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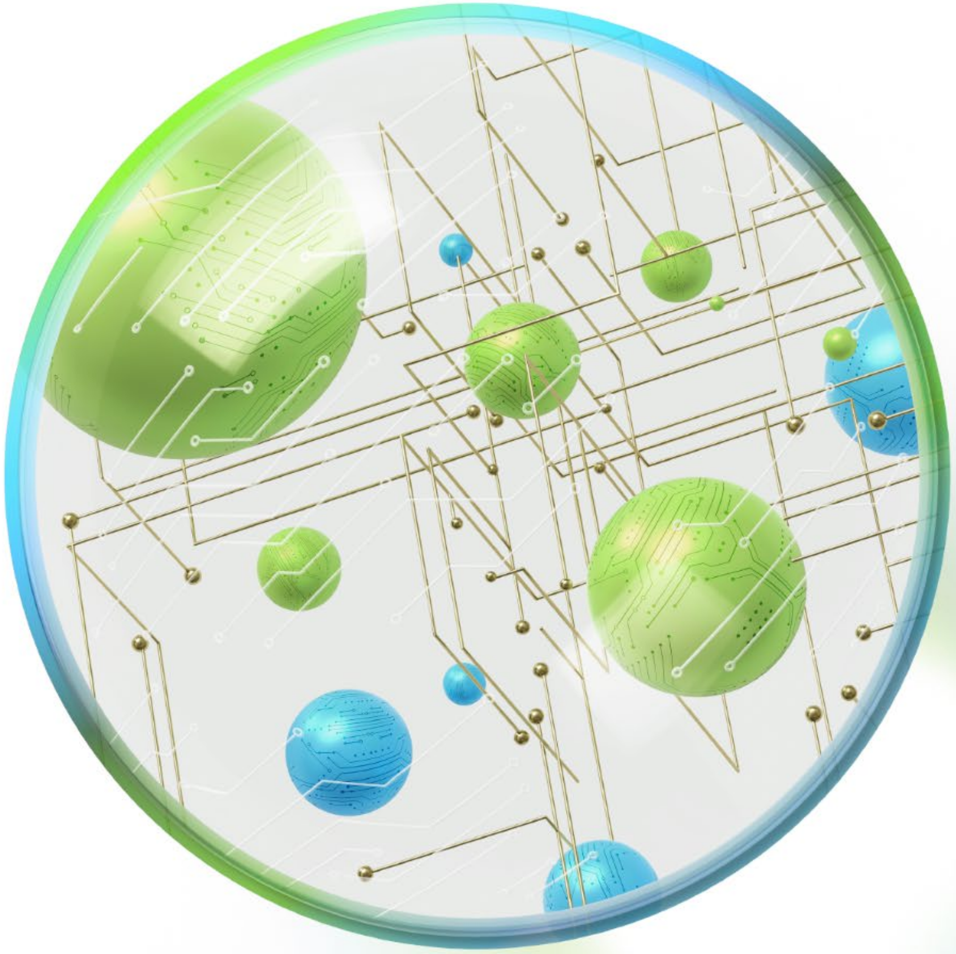


Deloitte Cayman Islands Technical Brief for Investment Funds

Accounting, Auditing and Regulatory

February 2022

MAKING AN IMPACT THAT MATTERS since 1845

In this issue

Introduction

The Technical Brief for Investment Funds ("Tech Brief") is an annual newsletter developed by the Deloitte Cayman Islands Investment Funds Technical Team.

From a Cayman Islands funds perspective, 2021 was a very busy year for all industry players, as several thousand additional investment funds were brought into the Cayman Islands investment funds regulatory regime as a result of the enactment in 2020 of the Cayman Islands Private Funds Act and amendments to the Cayman Islands Mutual Funds Act. Growth in Cayman Islands funds remained strong in 2021. At the end of December 2021, there were approximately 12,700 investment funds regulated under the Mutual Funds Act and 14,700 regulated under the Private Funds Act, representing an approximate 7% and 15% increase, respectively, from December 2020.

From an accounting and financial reporting standpoint, over the past year, there have been a limited number of updates to United States and International Accounting Standards that will affect investment managers and/or investment funds. In this Tech Brief, we will summarize some of the more applicable new and upcoming accounting and financial reporting standards that investment funds and their managers may have to contend with.

