

Paul Resnik

**“Being in business
in the new, highly
regulated
Advisory world”**

June, 2011

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www.riskprofiling.com

FinaMetrica

- Psychometric personal financial risk tolerance assessment and application methodologies for individual investors
- Privately owned, Australian business commenced 1998
- Co-founders combined experience 80 years in all parts of service chain
- 3,000 leading edge advisers in 15 countries, directing £20 billion plus
- 75% subscribers are international, translated into 7 languages
- Average subscription duration 5 years plus
- 430,000 profiles completed,
- Up to 12,000 new profiles per month
- ‘Practice Solution’ for small to large advisory groups
- Tailored ‘Enterprise Solution’ for multi-channel businesses

Summary of What We Cover Today

- We have reached the end of 100+ years of ‘Product First’, inefficient and sales oriented ‘advising’.
- From now on regulation will allow little alternative to a ‘Client First’, transparent, efficient and personalised process.
- How to advise effectively, make money, meet regulatory standards and stay in business.

Today’s Agenda

- FinaMetrica’s tool kit.
- Suitability Guidance Paper in context.
- The [mis]management of investment expectations
 - ❖ Deliberately misleading investors [?]
 - ❖ Equity risk premium in seven developed economies
- Building blocks & process to deliver ‘suitable’ advice.
- Six things to protect and grow the advisory business.

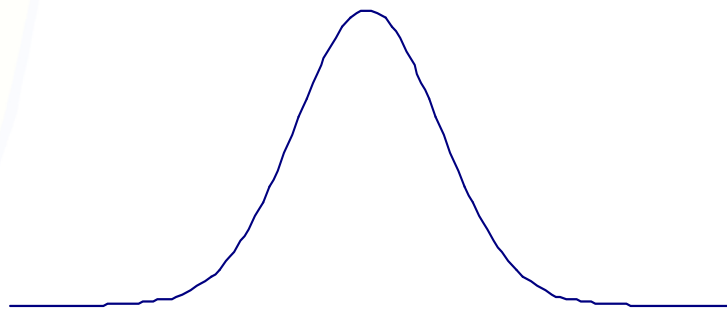
FinaMetrica's Resources

- Quick Start Guide
- Linking Spread Sheet
- Risk and Return Guide
- Monthly commentary
- Research and Practical insights

What We Do

- Accurately & consistently assess risk tolerance
 - ❖ Enable comparison of an individual's risk tolerances between both norms base and partner
 - ❖ Report differences for discussion and acceptance
- Provide a well tested methodology to take risk tolerance into account in the advising process.
- Provide historical 'Risk & Return Guides' to better frame client's investment expectations.

Risk Tolerance: Normal Distribution



Risk Group	1	2	3	4	5	6	7
Score Range	0-24	25-34	35-44	45-54	55-64	65-74	75-100
No. in Group	1%	6%	24%	38%	24%	6%	1%

What We Know about RT

- Risk tolerance scores are normally distributed.
- Majority of individuals [86%] are in the middle 3 groups.
- Women tend to be one risk group less risk tolerant than males.
- Risk tolerance seems to be set by early adulthood.
- Individual's risk tolerance is generally stable but can change.
- Financial services professionals more risk tolerant than clients.

Issues Within the Global Wealth Management Industry

- **investment product failure** in the eyes of the media, governments, regulators and investors
- general **lack of confidence** in integrity of financial advice
- recent **sub-optimal profitability** for advisers, advisory businesses and fund managers in
- **low** level of industry **morale**
- **increasing Know Your Client** responsibilities.

Global Response

- US in bitter Fiduciary debate.
- Australia polarisation, commission bans and 2 year opt-in.
- Germany anxious and lost.
- South Africa following UK.
- India banned commissions with 2 months notice in 2009.
- Hong Kong banning commissions from 2013.
- Singapore test investors.
- NZ July 1 new standards.

Advisory Businesses Put Their Reputation and Corporate Value at Risk Every Day

- Allow their recommended fund managers to **misleadingly explain risk**,
- **Inaccurately and inconsistently assess** investors' **risk tolerance**,
- Do **not have a defensible and rigorous method** for their advisers to arrive at portfolio recommendations.
- Accept their advisers' use of **non-standardised and personal descriptions** of financial risk and volatility with investors,

Fundamental Problem is INCONSISTENT Communication of Risk – No wonder many investors become confused.

The UK Regulator's March 2011 Guidance Paper on Suitability:

- Continues Principles based tradition.
- Buries simplistic portfolio picker asset selection quizzes as jail bait.
- Accepts risk tolerance as a separate measurable input in the planning process
- Critically, asserts that each client's 'Risk Capacity' needs to be fully explored [NEW].
- Provides no meaningful description of how that might be done.
- Will be viewed as the benchmark by Regulators worldwide.

Flaws in Guidance Paper

- Sets a low standard for assessment of risk tolerance.
- Test quality is not psychometric.
- Unfortunately seems to encourage pre test 'coaching'.
- Does not deal adequately with clients capacity for loss.
- Does not deal at all with problems in relation to explanation of investment risk.

Imagine medicine without a standardised method of assessing blood pressure?

- How effectively would doctors communicate with each other, other professionals and patients?
- How would drug companies identify patients at risk in their communications?
- Would patients be confused?

