

A woman with curly hair is holding a tablet and showing it to a man in a blue shirt. They are in an office at night, with computer monitors and papers visible in the background. The woman is wearing a grey sweater over a plaid shirt. The man is wearing a blue button-down shirt. The scene is dimly lit, with light coming from the screens and some ambient office lights.

# PwC Ireland AWM Regulatory Advisory services

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Overview



## Foreword

Ken Owens, PwC AWM Regulatory Advisory Partner

Dear Clients and Readers,

Over the past number of years the regulatory landscape for Asset Managers and Management Companies in Ireland has seen major changes, including regulatory structural reforms due to CP86, climate change, ESG/Sustainability and the effects of post-Brexit regulatory divergence.

From speaking to our clients over the last number of years we have noticed a real focus on making sure that the internal regulatory frameworks within their organisations are fit for purpose and up to market standards. You will discover in this brochure the key services that we as a team provide for our clients from a regulatory perspective.

The PwC Asset Management Regulatory Advisory team has a proven track record in the asset management sector and we are motivated to make a difference and help your organisation succeed. Our team of regulatory experts have worked with a range of Asset Managers, Fund Administrators, Depositaries and Management Companies and we will provide practical, hands-on experience to support the key stakeholders within your organisation whilst leveraging our PwC network and methodologies.

For my part, I will ensure that you receive the very best of PwC: our people, our thinking and our extensive technical resources.

Enjoy the reading and I look forward to speaking to you on any of the areas discussed in this brochure.

Ken Owens

Partner, PwC Ireland



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CP86 review



# CP86 review

## Why PwC?

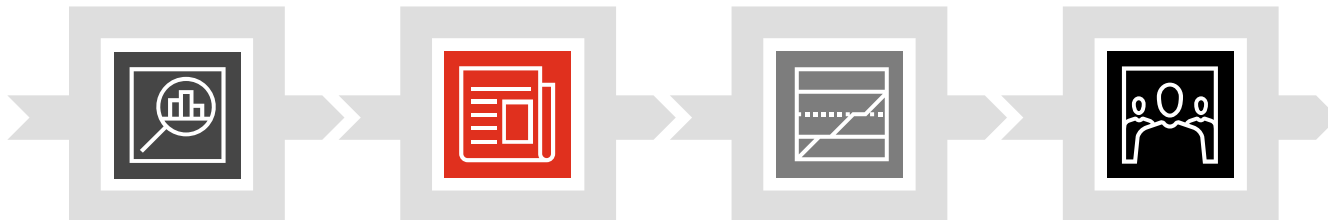
We have extensive experience of conducting CP86 reviews and supporting firms in ensuring compliance with relevant regulations/guidance.

We have in depth insights of the Central Bank of Ireland's (CBI's) expectations of funds and management companies.

We have a deep understanding of the key challenges that firms face in this space and the factors that determine what 'good' looks like.

We have conducted a number of CP86 compliance reviews, including reviewing/drafting policies and procedures and performing an assessment of reporting frameworks and delegate oversight procedures.

## Overview of services



### Regulation Gap Analysis

- ✓ Documentation review
- ✓ Full gap analysis
- ✓ Best practice market insights
- ✓ Stakeholder interviews
- ✓ Develop implementation plan
- ✓ CP86 client workshops

### Policy and procedures

- ✓ Review of policies and procedures and drafting of template policies and procedures in areas such as outsourcing, delegate oversight, AML, valuation
- ✓ Framework reviews for the Management Company

### Governance review

- ✓ Detailed review of governance arrangements including:
  - Board packs and minutes
  - Attendance at board meetings
  - Board Terms of Reference
  - Board evaluation process

### Designated persons

- ✓ Review of the role of the Designated Persons including:
  - OE Director review
  - Role descriptions
  - DP report review
  - Board reporting





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# Regulatory reviews



# Regulatory reviews

## Product governance

Our team can provide an end to end review of your product governance framework to identify where there are gaps with regulatory requirements and industry best practice.

