



## Brexit: now a non-event

It turns out that almost everything that has been said or written about Brexit's impact on the fund industry over the last two and a half years will turn out to be wrong. Even if there is no deal between the EU and UK it doesn't look like much will change, at least in the next two years.

Last month ADI reported that ESMA had decided to keep current delegation arrangements in place for the funds of UK managers, that are domiciled in EU jurisdictions like Ireland and Luxembourg. And now, more good news: EU jurisdictions have effectively agreed to give UK managers a 21-month grandfathering period, even if there is a No Deal Brexit.

For example, Dechert report that the Luxembourg government has proposed legislation, which would allow UK financial service providers to continue rendering certain services in Luxembourg for a period of up to 21 months after the date when the UK withdraws from the EU. This would allow UK-based AIFMs or UCITS management companies to continue to directly manage their existing Luxembourg funds following a 'hard' Brexit during this 21-month transitional period. *Continued on page 12 >>*

## EU blacklist announcement soon

The EU will announce what it will do with its threatened blacklist of offshore centres in March, a decision it postponed from February. Attention will be focused on what the EU says about the new substance rules that have been introduced in several offshore jurisdictions since the beginning of the year.

No one that ADI has spoken to expects Cayman, Guernsey or Jersey to be either blacklisted or whitelisted in March. And few expect that there will be any change in the BVI's status either. The consensus is that these jurisdictions will remain on the EU's so-called 'grey' list at least for the next 12 months. There are likely to be further investigations into their economic substance levels achieved before the EU either turns it thumb up, or indeed down, on these offshore centres.

The very earliest that the EU's Code of Conduct Group (CoCG) could start its investigations into the impact that these new substance rules might have had will be the spring of 2020. That is because the accounts for companies domiciled in these jurisdictions will be way that this is judged. There will be reporting requirements in company tax returns and audits will be carried out to review substance. *Continued on page 14 >>*

## In this issue

### Features

- 1 **Brexit: now a non-event**
- 1 **EU blacklist announcement soon**
- 8 **Public register postponement**
- 10 **What to do with AIFMD**
- 12 **Brexit: now a non-event**  
*Story continued from front page*
- 14 **EU blacklist announcement soon**  
*Story continued from front page*

### News

- 2 **Cayman prepares for a negative FATF assessment**
- 2 **Cayman issues substance guidance**
- 4 **More tax changes from the OECD**
- 5 **US 'concerned' with EU's approach to AML/CFT**
- 6 **Pierre Moscovici on tax evasion and avoidance**
- 7 **Fund governance research and events: the views of investors and managers**

### Listings

- 16 **AIFMD service providers**  
*AIFMD related Company listings*
- 17 **Domicile service provider listing**  
*Company listings by Domicile*

ADI is published monthly by IFI Global Ltd. Annual individual subscription is £340. Corporate rates are also available. No part of this publication may be distributed or reproduced in whole or in part without prior written permission from the publisher. All contents copyrighted. Visit <http://ifiglobal.com>

## ADI Subscription Form

### With your ADI subscription:

- 12 issues of the publication
- Attendance at ADI's events and roundtables
- Access to alternative managers' service provider search announcements
- Consultation for corporate subscribers in each of ADI's quarterly manager surveys
- Independent and unbiased expert analysis on domiciliation and fund trends at this most critical period in the history of the industry
- The only publication focussing on all the issues (fiscal and political as well as regulatory) that will have a fundamental impact on this business.

This form can be completed and saved in Acrobat Reader and then emailed to [Tamara Sims](#)

Name:

Company:

Address:

Email:

Tel:

Date:

An annual subscription to ADI is £340

An annual corporate subscription is £850

## Payment options

### Direct Transfer

HSBC Bank Plc  
Oxford Summertown Branch

Account: IFI Global Ltd  
Bank Account No: 41444530  
Sort Code: 40-35-35  
IBAN: GB95HBUK40353541444530  
SWIFTBIC: HBUKGB4B

### By Cheque (£ Sterling only)

Make cheque payable to:  
IFI Global Ltd.  
10 Arthur Street  
London EC4R 9AY

For additional information please contact Tamara Sims at [sims@ifiglobal.com](mailto:sims@ifiglobal.com)

IFI Global Ltd, 10 Arthur Street, London EC4R 9AY Tel: +44 (0) 207 220 9077

ADI is published by IFI Global Ltd, 10 Arthur Street, London EC4R 9AY Tel: +44(0)207 220 9077

Editorial & research enquiries:  
**Simon Osborn** e-mail: [osborn@ifiglobal.com](mailto:osborn@ifiglobal.com)

Directory, event and subscription enquiries:  
**Tamara Sims** e-mail: [sims@ifiglobal.com](mailto:sims@ifiglobal.com)

IFI Global Ltd. Registered Office: Greyfriars Court Paradise Square Oxford OX1 1BE Registered in England: No.7648308