The auditors report for audits conducted in accordance with United States Generally Accepted Auditing Standards has been amended and reformatted. We have summarized some of the changes users can expect to see commencing with December 2021 year ends.

On the regulatory front, we have provided some updates to various Cayman Islands regulations and laws that may directly or indirectly affect the investment funds industry.

Finally, we have summarized some considerations in relation to fund liquidations in the Cayman Islands. We have also included an example on how a liquidator can add value where a fund manager is seeking an orderly wind down in circumstances where remaining assets have become impaired.

FASB and IASB Joint Projects

Leases

Introduction

The leases project began as a joint project between the FASB and the IASB culminating with the issuance of ASU 2016-02, Leases (Topic 842) in 2016, which amended US GAAP with the creation of Topic 842, and IFRS 16 in 2016, which replaces IAS 17. Many of the new requirements are the same in ASU 2016-02 and IFRS 16; however, there are a number of differences between US GAAP and IFRS in the final standards, particularly in relation to certain aspects of the lessee accounting model (see below). The main changes from the previous standards is the requirement, with some limited exceptions, to recognize all leases on the balance sheet (i.e. the removal of off-balance sheet leases) and the definition of what constitutes a lease. Accounting by lessors remains substantially unchanged from the previous standards. Further, in March 2019, the FASB issued ASU 2019-01, Leases (Topics 842): Codification Improvements, which amends certain aspects of ASU 2016-02 and instates an exception for entities who are not manufacturers or dealers in regard to the fair value of the underlying asset at lease commencement, as discussed further below. Also in May 2021, the FASB issued ASU 2021-05*,* Leases (Topics 842): Lessors—Certain Leases with Variable Lease Payments, which clarifies that lessors should classify and account for a lease with variable lease payments that do not depend on a reference index or a rate as an operating lease. When a lease is classified as operating, the lessor does not recognize a net investment in the lease, does not derecognize the underlying asset, and, therefore, does not recognize a selling profit or loss. The leased asset continues to be subject to the measurement and impairment requirements under other applicable US GAAP standards.

While the updated guidance will not likely have an effect on investment funds, investment managers may be impacted to the extent they have leased assets that were previously accounted for under the guidance for operating leases (and thus not reported on the balance sheet). Under the new guidance, the rights and obligations associated with most of these leases will be recognized on the balance sheet. The income statement will be impacted as well but to a lesser extent.

Status—US GAAP

The US GAAP amendments in ASU 2016-02 and in ASU 2019-01 were effective for public entities for fiscal years beginning after December 15, 2018, and interim periods within those fiscal years. For all other entities, ASU 2020-05 deferred the original effective date by two years and as such, the amendments are effective for fiscal years beginning after December 15, 2021, and interim periods within fiscal years beginning after December 15, 2022. Earlier application is permitted.

The US GAAP amendments in ASU 2021-05 amend Topic 842, which has different effective dates for public business entities and most entities other than public business entities. The amendments are effective for fiscal years beginning after December 15, 2021, for all entities, and interim periods within those fiscal years for public business entities and interim periods within fiscal years beginning after December 15, 2022, for all other entities.

Status—IFRS

IFRS 16, Leases, was effective for annual reporting periods beginning on or after January 1, 2019.

Summary

Balance sheet recognition of all leases: The main change between previous US GAAP and ASU 2016-02 is the requirement for lessees to recognize operating leases on their balance sheet. Both US GAAP and IFRS now require the recognition of substantially all lease assets and lease liabilities on the balance sheet, with the exception of short-term leases (i.e., those with a lease term of 12 months or less), and, in the case of IFRS, leases of assets with values of less than $5,000. Certain disclosures of key information about leasing arrangements have also been amended. Under the new guidance, a lessee would record a right-of-use ("ROU") asset representing its right to use the underlying asset during the lease term and a corresponding lease liability.