## Risk management framework

Review of:

- ✓ Risk management framework
- ✓ Risk management policy
- ✓ Risk appetite statement
- ✓ Risk register
- ✓ Risk incident log
- ✓ Alignment of framework with current policies and procedures

## IFD/IFR support

- ✓ Gap analysis review of the IFD/IFR regulations
- ✓ Advising on reporting and disclosure requirements
- ✓ Own Funds
- ✓ Liquidity
- ✓ K-Factor assessment and calculation
- ✓ Remuneration standards
- ✓ Implementation programme review
- ✓ IFD/IFR regulatory workshops

## Capital framework

We can perform a review of the Company's draft capital plan, ICAAP and Capital Policy in line with the CBI and EBA guidelines and expectations.

Our review will address the following requirements

- ✓ The minimum capital requirements (MCR) review
- ✓ Recommendations regarding the layout and content of the draft capital management framework
- ✓ Internal Capital Adequacy Assessment Process (ICAAP) review
- ✓ Drafting of the full Capital Management Framework if required

## Corporate governance

- ✓ Content of board packs and board minutes;
- ✓ Structure of the board meetings;
- ✓ The need for sub-committees of the board;
- ✓ Organisational effectiveness report and process.
- ✓ Organisational effectiveness director review
- ✓ Board composition/review of board evaluations; and
- ✓ Letters of appointment and time commitments for both directors and designated persons.

## Internal audit

- ✓ We can provide the full internal audit function for your organisation
- ✓ We have helped many clients with their own internal audit reviews on several regulatory functions





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## Regulatory reporting

# AIFMD - Regulatory reporting

## AIFMD - Alternative Investment Funds Managers Directive (AIFMD) 2011/61/EU

'AIFMD' refers collectively to the Alternative Investment Funds Managers Directive (Directive 2011/61/EU)

The Directive 2011/61/EU was transposed into Irish law in July 2013 under the European Union (Alternative Investment Fund Managers) Regulations 2013 (the AIFM Regulations)

AIFMs have the duty to report on their activities to National Competent Authority where they are domiciled in compliance with the requirements set out by the ESMA.

### AIFM Reporting

All EU AIFM or managing AIF marketed in the EU.

### AIF Reporting

Article. 24.1 Report: All AIFs managed by EU AIFM and/or EU AIFs and/or marketed in the EU.

Article. 24.2 Report: Every EU AIF and/or every AIF marketed in the EU.

Article 24.4 Report: Highly leveraged AIFs.

### Future Regulations - (Coming in 6-18 months)

- PRIIPS
- SFDR
- MMSR
- MMFR

## PwC's scope of service offerings

### 1 Identifying contents & Frequency of AIFMD Annex IV Reporting

Scope of knowledge / objects to be transferred:

- Identifying if the fund covers AIF 1, AIF 2 or AIF 4 for highly leveraged AIFs and AIFM
- Identify the required filing obligations:
  - Annual
  - Semi Annual
  - Quarterly filing

### 2 Data Integration and Validation

Key data points are identified, compiled and validated according to the requirements.

- Data collected from various sources including Fund Admins , Investor services, Fund Risk Management
- Analysed and interpreted in specific formats accepted by regulatory authorities

### 3 Classification and Calculation

According to each fund type structure and fund strategy

- Data is classified into various categories
- Key data points are calculated and classified including NAV, AuM, Risk, Liquidity and Leverage

### 4 Generating reports within Regulator Standards

Ability to generate aggregates and produce standardised reports in various formats

- XML
- Excel / PDF
- Comparison file
- Validation
- End to end Audit trail

### 5 Creation of Submission Reports to Authorities

Functionality to perform automated checks and reviews

- Provide guidance and assistance on filings
- Creation of final submission file for respective national competent authority



# AIFMD - Regulatory reporting (Q3 2023)

## Why PwC?

- One centralised data hub for all data providing consistent reporting across all regulations (starting with AIFMD)
- Personalised reports for each client providing drill down information for accuracy and review
- Relationships with all main fund administrators and management companies in Ireland, many with existing data linkages
- Provide an end to end audit trail, including timestamp, which will provide evidence of all work completed and submitted to the relevant regulatory authority
- Access to PwC's team of regulatory specialists who understand regulatory frameworks and can discuss market and regulatory updates, and their potential impact on your business

