investments in transferrable securities (UCITS) has had a very different industry adoption and has become the benchmark for retail funds on a global scale. A small number of EU jurisdictions have become the "go-to" for the domiciliation of UCITS. There is a very large number of UCITS domiciled in those jurisdictions which are in-turn UK facing and thereby raise investment in the UK. If we assume a hard-Brexit, it will no longer be possible for those UCITS to market themselves in the UK. On the other hand, a Gibraltar UCITS post-Brexit will have UK access under the Gib-UK self-styled single market and this, if promoted effectively, represents a huge opportunity for Gibraltar.

Gibraltar could become a unique proposition for both the alternatives and retail fund markets.

Enhanced Tax Transparency in the European Union

By **Gavin Gafan**
Senior Manager, Tax, Deloitte Limited

It is evident that EU Member States (and indeed authorities at a global level) are improving how they communicate with each other on taxation, particularly so when it comes to curbing aggressive tax practices. The Directive on Administrative Cooperation (DAC) in the field of taxation, which has been ratified into Gibraltar's tax legislation, aims to provide the necessary procedures and platform to enable greater cooperation with other Member States, in order to help combat tax fraud and evasion. However, in light of international tax scandals, the EU has embarked on initiatives for the mandatory disclosure of information on potentially aggressive tax planning arrangements along the lines of Action 12 of the OECD's BEPS project. In this context, the European Parliament called for tougher measures against intermediaries who assist in arrangements that may lead to tax avoidance. The EU has issued new rules (phase 6 of the existing Directive – DAC6) set out within the EU Directive 2018/22, with the aim of obliging intermediaries to inform tax authorities of certain cross-border arrangements that could potentially be used for tax avoidance.

The provisions of DAC6 will need to be ratified into Gibraltar's Income Tax Act by no later than 31 December 2019. These rules will require intermediaries to report to the Gibraltar Tax Authorities on any cross-border arrangement that shows at least one of the indicators (hallmarks) stipulated in the Directive. It should be noted that the definition for an intermediary is broad and should include lawyers, accountants and tax advisers, but is also expected to apply to banks, trustees, insurance companies and asset managers.

Where no EU intermediary is involved, or where an intermediary can assert legal professional privilege, the reporting obligation will fall on the taxpayer. Applicable penalties for non-compliance should apply, the severity of which should be clarified once Gibraltar's tax legislation is updated to ratify the rules set out in the Directive.

The hallmarks outlined by the Directive are complex and require careful consideration against all business activities. There are five hallmarks (A to E), of which hallmarks under category A and B as well as points 1.2, 1.4 and 1.5 of Category C may only be taken into account if the main benefit test is fulfilled (i.e. where the main or one of the main benefits of the arrangement is to obtain a tax advantage). For avoidance of doubt, it should be noted that the main benefit test does not apply to hallmarks under category D and E as well as points 1.1 and 1.3 of Category C. That is to say, these would be taken into account irrespective of whether the

Continued p22

Whatever the size of your business...

u-mee

u-mee.com

u-mee Business

- All inclusive small business/SoHo multi-line telephony and Internet solution
- Efficient GPON fibre technology for low-cost performance
- 100Mbps download/20Mbps upload broadband with online/telephone support designed for non-technical personnel
- Includes 4 landlines with low-cost/free calls - keep your existing number(s)
- Optional TV service + Premium Support with advanced features
- Contact us to arrange a personal visit at your premises

Business Fibre

- Business-class Internet service for multiple users who depend on reliable cloud connectivity
- Direct fibre technology for ultimate performance, reliability and security to satisfy demanding IT professionals
- Up to 500Mbps download/100Mbps upload Internet with multiple customisation options
- Upgrades include multi-line PBX integration, additional interconnected sites and data centre hosting with resilient backup power
- 24x7 NOC monitoring with engineering support during business hours

...we've got the solutions

...to help you grow

Enterprise

- Premium high-availability solutions for international online and financial services applications
- Dual/direct fibre feeds for guaranteed reliability and performance
- SLA-backed symmetric DIA and ethernet/WDM local and international leased lines
- PCI-DSS certified hosting
- 24x7 NOC monitoring and onsite engineering support
- Find out more: enterprise@sapphire.gi

sapphire NETWORKS

sapphire-networks.com

Continued from p20

main (or one of the main) benefits of the arrangement is to obtain a tax advantage.