Regularly Confused Terms

- ❖ **Risk Profile**-used to describe a portfolio
- ❖ **Risk Profile**-a description of an individual consisting of
 - Risk Tolerance/Appetite/Attitude-a psychological attribute
 - Risk Perception-a psychological attribute
 - Risk Required-a financial construct
 - Risk Capacity-a financial construct
 - Investment knowledge and experience-a reality

Discussion with the FSA

- Particularly interested in the depth and quality of the adviser's recorded discussion with investor[s] based on the resolution of differences in both the test and risk capacity.
- Adviser is expected to show equal depth of analysis whether short or long form test such as FM used.
- If short form test used then detail of reconciliation will still have to be made later in the process.

Tipping Point to New Order

Product First

- 'Super' profits-allows inefficiency
- Investment orientation
- 'Investment of the month'
- Investment differentiated
- Idiosyncratic portfolios
- Investment advising
- Product remuneration
- Customer's Caveat Emptor
- Adviser 's personal advice
- Paternalistic advice
- 'I know this fund is right for you'

Client First

- Reasonable profits-demands scalability
- Client centric
- Investments to meet needs-last option
- Investments commoditised
- Model portfolios
- Client advising
- Service remuneration
- Adviser's Fiduciary obligations
- Process driven advice
- Collective decision making in the plan
- Client's informed consent

Benefits of Consistency

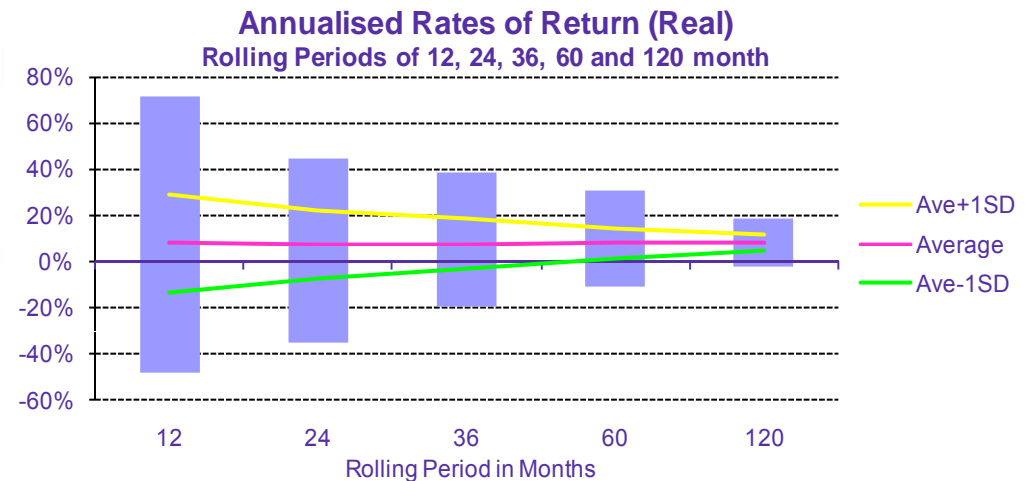
- Shows respect for the individuality of investors
- Enhances investor satisfaction
- Establishes realistic investment expectations
- Boosts adviser productivity
- Improves regulatory compliance
- Increases investment persistency
- Promotes business moral
- Reduces reputation and business risk
- Protects and grows enterprise value.

Value Clients

What is the value/present value of a 45 year old client with a £500,000 portfolio paying you 1% pa

- a. £5,000
- b. £15,000
- c. £250,00
- d. £500,000?

Typical Investment Manager's Explanation of Volatility

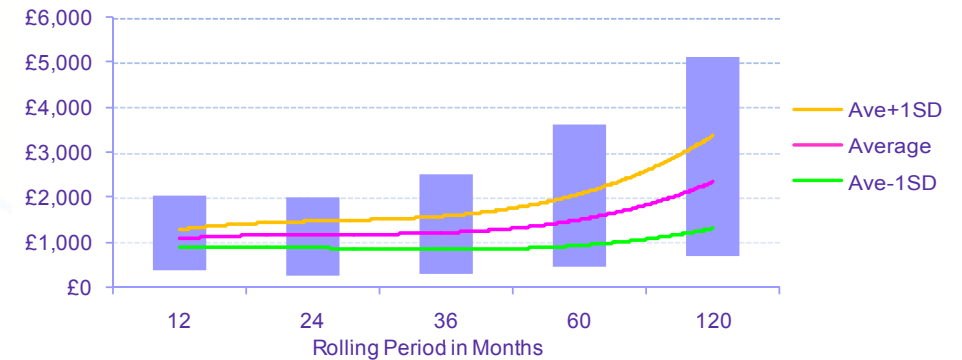


Deliberately Misleading?

- Statistically correct but financially flawed
- Graphics suggest that volatility of investment outcomes reduces over time which is simply untrue
- Concentrates on percentage volatility not dollars.
- Ignores consequences of inflation
- Usually focused on one or sometimes two standard deviation of volatilities which ignore outlier events.
- No help preparing clients for
 - ❖ the excess optimism that occurs when markets are rising beyond normal
 - ❖ the excess pessimism that occurs when markets are in declines beyond normal.

Investor's Experience of Volatility

End-Values of £1000 Invested, FT- Actuaries All-Share (Real)



Real Returns from an Investor's Perspective

Even over 10 years an investor may lose purchasing power.

Most likely return is doubling of purchasing power over 8 to 10 years.

Few investors would have experienced 3 to 5 times increase in purchasing power.