Definition of a lease: ASU 2016-02 and IFRS 16 diverge somewhat in the definition of what constitutes a lease. Under US GAAP, ASU 2016-02 defines a lease as a "contract, or part of a contract, that conveys the right to control the use of identified property, plant, and equipment (an identified asset) for a period of time in exchange for consideration". Under IFRS 16, "a contract is, or contains, a lease if it conveys the right to control the use of an identified asset for a period of time in exchange for consideration". In both cases, control is conveyed where the customer has both the right to direct the identified asset's use and to obtain substantially all the economic benefits from that use. An asset is typically identified by being explicitly specified in a contract, but an asset can also be identified by being implicitly specified at the time it is made available for use by the customer.

While these separate definitions under US GAAP and IFRS may seem straightforward, judgment is crucial to identifying a complete population of leases. At first glance, a contract may not seem to meet a conventional understanding of a lease. In preparation for the application of the new standard, investment managers should evaluate each of their contracts to determine their complete population that falls within the definition of a lease.

Lease accounting model: ASU 2016-02 and IFRS 16 diverge in the lessee's classification of the lease upon initial recognition and, therefore, the lease accounting model applied. Under ASU 2016-02, US GAAP continues to distinguish between finance leases and operating leases based on classification criteria that are substantially similar to previous US GAAP. In contrast, the lessee accounting model in IFRS 16 requires all leases to be accounted for consistent with the US GAAP approach for finance leases. Consequently, leases historically classified as operating leases under US GAAP will be accounted for differently under US GAAP than under IFRS and will have a different effect on the income statement under IFRS 16 than under previous IFRS guidance. Note that within US GAAP, the designation of a lease as finance or operating does not affect the reporting of such leases on the balance sheet, as the rights and obligations of all such leases will be reported on the balance sheet.

Leases (continued)

Summary (continued)

Present value measurement: The rights and obligations associated with the lease are recognized and measured on the balance sheet based on the present value of the lease payments. Both US GAAP and IFRS require a lessee to record its lease arrangements by using the interest rate implicit in the lease (i.e. the rate the lessor charges in the lease), if readily determinable, or, alternatively, to use the lessee's incremental borrowing rate. As a result, upon adoption of either ASU 2016-02 or IFRS 16, an investment manager will be required to determine the appropriate discount rate to apply when the lease arrangements are initially recorded on the balance sheet.

ASU 2019-01: An exception has been instated for entities that are not manufacturers or dealers, which generally applies to financial institutions and captive finance companies. For such lessors, the fair value of the underlying asset at lease commencement would be its cost rather than the price that would be received to sell the asset between market participants, unless there is a significant time lapse between the acquisition of the underlying asset and the lease commencement. This exception aligns Topic 842 with the previous US GAAP requirements before ASU 2016-02. Further, for lessors that are depository and lending institutions as defined in Topic 942, all principal payments received under leases are to be included within investing activities in the Statement of Cash Flows rather than operating activities per Topic 842. Under IFRS 16, there are no such exceptions/amendments.

Financial Instruments

Introduction

The IASB and FASB collaborated on a joint project with an intended goal of improving the accounting for financial instruments and moving toward convergence on a single recognition and measurement model. Subsequently, the FASB issued ASU 2016-01, Financial Instruments — Overall (Subtopic 825-10): Recognition and Measurement of Financial Assets and Financial Liabilities and ASU 2016-13, Financial Instruments — Credit Losses (Topic 326): Measurement of Credit Losses on Financial Instruments in 2016 and the IASB issued IFRS 9, Financial Instruments in 2014. Further, in 2019 and 2020, FASB issued ASU 2019-04, ASU 2020-01 and ASU 2020-03 to clarify certain aspects of accounting for credit losses, financial instrument measurement and required disclosures. Although most of the general principles and objectives underlying the amendments to US GAAP and IFRS are the same, there are some existing and evolving instances of divergence that will apply in specific circumstances.

Broadly speaking, there are two general areas where certain reporting entities might have changes. One is the measurement and recording of certain financial instruments. The other is the introduction of a new impairment model for recognition of credit losses.

For investment funds reporting using a fair value model (as is already required under US GAAP and generally under IFRS for investment funds), these amendments are unlikely to have much effect. For investment managers and investors in investment funds, these amendments might have some effect.