These hallmarks can be summarised as follows:

A. Generic hallmarks linked to the main benefit test:

A.1. Arrangements where a taxpayer complies with a condition of confidentiality which may require them not to disclose how said arrangement could secure a tax advantage;

A.2. Arrangements where the intermediary is entitled to receive a fee fixed to the amount of tax advantage derived, or whether or not an advantage is derived by a taxpayer;

A.3. Arrangements utilising standardised documentation and/or structure customised for implementation and available to more than one taxpayer.

B. Specific hallmarks linked to the main benefit test:

B.1. Arrangements where contrived steps are taken by the participant to said arrangement for the purpose of acquiring a loss-making company, discontinuing the main activity of said company and then using its losses to reduce its tax liability;

B.2. Arrangements which have the effect of converting income into other categories of revenue (e.g. capital or gifts) which are taxed at a lower rate or exempted from tax;

B.3. Arrangements which include circular transactions resulting in the round-tripping of funds mainly through interposed entities without other primary commercial function.

C. Specific hallmarks related to cross-border transactions:

C.1. Arrangements involving deductible cross-border payments made between two (or more) associated enterprises, where at least one of the following conditions are met:

1. The recipient is not tax resident in any jurisdiction;

2. The recipient is tax resident in a jurisdiction that taxes at the rate of zero (or almost zero);

3. The recipient is tax resident in a jurisdiction listed by the Organisation for Economic Co-operation and Development as non-cooperative;

4. The payment is exempted from tax in the jurisdiction where the recipient is tax resident;

5. The payment benefits from a preferential tax regime in the jurisdiction where the recipient is tax resident.

C.2. Arrangements where depreciation deductions are claimed in more than one jurisdiction on the same asset;

C.3. Arrangements where relief from double taxation is claimed in more than one jurisdiction on the same item of income or capital;

C.4. An arrangement where there is a material difference in the amount being treated as payable in consideration for the assets in the relevant jurisdictions involved.

D. Specific hallmarks concerning automatic exchange of information and beneficial ownership:

D.1. Arrangements which undermine reporting obligations under EU legislation or agreements on automatic exchange of information, or which takes advantage of the absence of such legislation/agreements;

D.2. Arrangements involving non-transparent legal or beneficial ownerships that have little substance or are established in a jurisdiction other than that of the beneficial owner.

E. Specific hallmarks concerning transfer pricing:

E.1. Arrangements involving the use of safe harbour rules;

E.2. Arrangements involving the transfer of hard-to-value intangibles;

E.3. Arrangements involving intra-group cross-border transfer of functions and/or risks and/or assets if the projected earnings before interest and taxes (EBIT) during the three year period after the transfer, of the transferor(s) are less than 50% of the projected annual EBIT of such transferor(s) if the transfer had not been made.

Whilst the application of the hallmarks is expected to be clarified once domestic legislation is in place, it is evident that significant tax knowledge and judgement is expected to be needed to determine whether a reporting obligation arises.

Intermediaries or taxpayers will be required to disclose reportable cross-border arrangements implemented in the period 25 June 2018 to 1 July 2020 to the Gibraltar Tax Authorities by no later than 31 August 2020, subsequent to which, all future reporting will be within 30 days (whichever occurs first) beginning:

A. On the day after the reportable cross-border arrangement is made available for implementation; or

B. On the day after the reportable cross-border arrangement is ready for implementation; or

C. When the first step in the implementation of the reportable cross-border arrangement has been made.

The provisions of this Directive aim to enhance transparency within the EU by promoting mandatory reporting between intermediaries and/or taxpayers and their local tax authorities. The information will be exchanged between EU tax authorities and may lead to further, targeted anti-avoidance measures being introduced.

www.deloitte.gi

Deloitte.

Remain or Leave?

By Grahame R Jackson, Partner and Tania Rahmany, Associate, Hassans

Whether the UK remains or leaves the EU without a deal is yet to be decided, which leaves many unanswered questions for jurisdictions like Gibraltar.

The Leavers would have us believe that there would be freedom from the constraints of the EU. Remainers have been almost silent on what the EU's future plans are and sell their vision as one of the status quo.

Neither of these visions is the full truth of what will happen. The world is one of increasing interdependence. Jurisdictions can no longer just do what they like with its tax arrangements. The OECD black list shows us that. Moreover, the EU will not remain the same forever - it is an engine for integration and direct taxation is the last great area where there are no harmonisation provisions.

