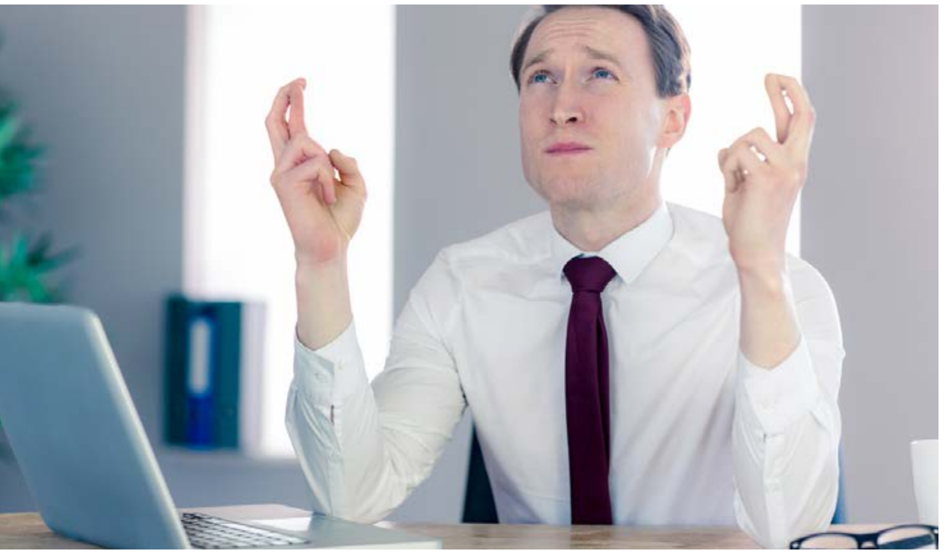
Brexit… prepare for the worst and hope for the best

TAM Asset Management provides an overview.

We await with bated breath, the last-minute negotiations between the UK and Europe as to how, if, and by what means, business in the Eurozone may be conducted with counterparties from the UK. The bizarre, no-one really knows situation, has resulted in multiple statements from the UK regulator and commentators.



Olivier Fines, head of advocacy for EMEA at the CFA Institute: "In the case of a no-deal Brexit and no regime of equivalence or memorandum of understanding in place between regulators, by definition, the passports under MIFID, UCITS or AIFMD would cease to operate. This would immediately have two sorts of consequences, UK-based investment funds (Oeics, trusts) would no longer be able to be recognised and marketed into the EU. Second, EU-domiciled funds could no longer delegate investment management to UK-based asset managers. This is what is at stake."

Confidence in a solution that allows equivalency to some degree is meekly anticipated, but in what form and how will it affect the financial landscape is murky. Clarity is required and I know that FEIFA is on top of its information to members. It's difficult to solve a problem if you don't have the question? The extent of the problems impact is still not obvious; however, the solution is as clear as a well-cut diamond. **Prepare for the worst and hope for the best!**

Since the early 80's regulation has become an integral part of working in the financial sector, with legislation and guidance abundantly introduced and reinforced. Regulation by stringent and diligent authorities on the one hand shows customers that they are treated fairly, and trading operates within important market rules. European regulatory development can also add a strain to existing business relationships. Brexit is not the only significant change. MiFID II was rolled out to further protect trading practices and client's interests and increase the scope of transparency. This is the set of guidelines European regulators are using to govern companies through regulatory change. Little interest has been taken by the regulators to check implementation yet. This will follow and should not be underestimated.

MiFID has some interesting nuances and opens new areas in which advisers can delve (ESG for one) and professionalises the market further. Brexit could on the other hand turn out to be a nasty wake up call for those thinking "equivalency" is nailed on. Recently we hear of bank accounts in the UK for UK expats in Europe being withdrawn…that's drastic and smacks of preparing for the worst and hoping for the best!

If there is indeed a hard Brexit it creates the very real possibility that:

- Advisers in the UK may not be able to maintain their relationship with EU clients (other than when they visit the UK).
- DFMs in the UK may not be able to use passporting rights to manage EU client assets.
- And, hot off the press….UK bank accounts are withdrawn for expatriates in Europe.