Financial Instruments (continued)

Status—US GAAP

ASU 2016-01 was effective for public business entities with fiscal years beginning after December 15, 2017 and all other entities with fiscal years beginning after December 15, 2018. The amendments in ASU 2019-04 and ASU 2020-03 relating to ASU 2016-01 are effective for fiscal years beginning after December 31, 2019. Early adoption was permitted if entities have adopted ASU 2016-01. The amendments in ASU 2020-01 are effective, for public business entities, for fiscal years beginning after December 15, 2020 and for all other entities, for fiscal years beginning after December 15, 2021.

ASU 2016-13 is effective for public business entities with fiscal years beginning after December 15, 2019 and all other entities with fiscal years beginning after December 15, 2020. For entities that have adopted ASU 2016-13, the amendments in ASU 2019-04 relating to ASU 2016-13 are effective for fiscal years beginning after December 31, 2019. Whereas, for entities that have not adopted ASU 2016-13, the amendments are effective on the same dates as this ASU. Early adoption is permitted only once ASU 2016-13 has been adopted.

Status—IFRS

The amendments under IFRS 9 were mandatorily effective for periods beginning on or after January 1, 2018 and there have been no further changes since that time. As such, we have not included a summary of the amendments for IFRS herein. Please refer to the 2018 or 2019 editions of Deloitte's Tech Briefs.

Summary—US GAAP

Classification and Measurement: ASU 2016-01 will not have an effect on investment funds that report under Topic 946, Financial Services—Investment Companies, due to a specific scope exception. Investment managers, however, might be affected to a certain extent depending on the nature of any financial instruments they hold. While this ASU retains many existing requirements, it changes the measurement and classification of investments in equity securities and the presentation of certain fair value changes of financial liabilities measured at fair value.

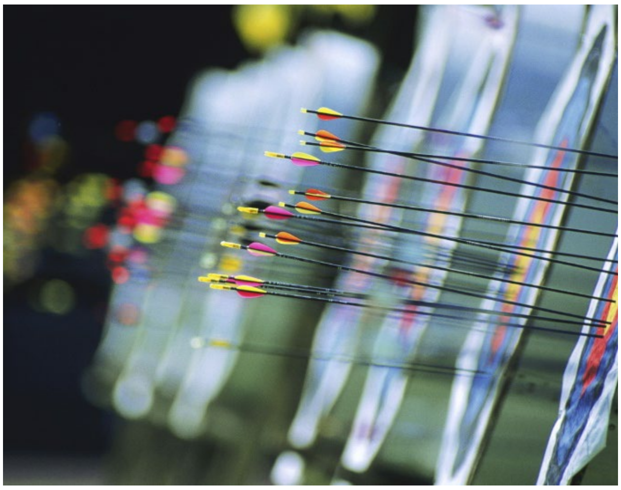
With respect to equity securities, entities will now be required to record all investments in equity securities at fair value with changes in fair value through net income, except for those without a readily determinable fair value that do not qualify for the practical expedient. In such cases, ASU 2019-04 indicates that an entity must re-measure equity securities at fair value when an orderly transaction is identified for an identical or similar asset. Further, ASU 2020-01 clarifies that an entity must consider observable transactions that require it to either apply or discontinue the equity method. This consideration must be done immediately before or upon discontinuing the equity method. For financial liabilities for which the fair value option has been elected, the amendments require a reporting entity to separately recognize in other comprehensive income that portion of the change in fair value associated with instrument-specific credit risk. ASU 2020-01, along with ASU 2019-04, amends certain disclosure requirements. For example, other than for public entities, the fair value disclosure requirements are no longer required for all financial instruments measured at amortized cost. ASU 2020-03 clarifies that these disclosures are required for financial instruments on which the fair value option has been elected.

Impairment: ASU 2016-13 introduces a new impairment model based on expected credit losses rather than incurred losses. This model is intended to better represent the recognition of conditions, economic or otherwise, giving rise to an eventual credit loss throughout the life of the instrument rather than all at the time an incurred loss occurs. This ASU will likely not have an effect on investment funds as its amendments will not affect entities holding financial assets accounted for at fair value through net income (as expected credit losses are already embedded in the fair value). Investment managers that hold instruments carried at amortized cost, including loans receivable, will be affected. This ASU removes the thresholds to measure and recognize credit losses for financial instruments at amortized cost. Instead, these will be measured as the difference between amortized cost and the entity's estimate of credit losses (i.e. amount expected to be collected over the life of the financial instrument). ASU 2019-04 provides certain clarifications on the calculation of credit losses. For example, recoveries on financial assets should be included in the calculation of the estimate of credit losses, which was not specifically indicated within ASU 2016-13.