Remain

If Gibraltar remains in the EU it will be subject to new EU provisions. The multi-track vision of the EU means that proposals will be implemented by member states at different times. We assume, for the purposes of this article, that Gibraltar will implement all proposals immediately.

2016 Anti-Avoidance Package. Includes proposals around transparency and refreshing the Anti-Tax Avoidance Directive will continue to be implemented. Pressure to reveal ownership of assets and expose those disguising their wealth will increase.

Directive on Administrative Cooperation 6. Gibraltar has agreed to implement this regime for Spanish related matters regardless of Brexit's outcome. The regime, which requires reporting of legal but "aggressive" tax avoidance arrangements, would be mandated onto Gibraltar by the EU if we Remain. It will radically alter the compliance landscape for local practitioners and impact on potential clients for international practitioners. Implementation is due on 1st January 2020.

Common Consolidated Corporate Tax Base (CCCTB). Proposed to be a common corporate tax system for the entire EU, the CCCTB has been rejected several times. However, the Franco-German Treaty of 2019 and the Meseberg Declaration by France and Germany pledging to work to a Franco-German joint economic zone with "actual tax convergence" means that the proposal remains live.

The latest proposal is for a two-stage process. The first stage is the introduction of a common corporate tax base. The rules about what is taxable and what is not for companies will be harmonised across the EU, but the allocation of which jurisdiction takes the tax will remain based on tax residence. The second stage is more radical, with tax being collected centrally and allocated according to a formula based on Payroll, Sales, and Asset location. The aim is to apportion tax to where income is generated and not to mere tax residence. The only discretion remaining with Member States will be the applicable rate which will be set within an approved range. Implementation would commence for groups with turnover exceeding €750m, later encompassing all groups within seven years.

Code of Conduct Group

The CCCTB will amount to EU-wide corporate tax harmonisation and an end to independence for Member States with regard to corporate taxation. It is estimated that it will eliminate 70% of EU tax avoidance It will fit naturally with recent proposals for national budgets within the Eurozone to be set jointly. Even if a member state opts out from the CCCTB it is unlikely they would be allowed complete freedom and the work of the Code of Conduct Group (a body which already exists and led to Gibraltar introducing various legislative amendments) would be accelerated.

Such a radical proposal is difficult to implement and Member States have jealously guarded their tax independence, but the CCCTB cannot be written off. The EU Parliament approved the draft directives in March 2018, with an implementation date of 1st Jan 2020, a date now impossible. The goal of "ever closer

Continued p26

Continued from p24

union" cannot be achieved without some form of direct tax harmonisation, and even if it is implemented in a patchwork approach it will radically alter the landscape for tax professionals in Gibraltar.

In 2016 the EU Expert Group on Direct Taxation issued a report which proposed, amongst other things:

One-Stop-Shop for paying Savings and Investment Tax. A one-stop-shop established in each jurisdiction will allow cross-border workers to pay tax to a single jurisdiction, which would be distributed to any relevant tax authorities.

A single EU-wide definition of tax residence. Many "mismatches" which tax planners utilise result from different definitions of tax residence. The Expert Group proposed a unified definition of tax residence to eliminate such mismatches.

A directive on income tax deductions. To allow a coordinated approach to deductions between Member States this directive would harmonise the EU income tax system and limit Member States' freedom to act.

This summary only addresses some of the proposals under consideration. Whilst some may take years to come to fruition the direction of travel is toward ever-increasing coordination and the limitation of variance between jurisdictions. Gibraltar could be dragged along by the UK and see it's hard-won tax independence as confirmed by the EU Court undermined by a rush to harmonisation.

Leave

The landscape for a Gibraltar outside the EU is no less uncertain. It will be freed from direct EU interference but the UK's involvement and leadership in the Organisation for Economic Cooperation and Development (OECD) will mean that Gibraltar will remain subject to pressures to conform with the hostile environment for tax avoidance schemes. It is highly unlikely that Gibraltar will undo recent amendments to its tax law, such as tax on inter-company interest or royalties. Gibraltar has worked hard to earn its rank of 28th on the Corporate Tax Haven Index (behind such "tax havens" as Spain, the US and Germany), and it is doubtful that any government would seek to preside over retrograde steps with risks of being blacklisted and the reputational damage that would imply.