FM's UK Portfolio Splits

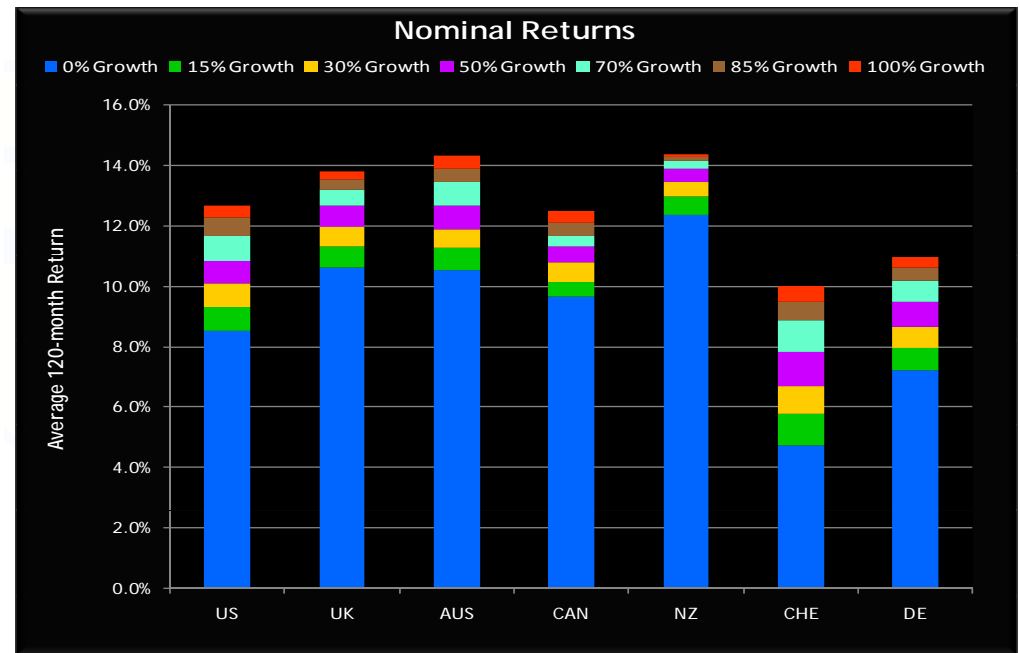
Portfolio	Defensive/Growth		Asset Allocations				
	Defensive	Growth	Cash	Fixed Int.	Int. FI	Shares	Int. Shares
1	100%	0%	10%	60%	30%	0%	0%
2	85%	15%	5%	50%	30%	10%	5%
3	70%	30%	0%	40%	30%	20%	10%
4	50%	50%	0%	30%	20%	30%	20%
5	30%	70%	0%	10%	20%	40%	30%
6	15%	85%	0%	5%	10%	45%	40%
7	0%	100%	0%	0%	0%	50%	50%

Cash: United Kingdom Total Return Bills Index (Source: Global Financial Data, Inc.).
 Fixed Interest: United Kingdom 10 Years Government Bond Total Return Index (Source: Global Financial Data, Inc.).
 International Fixed Interest: JP Morgan Global Government Bond Index. For the period prior to the commencement of this index in 1986, a proxy based on 10 year US Government Bonds was used.
 Shares: United Kingdom FT- Actuaries All-Share Total Return Index (Source: Global Financial Data, Inc.).
 International Shares: MSCI World ex UK Gross Index.
 Bank Deposits: Bank of England, Sterling Certificate of Deposit rates (3 months) end month. For the period prior to the commencement of this index in 1975, Global Financial Data's 3-month Time Deposit Rate was used.
 Inflation: Retail Prices Index – All Items (Source: National Statistics.) For the period prior to the commencement of this index in 1987, the Global Financial Data, Inc. equivalent was used.

NOT Optimised Portfolios: For Illustration Purposes Only

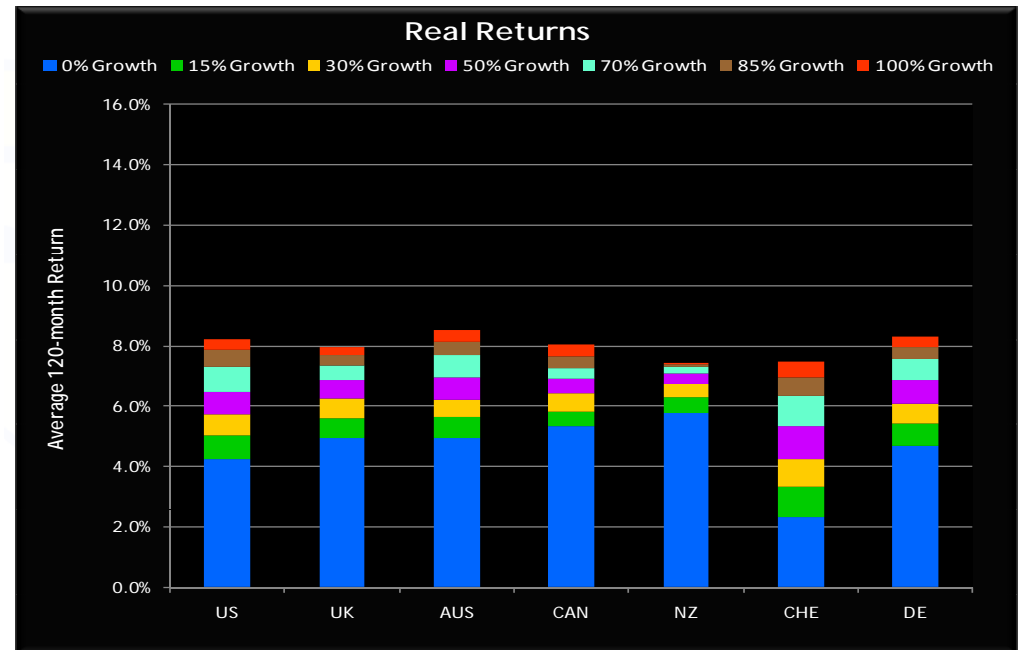
Review of Equity Risk Premium

- From an investor's perspective
- Similarity of returns in seven countries
- Before costs, taxes and any portfolio implementation leakage.