## Future Regulatory Reporting Offerings

PRIIPS

SFDR

MMSR

MMFR

MiFIR







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# 5 Valuation reviews





# Valuation reviews

## Valuation framework

**PwC can assist clients in a number of different ways best tailored to your valuation needs.**

We have designed a valuation framework suitable for Irish management companies based on current regulations and industry best practices which includes the following areas:

**Fair value of investments** – covering an assessment of valuation risks, valuation methodologies, pricing services, and policies & procedures

**Fair value determinations** – which deals with Board oversight, Board reporting, and the specification of functions responsible for determining the fair value of investments and their respective responsibilities

**Recordkeeping** – which addresses the maintenance of appropriate documentation to support valuations undertaken.

## Valuation audit approach

We have also developed a tried and tested valuation audit approach which is:

- ✓ Focused and risk orientated
- ✓ Uses advanced digitalisation and automation
- ✓ Experience of dealing with global investments in the development of tools and our valuation competence
- ✓ Efficient process audit and independent revaluation of your portfolios
- ✓ Transparent and reliable results, and material deviations discussed with you.

## Valuation advisory services

We perform valuations of illiquid assets in four areas:

### 1 Financial reporting

- ✓ Business combinations (tangible and intangible assets)
- ✓ Impairment of assets
- ✓ Share based payments
- ✓ Incremental borrowing rates

### 2 Transactions

- ✓ Acquisition/disposal valuation advice
- ✓ Independent or 'fairness' opinions
- ✓ Financial forecasting and data modelling
- ✓ Valuation support for debt / equity raising
- ✓ Valuation and modelling for restructuring

### 3 Dispute resolution

- ✓ Independent expert/expert witness
- ✓ Shareholder disputes
- ✓ Litigation support
- ✓ Mediation and arbitration support

### 4 Tax valuations

- ✓ Corporate reorganisations
- ✓ Transfers of private investments
- ✓ IP relocation
- ✓ Unquoted shares
- ✓ Debt instruments
- ✓ Incentive and growth shares





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# 6 Outsourcing





# Outsourcing

Our outsourcing services include a wide range of bespoke services, typically in the areas of Regulatory Compliance; Risk Management; and Operations:

- ✓ Outsourcing framework - Diagnostic, design & implementation
- ✓ Outsourcing Maturity assessment
- ✓ Outsourcing benchmarking
- ✓ Outsourcing process enhancement
- ✓ Outsourcing Risk Assessment
- ✓ Individual Outsourcing arrangement support – design, deployment, implementation
- ✓ Regulatory compliance
- ✓ Internal audit support

## Key Activities

- **Review of inscope outsourcing materials** (list of documents to be requested in advance) to gain an initial understanding of the current outsourcing policies and inscope processes in place
- Hold meetings/workshops with management to **validate our understanding** of in-scope outsourcing risk practices
- During this stage, we will begin to **draw conclusions** based on our experience and knowledge of outsourcing and how desired state process may be tailored to suit your requirements

## Outcomes

- ✓ Documentation of workshop outcomes
- ✓ Preliminary views on outsourcing current state

## Analyse

## Review and Recommend

## Report

- **Complete a detailed regulatory mapping** exercise. We will deploy our Outsourcing Regulatory Toolkit to support this process
- Utilising PwC's leading practice Outsourcing Risk Management Review Framework, Outsourcing Risk Management Maturity Model, Outsourcing 3LOD benchmarking model; and other tools, we will complete a **comprehensive benchmarking** exercise
- The results of the benchmarking analysis will be combined with the regulatory mapping exercise to form the **current state assessment** which will contain details of all identified gaps, areas for improvement and related recommendations. This analysis will incorporate regulatory requirements, together with operational effectiveness optimisation
- Socialise the current state assessment with management for **discussion and validation**
- **Finalise the current state assessment** which will form the basis of findings and next steps to ascertain "Desired State" requirements