As to changes moving forward the OECD is likely to be the main engine for change in the Leave scenario and is working on a number of proposals at the moment, including:

Continuing to develop BEPS. The OECD's Base Erosion and Profit Shifting (BEPS), has driven the global shift to tackle tax avoidance. BEPS aims to prevent international tax rules from facilitating artificial shifting of corporate profits from high to low tax jurisdictions. The drive towards transparency, ensuring economic substance and eliminating "brass plate" companies is being pushed through BEPS. We can expect more substance requirements, greater transparency requirements, and increased blacklisting of uncooperative jurisdictions.

There have been many BEPS-driven changes, but implementation is continuously reviewed and tweaked. BEPS will adapt and tackle newly-identified planning solutions.

Tackling challenges from Digitalisation. In March 2018, the OECD reported on "Tax Challenges Arising from Digitalisation". The OECD has identified blockchain as a threat to tax transparency and intends to manage taxation and transparency of blockchain transactions.

As to the preferred OECD method of taxation for digital businesses these three main approaches are being considered:

i) The **"User Participation"** approach. For businesses featuring user-created content, value is generated through user participation and as such should be taxed wherever the user is. This will demand a coordinated approach from authorities, and undermine the concept of "tax residence", thus limiting the use of low tax jurisdictions.

ii) The **"Marketing Intangibles"** proposal. Aimed at businesses with marketing functions in a jurisdiction where they have no physical presence. Profit would be taxable in the jurisdiction in which the marketing intangible (customer lists or similar data that aids sales) is held, further undermining the concept of tax residence.

iii) The **"significant economic presence"** proposal. Aimed at businesses with sustained interaction with an economy whilst remaining non-resident, the test will include, the operation of a website in a local language, collection of local currency, sustained marketing in a jurisdiction, and volume of digital content derived from a jurisdiction. Businesses meeting the test will incur liability in that jurisdiction. This departs from international taxation norms. The aim is to create a digital "Permanent Establishment" which will justify taxation on otherwise untaxable income attributable to that location.

Tax on base eroding payments. The OECD propose that expenses be non-deductible from payments where the receiver is taxed below a set level. This rule is to be complemented by a "subject to tax" rule which will disallow treaty benefits related to most types of income.

General Developments. The OECD will assist jurisdictions to update their laws and make systems more efficient. The OECD takes a more decentralised approach than the EU, as it seeks to change norms and establish frameworks, rather than implement direct proposals. Nonetheless. the requirements affecting Gibraltar will be no less radical.

If Gibraltar leaves the EU it will no longer be forced to comply with EU proposals, but the general direction of international tax compliance means business is increasingly challenging for international finance centres. Gibraltar has worked hard to achieve its reputation as a compliant and transparent jurisdiction, but as the OECD increases pressure to ensure that base erosion and profit shifting is eliminated, company administration in Gibraltar without actual local economic substance will become less relevant. Presence will need to be increased if tax planning is to be protected.

Conclusion

Remain or Leave, the future for international finance centres is uncertain. Gibraltar is uniquely placed with an educated workforce and access to the UK market to weather the storm. If Gibraltar Remains, it must implement OECD and EU proposals. If Gibraltar Leaves, it will suffer the consequences of the EU proposals but will not necessarily apply them, though it will almost inevitably implement OECD proposals.

The future is unknown, but a professional and transparent jurisdiction will thrive regardless. Uncertainty is what harms business, so whatever the result is, it must be resolved swiftly so that Gibraltar's professionals can get on with the task of building the future.

Crypto Funds: The Gibraltar Solution

The Gibraltar Funds and Investments Association (GFIA) hosted an event at The Traveller's Club, Pall Mall, London in June to discuss how Gibraltar is in a unique position for funds, despite the potential impacts of Brexit.

The event discussed how a significant majority of the funds established in Gibraltar operate outside of the scope of the European Union's Alternative Investment Fund Managers Directive (AIFMD), so should not be affected by Brexit. These funds will continue to operate and be promoted through the various National Private Placement Regimes (NPPR's) that exist in different European territories.

The panellists included, James Lasry, GFIA Chairman, Jay Gomez, GFIA Deputy Chairman, Jonathan Garcia, GFIA Board Member, Philip Young, Director, Gibraltar Stock Exchange, and Pavel Stehno, founder of Crypkit.