The financial landscape is changing…. MIFiD II is interesting, Brexit could be a shocker.

For further information contact Tom Worthington **– tom.worthington@tameurope.com** or tel: **+34 (0)688 988 686**.

Sustainable investments: making it real

An insight from Bedford Row Capital.

Sustainable investing is in the trade press nearly every day. Companies are promoting their credentials and institutions are claiming to have the best team or most sustainable products.

The UN Sustainable Development Goals (SDGs) were published in 2015[1]. In the same year, I remember meeting Sean Kidney to discuss the Climate Bonds Initiative. Now ratings, sustainable baskets, indices, funds and research teams are proliferating. Does this mean with all this information we have a clear picture of what we should or could be doing or does it make it more confusing?

Professor Kevin Haines is Head of Social Policy for Bedford Row Capital PLC; he recently left academia to bring his research and social policy development skills to help us navigate the various themes. His initial insights into the current situation provide a useful framework for advisers who are considering developing thematic solutions for their clients or are being asked by their clients as to how to "do some good" with their investments.

Kevin's initial thoughts are:

Entering into the world of ESG is like opening Pandora's box. Any newcomer, or indeed seasoned professional, is confronted by a plethora of standards purporting to be effective measures of E, S or G – or all three. At the same time, one is left knowing that none of these standards actually provides the answers to the specific circumstances one is dealing with. This is not entirely surprising given the potentially endless list of variables that can have a bearing on any company's ESG rating. The 17 UN SDGs, for example, have some 197 variables that may be accounted for. This pales into insignificance, however, when one takes a 'big data' approach: here potentially thousands (or hundreds of thousands) of variables can be accounted for. It's no wonder, therefore, that there is an absence of an agreed 'standard' and a degree of uncertainty as to the best path to follow.

Companies offering to provide ESG ratings to customers are yet nascent. The bigger companies appear to be going down the road of big data – and using AI to analyse the data and draw conclusions. There are some potential advantages to his approach (its comprehensive scraping of vast amounts of data), but there are also some serious limitations – two main ones being the absence of causality in correlational analysis and the sheer complexity of understanding the outputs. It may well be that these issues are overcome in time, as companies become more proficient in these matters, in the meantime, however, we are largely utilising assessments of ESG that are based on a more limited range of criteria. Indeed, this may well prove to be the future of ESG related assessments as the needs/requirements of different industries vary considerably. One size, it seems, does not fit all.

Is the search for a universal measure of ESG futile? Can big data (however sophisticated the analysis becomes) really produce meaningful real-world output? Are the UN's SDGs an effective measure of ESG across many different sectors? Should we, instead, agree on a single measure for E, S and G (for example, E could be carbon emissions, S could be income differential and G could be an effective independent Board of Governors)? This approach, at least, would be cheap and easy to understand. It is unlikely, however, to satisfice.

Whatever approach emerges as the one most favoured, we are still confronted with a significant problem. We may, in time, come to some agreement as to what should be measured but the next big question is: how do we measure all of these things? But, it is not just a matter of how do we measure these things, it is how do we measure them economically, efficiently and effectively? Then how do we analyse these things (being reasonably confident about causality) and produce output that is readily understandable?

We are a long way from providing good answers to these questions. For the moment, the important thing is that we are on a journey, individually and collectively, towards answering these questions.

The admission of Sustainable Capital plc to the NASDAQ Sustainable Bond Network is part of BRC's ESG compliant investment platform. As market leaders in our field we are developing a growing competence and confidence in our approach which will include ESG traffic light system for future issuances to assist advisers in understanding and providing a clear path for their clients' investment objectives.

If you would like to talk to us about our approach please contact **Kevin.haines@bedfordrowcapital.com**

For more information on Sustainable Capital PLC, email: **ir@sustainablecapitalplc.com** or Global Head of Business Development Chris Kruecken (**chris@bedfordrowcapital.com**)

[1] *https://www.un.org/sustainabledevelopment/sustainable-development-goals/*