Nominal Returns from an Investor's Perspective

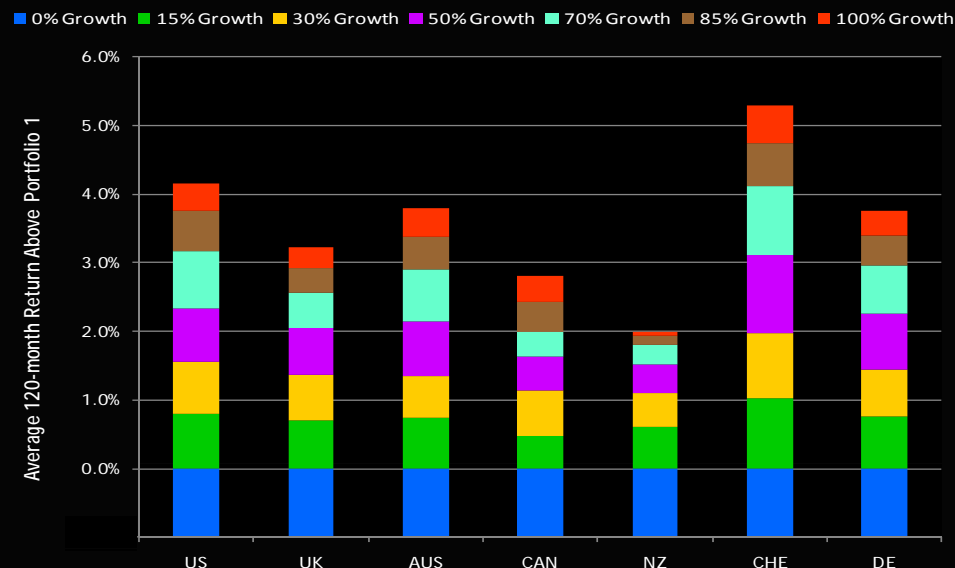
- Representing 7 portfolios with from 0 to 100% growth assets
- Average of rolling 10 year returns, accumulation indexes, monthly stops, rebalancing annually, 1970 to current
- 7 countries: US, UK, Australia, Canada, NZ, Switzerland and Germany
- Discloses broad range 10 -14% pa return



Adjusted Returns after Inflation

- Returns more consistent across countries
- Returns within 7 to 8% pa for growth assets
- Bond and cash returns show wide variation

Equity Risk Premium Above 0% Growth



Equity Risk Premium Normalised from an Investor's Perspective

- Base return, zero, is 0% Growth
- Cash and conservative bond funds
- 50% growth assets, typically delivers just over 2% additional return
- 50% growth assets is consistent with average risk tolerance of advisers' clients

Average 120 Months Returns 1970 to Present

GROWTH	US	UK	AUS	CAN	NZ	SWTZ	GER
0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
15%	0.8%	0.7%	0.7%	0.5%	0.6%	1.0%	0.8%
30%	1.6%	1.4%	1.3%	1.1%	1.1%	2.0%	1.5%
50%	2.3%	2.1%	2.1%	1.6%	1.5%	3.1%	2.3%
70%	3.2%	2.6%	2.9%	2.0%	1.8%	4.1%	3.0%
85%	3.8%	2.9%	3.4%	2.4%	1.9%	4.7%	3.5%
100%	4.2%	3.2%	3.8%	2.8%	2.0%	5.3%	3.8%

UK: Largest Three Falls

Growth Assets	Incremental Return	Accumulated Return	Depth of Fall	Started Falling	Depth of Fall	Started Falling	Depth of Fall	Started Falling
0%	0.0%	0.0%	-6.5%	Jan-09	-5.1%	Feb-94	-4.5%	Jun-79
15%	0.7%	0.7%	-7.1%	Jan-73	-6.5%	Jan-09	-6.3%	Feb-94
30%	0.7%	1.4%	-16.8%	Jan-73	-11.6%	Aug-87	-9.0%	Jan-90
50%	0.7%	2.1%	-27.6%	Jan-73	-18.1%	Sep-00	-17.4%	Aug-87
70%	0.5%	2.6%	-36.8%	Jan-73	-31.1%	Sep-00	-24.2%	Oct-87
85%	0.4%	2.9%	-43.5%	Jan-73	-39.1%	Sep-00	-27.7%	Oct-87
100%	0.3%	3.2%	-49.9%	Jan-73	-46.3%	Sep-00	-36.3%	Nov-07

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Equity Risk Premium Lessons

- 2008 was not necessarily the worst portfolio period in recent history, even if it was the worst in recent memory
- Return has not consistently increased with risk
- Incremental return is valuable to those with lengthy investment horizons but has lesser consequences for those with shorter time spans
- Need to emphasise non-investment related benefits of financial advice in proposition to clients.

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Who Decides if the Equity Risk Premium is Worth the Risk?