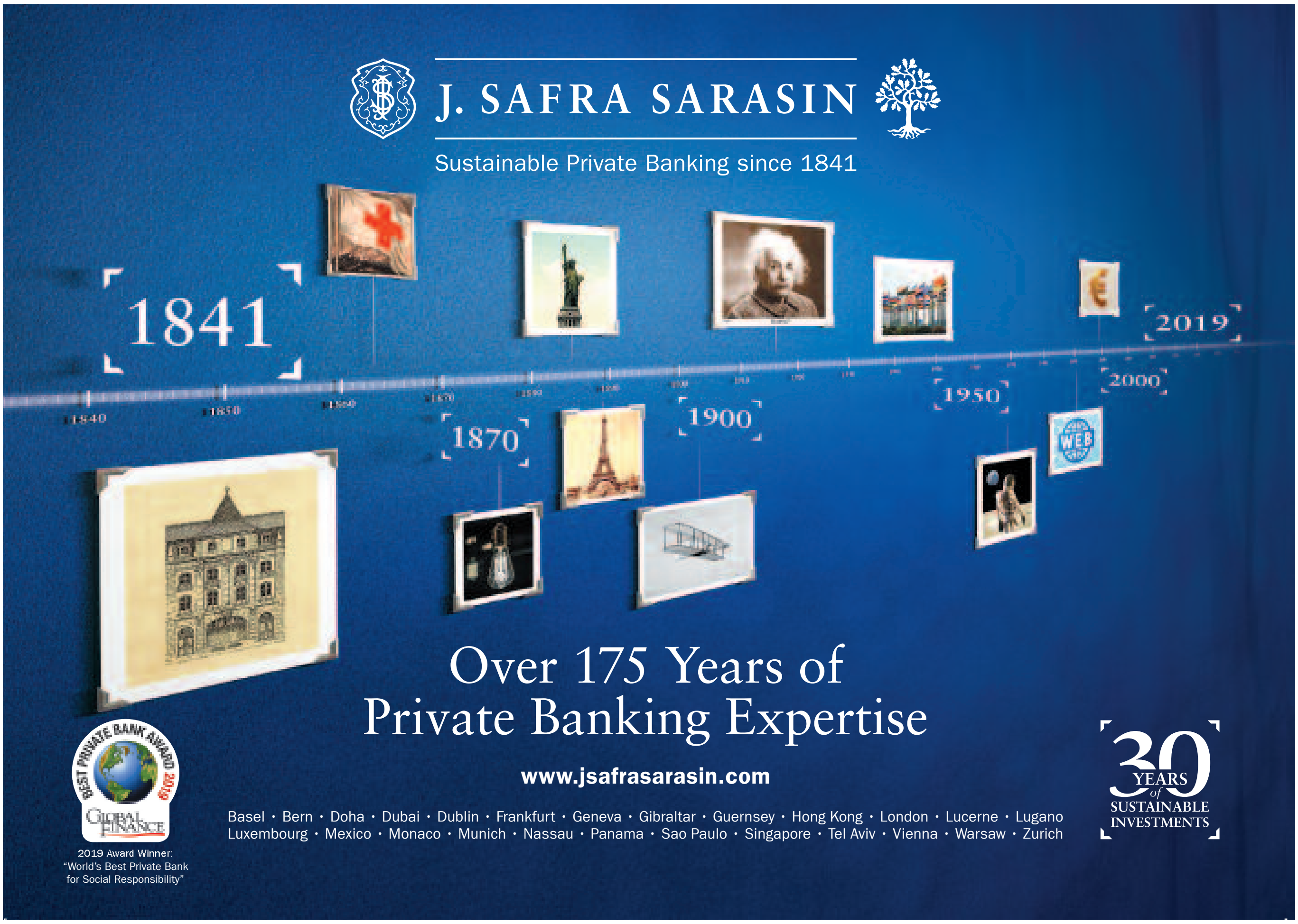
Jonathan Garcia, a partner in leading Gibraltar law firm, Isolas, commented: "The fact that this event proved popular and had a strong attendance is testament to the ongoing engagement and positivity of the funds industry as a whole. It is estimated that the significant majority of Gibraltar-based funds do not avail themselves of the European passport either because they fall below the threshold under which they are obliged to comply or fall within other exemptions and, as such, are unlikely to see any changes to their operations, both in terms of the way that they are managed, and the way that they can be promoted or distributed".