US GAAP Update

Receivables—Nonrefundable Fees and Other Costs (Subtopic 310-20): Premium Amortization on Purchased Callable Debt Securities (ASU 2017-08)

Introduction



ASU 2017-08, Premium Amortization on Purchased Callable Debt Securities, shortens the amortization period of certain callable debt securities purchased at a premium to the earliest call date. In 2020, FASB issued ASU 2020-08 that specifies that the amortization period is shortened to the next call date, rather than the earliest call date as previously stipulated by ASU 2017-08. The amendments affect all entities that hold individual investments in callable debt securities for which the amortized cost is greater than the amount repayable by the issuer at the relevant call date (i.e. issued at a premium) and for which the call dates and prices are known in advance. As such, this ASU could potentially impact investment funds that invest in such securities. The amendments do not apply in situations where an entity holds a large number of similar debt securities for which prepayments are probable and the dates and amounts of such prepayments can be reasonably estimated per Subtopic 310-20-35-26.

Status

ASU 2017-08 was effective for public business entities with interim periods and fiscal years beginning after December 15, 2018. For other entities, the amendments are effective for interim periods and fiscal years beginning after December 15, 2019. Earlier adoption was permitted. A reporting entity should apply the amendments retrospectively with a cumulative effect adjustment made to retained earnings as of the beginning of the first reporting period in which this ASU is adopted.

ASU 2020-08 is effective for public business entities with interim period and fiscal years beginning after December 15, 2020. For other entities, this is effect for fiscal years beginning after December 15, 2021. Early application is not permitted until after December 15, 2020. The amendments are to be applied prospectively.

Summary

Currently, under US GAAP, entities amortize the premium on purchased callable debt securities over the contractual life of the security, generally as a reduction to interest income, even when it is certain that the issuer will exercise the call option at an earlier date. As a result, a loss is recorded relating to the unamortized premium when the call option is exercised before the maturity of the security. Under the new guidance, this loss would not be needed as entities are required to amortize the premium to the earliest call date. If the call option is not exercised after the earliest call date, the entity should reset the effective yield with the payment terms.

Note that this ASU does not modify the accounting for securities held at a discount. The discount continues to be amortized until maturity.

The New AICPA Auditor's Report

The American Institute of Certified Public Accountants' ("AICPA") Auditing Standards Board has issued several Statements on Auditing Standards (SASs) that impact the auditor's report: SAS 134, Auditor Reporting and Amendments, Including Amendments Addressing Disclosures in the Audit of Financial Statements, and SAS 137, The Auditor's Responsibilities Relating to Other Information Included in Annual Reports. These SASs are effective for audits of financial statements for periods ending on or after December 15, 2021.

The following key changes in the form and content of the auditor's report were introduced:

- Opinion section required to be presented first, followed by the Basis for Opinion section.
- New Basis for Opinion section that includes a statement that the auditor is required to be independent of the entity and to meet the auditor's other ethical responsibilities.
- Expanded description of the auditor's responsibilities, including the auditor's responsibilities relating to professional judgment and professional skepticism, and the auditor's communications with those charged with governance.
- Enhanced auditor reporting relating to going concern, including a description of the respective responsibilities of management and the auditor for going concern. For situations in which substantial doubt exists about an entity's ability to continue as a going concern — a separate section in the auditor's report is now required that includes the heading "Substantial Doubt About the Entity's Ability to Continue as a Going Concern" when substantial doubt exists.
- Allowing, but not requiring (for non-issuer entities), communication of key audit matters in the auditor's report.
- Requires the auditor to include a separate section in the auditor's report with an appropriate heading as it relates to the auditor's responsibilities with respect to the other information.

Regulatory and Legal Update

Economic Substance Law

The International Tax Co-Operation (Economic Substance) Law, 2018 (as amended) (the "ES Law") became effective in the Cayman Islands on January 1, 2019, which introduced increased economic substance requirements in the Cayman Islands for affected entities (i.e. "Relevant Entities" that conduct "Relevant Activities").