- Risk and return, in terms of the three worst drops in the last 40 years, is shown for each of the seven portfolios.
- How might the investor respond if similar drops occurred in the future?
- Should we be discussing such a scenario regularly with the investor?

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A Simple Self Administered Suitability Test – Five Proofs

- Prove you know your client-their circumstances, needs and aspirations [particularly their risk capacity].
- Prove you looked at the alternative strategies available to them- change goals, work longer.
- Prove you know the product/s recommended.
- Prove you explained the risks in the product/s recommended & the proposed plan to the client.
- Prove you received your clients consent to the risk in the plan and the product.

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Fundamental Building Blocks for Good Advice and to Meet Suitability Guidelines

- Test to accurately and consistently assess financial risk tolerance
- Proven resource to realistically explain risk and return
- Cash flow modelling tool
- Reliable source of future capital market performance assumptions
- Provable portfolio implementation capability

Putting the Building Blocks Together

1. Psychometric [accurate] assessment of investors' risk tolerance.
2. Proven methodology to engage investors in their plan.
3. Simple process to test appropriateness of investment advice.
4. Proven method for setting investors' expectations.

This illustration highlights the variable sections in the FinaMetrica Risk Tolerance report

Personal Financial Risk Profile
Prepared for **Jean Sample**
from the questionnaire completed on **07 September 2010**

Your Risk Tolerance Score
Your Risk Tolerance Score enables you to compare yourself to a representative sample of the adult population. Your score is 58. This is a higher-than-average score, higher than 77% of all scores.

When scores are graphed they form a bell-curve as shown below. To make the scores more meaningful, the 0 to 100 scale has been divided into seven Risk Groups. Your score places you in Risk Group 5.

Risk Group	1	2	3	4	5	6	7
Score Range	Less than 25	25-34	35-44	45-54	55-64	65-74	75 or more
No. in Group	1%	6%	24%	35%	24%	6%	1%

In answer to the last question, you estimated your score would be 50. Congratulations! You were close. Most people under-estimate their score by a few points.

Your Risk Group
The description of Risk Group 5 which follows provides a summary of the typical attitudes, values, preferences and experiences of those in your group. Three of your answers differed from this description. They are shown in italics below the relevant sections. These differences feature the description to you personally.

Self-imperson Rating
No. of Differences

Making Financial Decisions
Most think of "risk" as "opportunity" and have a reasonable amount, if not a great deal, of confidence in their ability to make good financial decisions. They usually feel at least somewhat optimistic about their major financial decisions after they make them. They are prepared to take a medium degree of risk with their financial decisions and are usually, if not always, more concerned about the possible gains than the possible losses. You think of "risk" as "uncertainty".

Financial Disappointments
Typically, when things go wrong financially they adapt at least somewhat easily. When things go wrong financially you usually adapt somewhat uneasily.

Financial Past
They have taken a medium degree of risk with their past financial decisions. About half have borrowed money to make an investment. Most have never invested a large sum in a risky investment mainly for the "thrill" of seeing whether it went up or down in value. You have never borrowed money to make an investment.

Investment
Most feel that it is at least somewhat more important that the money value of their investments retains its purchasing power than that it does not fall. Over ten years, most expect an investment portfolio to earn, on average, from two to two and a half times the rate from term deposits. Typically, they would begin to feel uncomfortable if the total value of their investments went down by 20%. Given these portfolio choices,

	Expected Return and Risk		
	High	Medium	Low
Portfolio 1	0%	0%	100%
Portfolio 2	0%	30%	70%
Portfolio 3	10%	40%	50%
Portfolio 4	30%	40%	30%
Portfolio 5	50%	40%	10%
Portfolio 6	70%	30%	0%
Portfolio 7	100%	0%	0%

where shares and property are high return/high risk and cash and term deposits are low return/low risk, their most common choice is Portfolio 5.

Borrowing
If they were borrowing a large sum of money at a time when it was not clear which way interest rates were going to move and when the fixed interest rate was 1% more than the then variable rate, they would choose to have at least 50% of the loan at variable interest.

Government Benefits and Tax Advantages
So long as there was only a small chance they could finish up worse off than if they'd done nothing, they would take a risk in arranging their affairs to qualify for a government benefit or obtain a tax advantage.



Always Review the FM Report and Discuss Differences with the Client

“Amend the score if necessary and always take client’s sign off.”

FinaMetrica Practice Points

- All questions contribute to the scoring.
- Do not coach particular answers. If you are concerned, just cover in review of differences.
- Some differences are more important to discuss with client[s] than others i.e. loss concern.
- With couples there is no definitive method of resolving dominant RT.
- Redo test at least every two years or after trauma.

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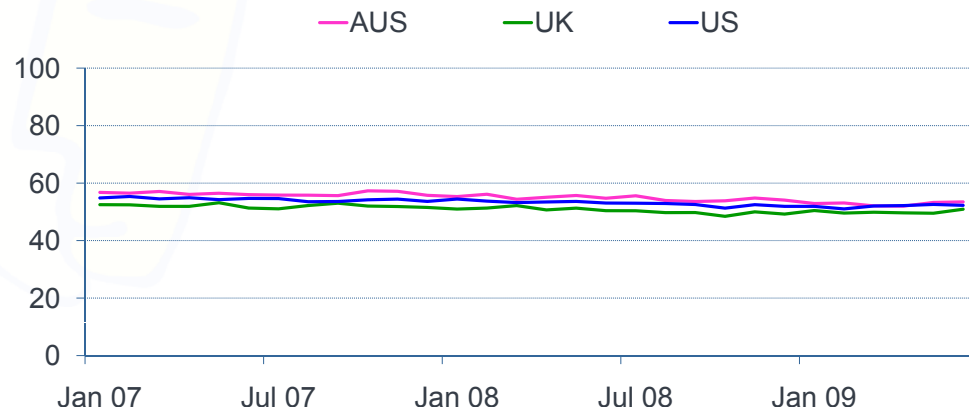
Risk Tolerance - an Enduring Personal Trait