Further topics discussed were, how the UK-Gibraltar agreement ensures that Gibraltar will remain a regulatory certain gateway for financial service firms based in other jurisdictions to passport into the UK market, and new educational initiatives, including New Technologies in Education (NTiE), a programme developed by the Gibraltar government, in partnership with the University of Gibraltar.

www.gfia.gi

GFIA
GIBRALTAR FUNDS & INVESTMENTS ASSOCIATION


"We're bringing in BDO. The partner's already on it."
BDO Audit, Tax & Advisory
BDO provides audit, tax, and financial advisory services to businesses across the world. Our deep commitment to client service is matched only by our in-depth knowledge of the issues that affect both individual businesses and entire industries.
Contact Desiree McHard at desiree.mchard@bdo.gi (tel +350 20047300).
Audit | Accounting | Tax | Advisory
www.bdo.gi
BDO is the brand name for the BDO network and for each of the BDO Member Firms. © 2015 BDO. All rights reserved.
BDO


J. SAFRA SARASIN
Sustainable Private Banking since 1841
1841
1870
1900
1950
2000
2019
Over 175 Years of
Private Banking Expertise
www.jsafrasarasin.com
Basel · Bern · Doha · Dubai · Dublin · Frankfurt · Geneva · Gibraltar · Guernsey · Hong Kong · London · Lucerne · Lugano
Luxembourg · Mexico · Monaco · Munich · Nassau · Panama · Sao Paulo · Singapore · Tel Aviv · Vienna · Warsaw · Zurich
BEST PRIVATE BANK AWARD 2019
GLOBAL FINANCE
2019 Award Winner:
"World's Best Private Bank
for Social Responsibility"
30 YEARS of SUSTAINABLE INVESTMENTS

Professional Bodies based in Gibraltar

Association of Trust & Company Managers (ATCOM)
Joey Imossi, Chairman, Tel: + (350) 200 76651
Email: joey@fid.gi

Actuaries Rock
Kathryn Morgan, Chair, Tel: + (350) 200 40283
Email: katmorgan62@gmail.com

Bar Council
Keith Azopardi, Chairman, Tel: + (350) 200 79423
Email: ka@tsnlaw.com

Chartered Institute of Personnel & Development (CIPD)
Lesley Louise, Chairwoman, Tel: + (350) 54428000
Email: gibraltar@cipdbranch.co.uk

Gibraltar Association of Pension Fund Administrators (GAPFA)
Gerry Kelly, Chairman, Tel: + (350) 200 76173
Email: info@gibraltarapfa.com

Gibraltar Association of Compliance Officers (GACO)
Carlos M. Martins, Chairman, Tel: + (350) 2000 2022
Email: info@gaco.gi

Gibraltar Bankers Association (GBA)
Ainslie Andrews, President, Tel: + (350) 54001395
Email: ainslie.andrews@lloydsbank.gi

Gibraltar Betting & Gaming Association (GBGA)
Peter Howitt, Chief Executive, Tel: + (350) 200 68450
Email: info@gbga.gi

Gibraltar Chamber of Commerce (GCC)
Christian Hernandez, President, Tel: + (350) 200 78376
Email: info@gibraltarchamberofcommerce.com

Gibraltar Finance Centre Council (GFCC)
Peter Montegriffo, Chairman, Tel: + (350) 200 79000
Email: peter.montegriffo@hassans.gi

Gibraltar Federation of Small Businesses Ltd (GFSB)
Julian Byrne, Chairman, Tel: + (350) 200 47722
Email: gfsb@gfsb.gi

Gibraltar Funds & Investments Association (GFIA)
James Lasry, Chairman, Tel: + (350) 200 64740
Email: info@gfia

Gibraltar Insurance Association (GIA)
Liz Quinn, Chairwoman, Tel: + (350) 200 74570
Email: liz.quinn@quest.gi