- Agree outline and coverage of draft review and recommend report with management
- **Document our report** setting out detailed outputs from our updated current state assessment, together with our recommendations on how to address the gaps and enhance the areas reviewed
- **Present a summary of our observations** to management and the Board as necessary

- ✓ Detailed regulatory mapping depicting current state against regulatory requirements
- ✓ Comprehensive current state assessment, setting out any areas of potential regulatory challenge

- ✓ Detailed report setting out findings and recommendations

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# Liquidity risk

# Liquidity risk

- Liquidity risk in investment funds remains a key regulatory and supervisory priority
- PwC has a team of Liquidity Risk experts to help solve the key challenges faced by Fund Managers and Management companies
- We have extensive experience in the review of Liquidity Risk policies and procedures with regard to the new guidelines from ESMA







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# Central Bank of Ireland (CBI) authorisation services



# CBI authorisation services and our credentials

## CBI authorisation services

We have invested heavily in the authorisation space and are well placed to support you.

PwC has market leading industry knowledge and technical expertise across all the areas you require support (regulatory, governance, financial projections etc).

Our authorisation team is drawn from our AWM and FS Regulatory practices and includes regulatory specialists who have considerable experience in all aspects of the authorisation process.

Our team can bring their insights and extensive practical experience from ongoing and recently completed authorisation projects across our diverse client base.

## Our credentials

- We have unrivalled experience in supporting multiple organisations with their authorisation programmes
- In the last number of years we have held the pen in successful authorisation projects as well as assisting and advising clients throughout the end to end authorisation process
- We provided regulatory assistance to a European research brokerage firm in obtaining authorisation as a MiFID investment firm in Ireland as part of their Brexit strategy
- We seconded staff in order to project manage the regulatory authorisation of a MTF under the MiFID Regulations
- PwC provided end to end assistance to a fund service provider with their authorisation as a Fund Administrator in Ireland
- PwC supported an international firm with their electronic money institution authorisation which involved the development and documenting of the key elements of the authorisation application, assessing associated application documentation, providing project management support and advising on communications with the CBI



# Regulatory assistance with CBI authorisation process

- We can work in **collaboration with your legal advisors and your internal project team**.
- We can **review** all relevant application documentation and provide our comments and **recommendations** thereon.
- We can provide **regulatory and compliance guidance** as required throughout the authorisation process.

Stages	1 Key Facts Document (KFD)	2 Application Form	3 Financial Projections	4 Policies and Procedures	5 Compliance Monitoring & Risk Management Frameworks	6 CBI Comments
Activities	<ul style="list-style-type: none"><li>• Review draft KFD against CBI's regulatory requirements and good industry practice</li><li>• We can assist you with your preparations for the preliminary meeting with the CBI</li></ul>	<p>We can review and provide recommendations on the:</p> <ul style="list-style-type: none"><li>• Draft Business Plan</li><li>• Draft Application Form and supporting documentation</li><li>• The Individual Questionnaires for all PCFs</li></ul>	<p>We can review and provide recommendations on the:</p> <ul style="list-style-type: none"><li>• Draft 3 year financial projections</li><li>• Proposed own funds requirement and</li><li>• Structure of Minimum Capital Requirement in accordance with the CBI requirements</li></ul>	<ul style="list-style-type: none"><li>• Gap analysis of the existing draft/group policies and procedures</li></ul>	<ul style="list-style-type: none"><li>• Review the Group level Compliance Monitoring and Risk Management Frameworks</li></ul>	<ul style="list-style-type: none"><li>• Review your draft responses to questions and requests for clarifications from the CBI</li><li>• We can review and provide recommendations on any proposed updates to documentation made in response to CBI comments</li></ul>





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# 9 Environmental, Social and Governance (ESG) services



# Supporting your ESG journey

As the investor preference and regulatory landscape continues to change and evolve, there is no doubt that this will have a significant impact on asset managers, management companies, distributors, financial advisors and the financial products which are offered. This is the time to align your strategy, transform your business and focus on the transparency and granularity of reporting. The timeframe for many of these regulatory changes is short. The need to address and meet investor preferences is ongoing and will continue into the future.