- Tool is psychometric. Tests what it purports to test.
- Average monthly score +/- 52 since 1998, 3 countries.
- University study, no change caused by sentiment or stock market volatility pre 2008.
- Test/retest before and after 2008 crisis.
- High end IFA subscribers confirm consistency.
- High level of subscriber satisfaction, testimonials, referrals and renewals.

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Proof that Risk Tolerance is Stable- Monthly Average Risk Tolerance Scores January 2007 to June 2009



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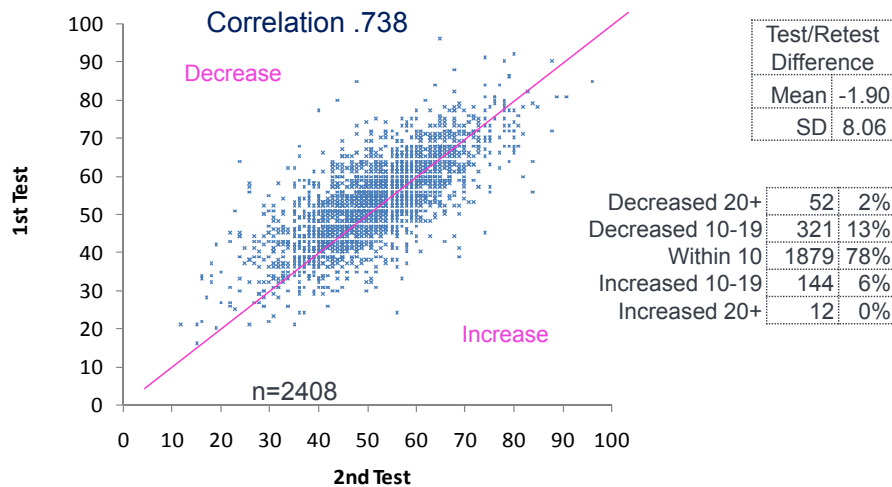
Results of GFC Test / Retest

- Original Test: July 2003 to Dec. 2007
- Retest: August 2008 to July 2009
- n = 2,408 investors

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Test / Retest



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Risk tolerance did not change. What changed was investor's perception of risk.

- Before the market corrected investor's believed there was little risk of losing money
- After the market corrected investor's believed there was a higher risk of losing money.

Investors are generally poorly informed about the riskiness of their investment portfolio.

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Risk Tolerance is Stable

- One of the few parts of an investor's life that does not alter year on year.
- Assets, liabilities, income, expenses, expectations and preferences, for instance, all change.
- Basis for regular discussion between adviser and investor to establish the investor's expectation of risk in their portfolio.

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2. Knowing the Investor's Financial Risk Tolerance Enables the Adviser Test the Appropriateness of Portfolios to Meet the Investor's Needs.

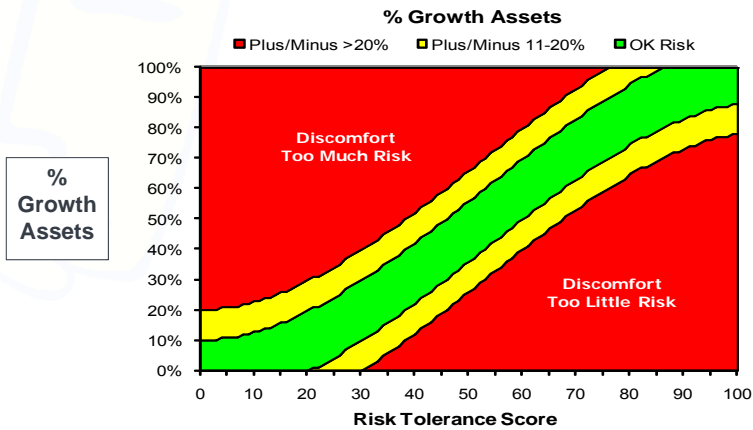
The adviser must link clients risk score to a broad asset allocation.

The next step is to decide if that broad asset allocation meets the financial needs of the client in terms of both cash flow to meet expenses and capacity to cope with loss.

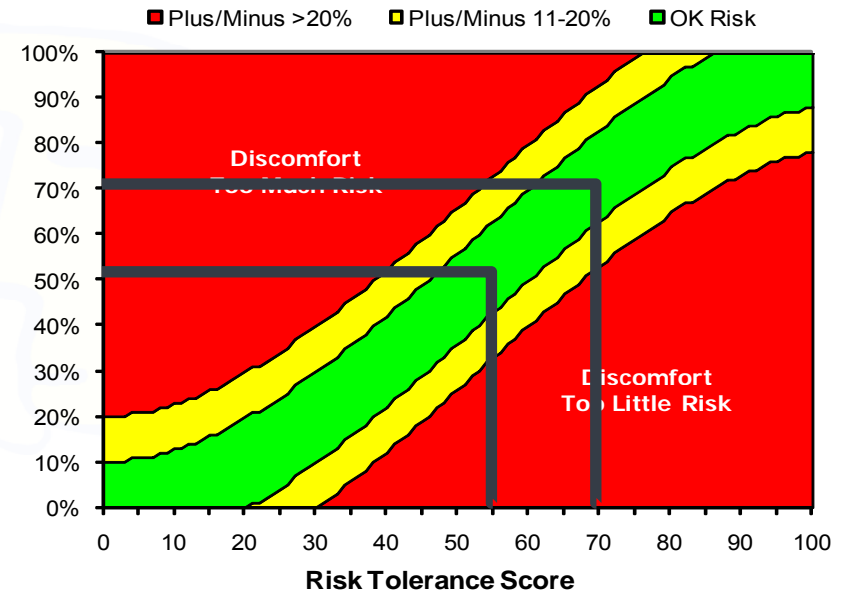
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Converting Risk Scores to Growth Asset Exposure