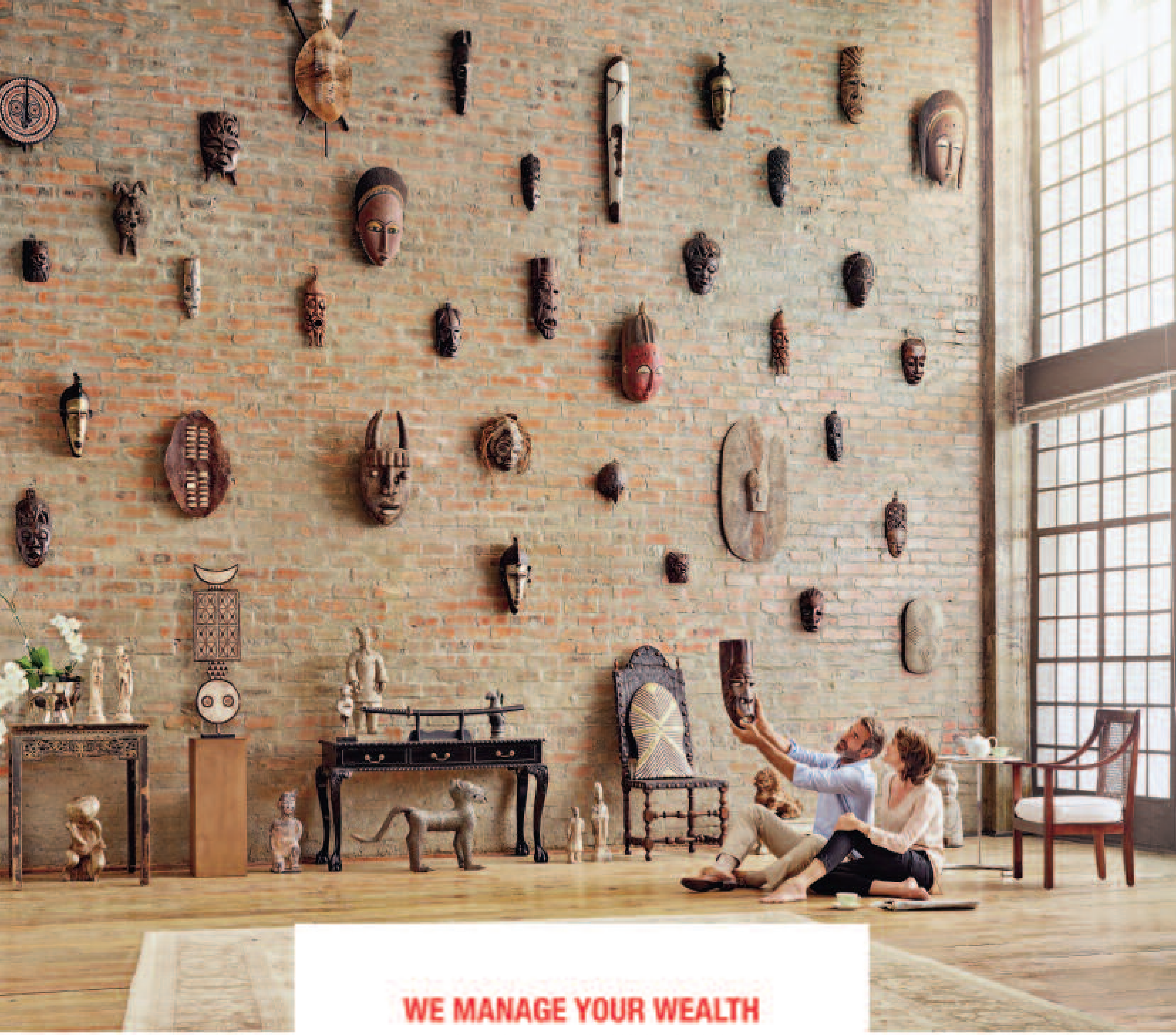
Gibraltar Insurance Institute (GII)
Lorraine Povedano, President, Tel: + (350) 54003732
Email: info@gii.gi

Gibraltar Society of Accountants (GSA)
Ian Collinson, President, Tel: + (350) 200 74015
Email: info@gibraltaraccountants.com

Gibraltar Electronic Money Association (GEMA)
Dani Spier, Chairman, Tel: + (350) 200 79645
Email: dspier@idtfinance.com

Society of Trust & Estate Practitioners (STEP)
Peter Isola, Chairman, Tel: + (350) 2000 1892
Email: peter.isola@isolas.gi

For all the latest Gibraltar business news visit www.gibraltarinternational.com



WE MANAGE YOUR WEALTH

SO YOU CAN ENJOY IT

Your Private Banker offers you bespoke solutions
to manage your wealth in a complex environment
so you have time for the important things in life.

kleinworthambros.com

KLEINWORT HAMBROS

SOCIETE GENERALE GROUP

BUILDING TEAM SPIRIT
TOGETHER