A Relevant Entity according to the ES Law includes the following types of entities, unless an entity is an investment fund or is tax resident outside of the Cayman Islands:

- A company, other than a domestic company, that is (i) incorporated under the Companies Law or (ii) a limited liability company registered under the Limited Liability Companies Law.
- A limited liability partnership that is registered in accordance with the Limited Liability Partnership Law.
- A company that is incorporated outside of the Cayman Islands and registered under the Companies Law

Investment funds are not Relevant Entities and are excluded from the requirements of the ES Law. The investment fund exclusion includes any entity whose principal business is the issuing of investment interests to raise funds or pool investor funds with the aim of enabling a holder of such an investment interest to benefit from the profits or gains from the entity's acquisition, holding, management or disposal of investments, as well as any entity through which an investment fund directly or indirectly invests or operates (but not an entity that is itself the ultimate investment held). As such, for investment funds, this law is unlikely to have much effect.

The most common categories of Relevant Activities in the funds' world are fund management and holding company businesses. Entities carrying on these activities must satisfy the Economic Substance Test (unless they are tax resident outside of Cayman), which differs depending on the relevant activity being undertaken. Relevant Entities carrying on a Relevant Activity other than holding company business (including fund management business) must conduct specific core-income generating activities in the Cayman Islands, be directed and managed in the Cayman Islands, and have adequate operating expenditure, physical presence, and employees in the Cayman Islands. Holding companies are subject to a reduced Economic Substance Test, which is satisfied if the Relevant Entity has complied with all applicable filing requirements under the Companies Law and has adequate human resources and premises in the Cayman Islands for holding and managing equity participations in other entities.

All Cayman entities (including investment funds) must file an Economic Substance Notification with the General Registry as a prerequisite to filing the entity's annual return. The Economic Substance Notification confirms whether an entity is a Relevant Entity and if so, whether it is conducting Relevant Activities, and will be transmitted to the Cayman Islands Tax Information Authority ("TIA"). In addition to this notification, a Relevant Entity that is carrying on a Relevant Activity must prepare and submit an Economic Substance Return for the purpose of the Authority's determination whether the Economic Substance Test has been satisfied in relation to that Relevant Activity. The Economic Substance Return must be submitted no later than twelve months after the last day of the end of each financial year commencing on or after 1 January 2019. An entity that is either not a Relevant Entity or is a Relevant Entity but did not carry on a Relevant Activity during the relevant financial year (as specified within the Economic Substance Notification) is not required to submit an Economic Substance Return.

The TIA has acknowledged that it might currently be more difficult for Relevant Entities to hold board meetings in the Cayman Islands as a result of COVID-19. This could affect the requirement for the entity to be managed and directed in the Cayman Islands. The TIA will consider this when determining whether an entity has passed the Economic Substance Test. That being said, Relevant Entities carrying on Relevant Activities should note that the directed and managed requirement is only one element of the Economic Substance test, as the entity's compliance with the other requirements will also be considered by the TIA.

The Foreign Account Tax Compliance Act ("FATCA") and the Common Reporting Standard ("CRS") Updates

The Cayman Islands Department for International Tax Cooperation ("DITC") advised industry that it will be conducting CRS compliance measures from April 2021. In the interest of promoting a robust CRS and FATCA compliance culture, the DITC recommended that all registered office service providers remind all client entities to carefully double-check that they have been correctly classified for CRS and FATCA purposes and are complying with all applicable obligations. For this purpose, a new CRS Compliance Reporting Form was introduced. DITC will be using the data from this form to assist with identifying entities that they will look to carry out desktop exercises of their compliance programme. This is a new and additional requirement under the CRS with 2021 being the first year in which Cayman Islands reporting financial institutions have been required to file a CRS Compliance Form. Failure to file this form is an offence under Cayman Islands law.

Anti-Money Laundering

Since February 2021, the Cayman Islands has taken steps towards improving its anti-money laundering and combatting the financing of terrorism regime ("AML/CFT"), including by applying sanctions and taking administrative penalties and enforcement actions against obliged entities to ensure that AML/CFT breaches are remediated.