% Growth Assets



INDICATIVE MORNINGSTAR PORTFOLIOS

	Asset Allocation	Growth Assets	Risk Tolerance Score Ranges					
			Best Fit	Too Much Risk	Marginal	OK Risk	Marginal	Too Little Risk
1	Conservative	30%	19 - 45	< 19	19 - 29	30 - 45	46 - 52	> 52
2	Mod. Conservative	49%	46 - 57	< 37	37 - 44	45 - 58	59 - 66	> 66
3	Moderate	64%	58 - 69	< 48	48 - 55	56 - 70	71 - 78	> 78
4	Mod. Aggressive	79%	70 - 82	< 59	59 - 66	67 - 84	85 - 100	> 99
5	Aggressive	94%	83 - 100	< 71	71 - 78	79 - 100	n.a.	n.a.

3. A Financial Plan Needs:

- Clients' existing assets and liabilities
- Prospective cash flows based on goals and aspirations
- View of future capital market returns

Morningstar: Ibbotson Asset Allocation Methodology

Develop asset class inputs:

Ibbotson begins by analysing broad asset classes and constructs long-term expected returns, standard deviations, and correlation coefficients

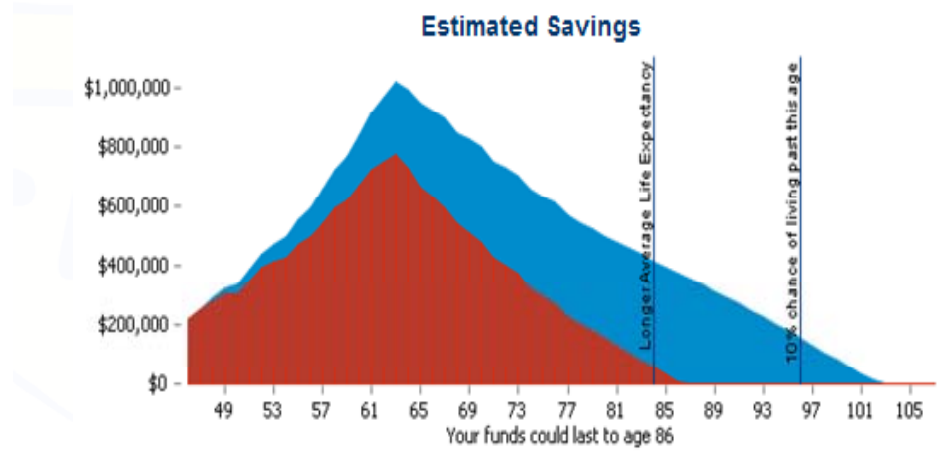
These form the inputs for the mean-variance optimization [a statistical technique]

Because forecasting is a critical and pivotal step in the asset allocation process, Ibbotson develops proprietary capital market forecasts for each asset class using a combination of historical data, current market information, and additional analysis.

Each forecast becomes an input in portfolio creation.

FAQs Relating to Capital Market Assumptions and Asset Models Available via Morningstar Adviser Workstation (AWS)

- 1) How is the Asset Mix Selected?
 - Asset classes are used in a mean variance optimization process and selected based on their correlation with other asset classes.
 - (diversification benefits), market representations (larger opportunity set = accessibility and liquidity) and investor preference/constraints.
- 2) What is the standard UK breakdown and the expected returns/standard deviations?
 - These can be found within AWS in the Market Assumptions sections.
- 3) Are the expected returns and standard deviations assigned to each asset class annually?
 - Ibbotson updates expected returns, standard deviations, and correlations on an annual basis.
- 4) Are the expected returns pure investment return or do they assume dealing/transactional costs?
 - Dealing and transaction costs are not assumed in the return estimates.