Those who are nimble, agile, innovative, credible and transparent will become market leaders.

**ESG is more than ticking boxes. It's about making a difference - for your business and our world. Creating sustained outcomes that drive value and fuel growth, whilst strengthening our environment and societies.**

## Strategy

We can help you define your strategy, make the right choices to define your tomorrow.

## Data

It is widely acknowledged that data is one of the most significant challenges which is faced in the industry. Let us help you ensure your ESG data is credible, transparent and fit for purpose.

## Training

We can deliver tailored training courses to help you to understand your regulatory obligations under ESG related legislation.

## Transformation

We can help ensure your business is transformed and aligned to your overall strategy - both at an entity and financial product level.

## Reporting

We can assist in your external and internal reporting requirements, including SFDR, EU Taxonomy and other ESG regulations. Ensuring you meet your regulatory and other stakeholder needs and obligations.

## Health check

From readiness assessments to regulatory gap analysis to impact measurement to data requirements. Our health checks are designed to help you meet this quickly evolving landscape.

## Implementation

From the implementation of your ESG strategy into your processes, portfolio analysis, data requirements, due diligence and risk management procedures we can help.

## Tax governance

We can perform a detailed review of global tax control frameworks to ensure global compliance with tax laws and regulations, increase your tax transparency to investors and demonstrate tax contribution on a jurisdictional basis.

## Tax restructuring

We can help you establish tax efficient fund structures which are suitable for ESG investments and also avail of the tax reliefs and incentives for investments in ESG assets.



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## Anti-Money Laundering & Countering the Financing of Terrorism (AML & CFT)





# AML & CFT

## Why PwC?

**Preventing and detecting suspicious activity and financial crime is rapidly becoming one of the greatest challenges for financial institutions - with huge potential impact on reputation, brand and relationships as well as monetary losses.**

PwC offers a depth and breadth of insights and access to networks that we can bring to our clients. Both in Ireland and internationally, we have an unrivalled client base that allows us to identify and share developing trends and issues in this complex and changing area.

Our team of experts and our experience makes us the right team for you.

## Services overview

### AML framework

- We can help to design, or review your existing AML framework, to ensure that it is in line with CBI guidelines, and best practice, including a review of outsourcing arrangements.

### AML / CFT Regulation Health Check

- We can review documentation and perform a health check and gap analysis of AML processes against regulatory requirements and best practices.

### Policies and procedures

- We can review policies and procedures, or assist in the drafting of policies in line with CBI guidelines.

### Training

- We can deliver tailored training courses to help you to understand your regulatory obligations under Irish and EU legislation and CBI guidelines.

### AML remediation

- We can assist clients in AML remediation projects, including the development and implementation of updated internal processes and controls.

### AML internal audit

- We can provide internal audit services in respect of AML / CFT procedures.





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## Training



# Training

## Why PwC?

**We have extensive experience of designing and delivering training courses tailored to the individual needs of your organisation, covering a wide range of regulations/areas.**

We have delivered a wide variety of training courses to clients including the Board and employees of investment firms, management companies and other fund service providers.

We have delivered tailored courses covering both Irish and international regulation. By drawing on both our Irish experts, and the support of our extensive PwC network, we can provide specialist knowledge and insight into a wide range of regulations, and across the Asset and Wealth Management industry.

.....

We have provided tailored training courses to help clients to understand their obligations under a large variety of regulations including CP86, CP138, UCITS, AIFM, MiFID, ESG and AML.

.....

We have designed training courses in areas such as AML and fraud awareness, to assist clients in the provision of their annual employee / Board training.

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### Regulatory obligations



### Interview preparation and workshops



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We have assisted clients with preparing for interviews with regulators etc. We have also facilitated workshops for clients covering many regulatory areas, including ESG, fraud awareness, ManCo / fund / investment firm regulations.

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02

03

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### Annual training



### Regulatory updates

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We have provided tailored monthly / quarterly regulatory update calls for clients covering regulatory updates relevant to their business. We also produce a regulatory update brochure on a quarterly basis - please see our website for further information.

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