Previously the Cayman Islands Monetary Authority ("CIMA") clarified that for an investment fund to comply with the Anti-Money Laundering Regulations (2020 Revision), a beneficial owner must be identified using a 10% or more threshold of beneficial ownership. This applies even if the service provider performing the check is in a jurisdiction that permits a higher threshold.

Operators of investment funds should remind their service providers of this amendment as well as of potential sanctions for non-compliance with AML/CFT.

Virtual Asset (Service Providers) Law

In May 2020, the Cayman Islands government introduced a framework for regulating virtual assets service providers ("VASPs"), which will be required to register with CIMA and receive permission to issue virtual assets above a certain threshold. One of the goals of the new framework is to provide regulations for VASPs and protect consumers. Entities qualifying as VASPs should have been registered with CIMA by January 31, 2021.

This law defines VASPs as a Cayman entity which provides virtual assets services as a business or within the course of a business in or from the Cayman Islands and is registered with this law. Virtual asset services are defined as the issuance of virtual assets or providing any of the following services: exchange and/or transfer of virtual assets, custody services and participation in financial services related to a virtual asset issuance or sale. Virtual assets are identified as a digital representation of value that can be digitally traded or transferred and used for payment or investment purposes. It does not include fiat currencies.

CIMA recognizes that VASPs evolve at a rapid pace and risks related to anti-money laundering, combatting the financing of terrorism and proliferation financing must be re-assessed on an ongoing basis. VASPs are reminded that pursuant to the Anti-Money Laundering Regulations, they are required to take steps to identify, assess, and understand above mentioned risks.

Digital Identity and the Use of E-KYC

Due to the COVID-19 pandemic CIMA-regulated entities often face difficulty in identifying and verifying customers' identities through face-to-face interactions. As such increased use of e-KYC is observed (i.e. the use of automated systems to verify, validate, and authenticate customer due diligence information).

Any regulated entity seeking to use e-KYC system should reach out to CIMA and discuss such aspects of the proposed system as verification, authentication and retention processes, cyber security, data protection considerations etc.

Fund Liquidations

Wind Down and Liquidation Considerations

Our Financial Advisory team specializes in the winding down of entities with a specific focus on investment funds.

In voluntary wind downs they ensure that the necessary resolutions are properly executed to place the entity into liquidation, that required notifications are made to stakeholders, that applicable CIMA licenses are terminated in accordance with best practices, and they ensure compliance with all statutory requirements under the relevant Cayman Islands' acts, rules, and regulations.

They oversee all aspects of the engagement including providing updates and communication to investors, overseeing realization of any remaining assets, calculating and executing distributions to investors, completing necessary tax compliance and regulatory filings, preparing a final report, and holding a final meeting when all matters are completed.

They have significant experience and add value to clients in respect of residual issues such as illiquid and hard to realize assets. Whether it relates to illiquid investments in fund-of-funds, private debt, private equity, or positions impacted by pending litigation or insolvency proceedings, our financial advisory team focus on identifying relevant issues and executing the best solution in the circumstances to achieve maximum value for stakeholders.

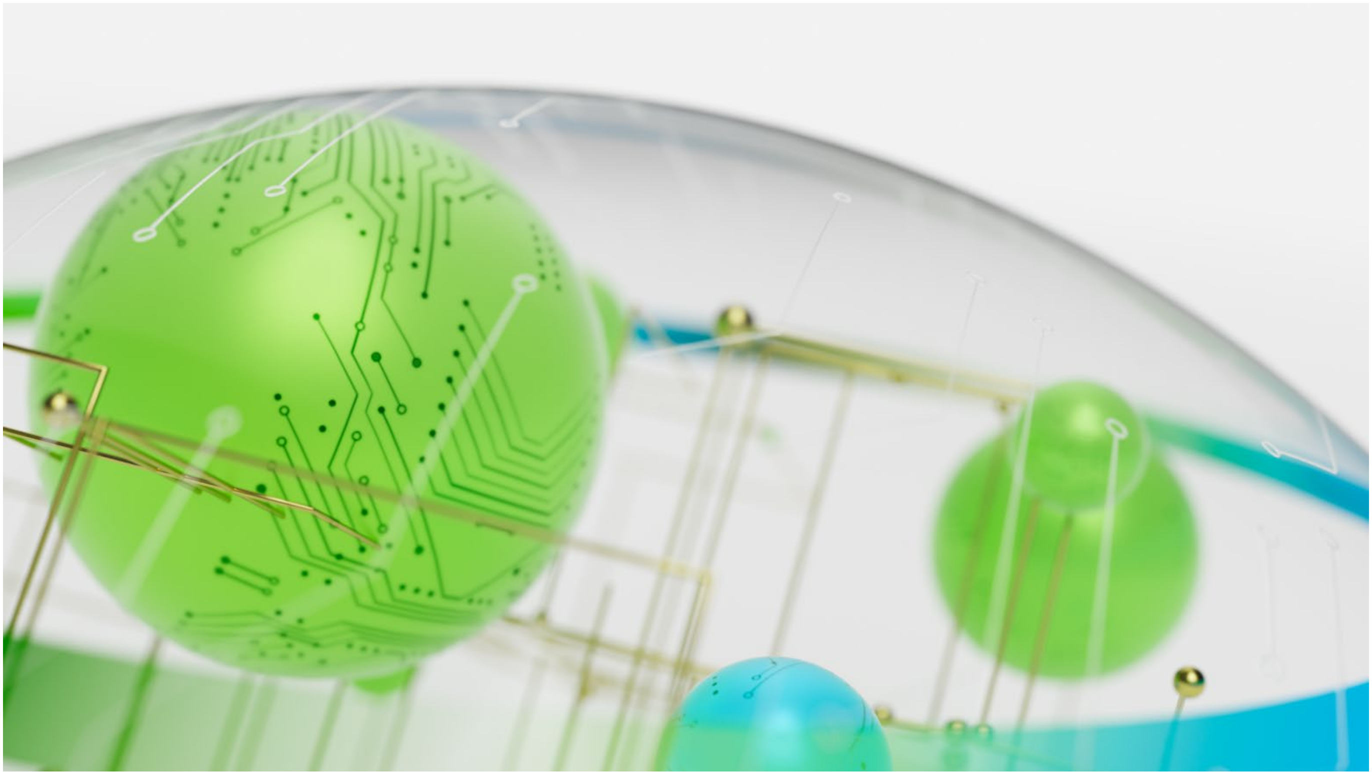
An example: Liquidator added value

Following a series of events that led to a significant and sudden loss in the value of an asset held by a fund; the fund's investors enacted an immediate wind down and liquidation provision in the LPA and its manager passed a resolution to appoint two individuals from Deloitte as Joint Voluntary Liquidators (the "Liquidators").

Immediately prior to the Liquidators' appointment, the fund administrator had resigned due to the complexities surrounding the impaired asset held. Accordingly, the fund's net asset value ("NAV") for the two months preceding the Liquidators' appointment was not finalized. In addition, the fund administrator had commenced the process to pay a $60 million distribution to the investors, which now could not be completed due to its resignation.

Upon their appointment, the Liquidators immediately undertook the following steps to remediate as well as complete the unfinished activities of the fund administrator:

- Collected and reviewed all necessary books and accounting records to understand the fund's operations and financial position.
- Worked with management and reviewed the records obtained to understand the complexities surrounding the impaired asset in order to determine an appropriate and accurate NAV to report to the investors.
- Gave a comprehensive and timely update to the investors on the losses suffered by the fund, the resignation of the fund administrator and the Liquidators' plan for remediation.
- Completed the distribution to the investors. In doing so they calculated an appropriate amount to distribute to the investors taking into account the estimated costs of the liquidation; updated all AML and related KYC procedures on the investors in accordance with Cayman Islands laws and regulations; collected and verified investor wire details; and established an appropriate payment process.
- Completed a second distribution to the investors shortly after the initial distribution payment, comprised of additional asset realization proceeds received.
- Provided quarterly NAV calculations and issued the corresponding statements to the investors throughout the liquidation period.
- Attended to all statutory obligations, including completing the CRS and FATCA reporting to the Cayman Islands Tax Information Authority in advance of the filing deadlines.
- Worked collaboratively with management and carried out investigations to determine the best alternatives available to achieve a recovery on the losses suffered due to the impairment of the asset.



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