Base graph on my... return target compare to my... risk tolerance

Client Risk Trade Off

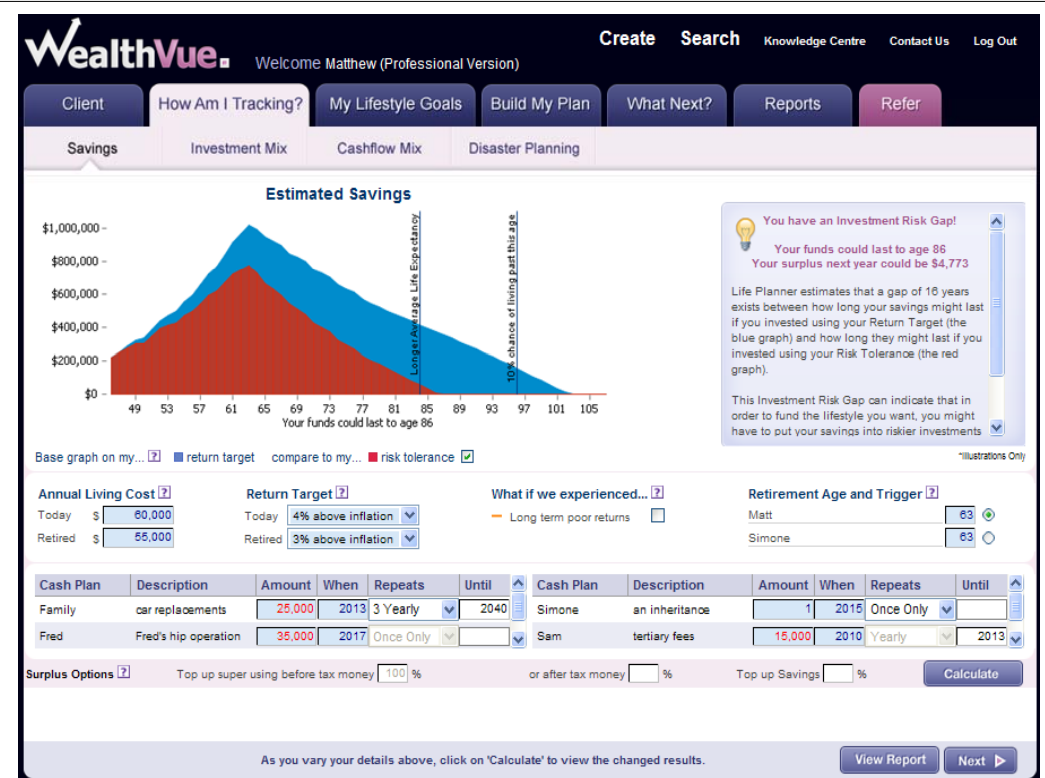
RED: projected net assets based on asset allocation consistent with investors' risk tolerance, goals and aspirations.

BLUE: projected net assets based on asset allocation that meets investors' goals and aspirations.

Clients' Options

- Spend less/save more
- Work more effectively/ for longer
- Access other assets i.e. downsize home
- Change goals
- Reduce investment costs and taxes
- Diminish, investment implementation leakage
- Last issue is to decide on the investment risk

The interplay between the options is the basis for the adviser's ongoing relationship with the client.



Test Risk Capacity

- Look at possibilities of portfolio volatility such as Monte Carlo modelling of investment expectations.
- Review with client preferred and minimum living standards.

4. Personalise Investment Manager's and Adviser's Explanation of Risk

- Engage investor [and partner] through link to their risk scores
- Project forward to show consequences on investors' future plans
- Enables investors' informed consent to the risk in their financial plan

Risk Group 4 (45 to 54)

Members of Risk Group 4 typically make the following choices,

Preferred Portfolio? (50% equities)

(Q16):

10 yr Return Ten year return of 1.5 to

Expectations? (Q21): 2 times Bank

Deposit/CDs/Term

Deposit rate.

Sensitivity to Volatility? Total value of

(Q14): investments could fall by 20% before the investor would begin to feel uncomfortable.

Risk Group 6 (65 to 74)

Members of Risk Group 6 typically make the following choices,

Preferred Portfolio? (Q16): (85% equities)

10 yr Return Ten year return of at

Expectations? (Q21): least 3 times Bank

Deposit/CDs/Term

Deposit rate.

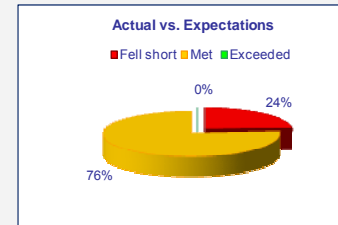
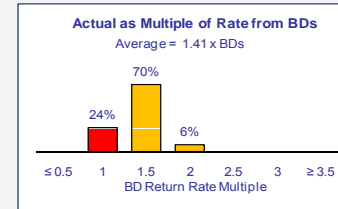
Sensitivity to Volatility? Total value of

(Q14): investments could fall by 33% before the investor would begin to feel uncomfortable.

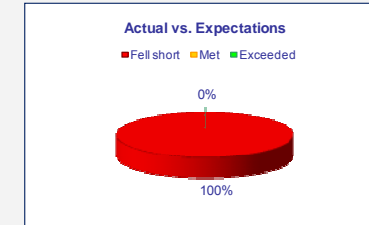
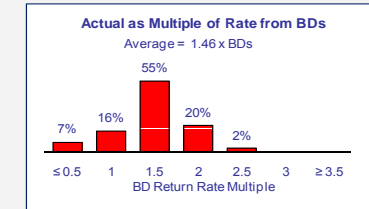
UK Historical 10-year Returns

The actual annualised return from Portfolio 4 and 6 is expressed as a multiple of the return from 3 months Bank Deposits for each 120-month rolling period. The bar charts shows the frequency of actual returns expressed as a multiple of the rate of return from Bank Deposits.

Risk Group 4



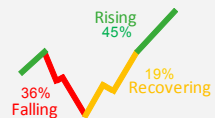
Risk Group 6



UK Historical Volatility – Top Ten Falls

The value of the portfolio was tracked month-by-month, with each month being categorized as Falling, Recovering or Rising, with the frequency of each being as follows.

Risk Group 4



Depth of Fall	Started Falling	Months in Fall	Months to Recover	Completed Recovery
-27.5%	Jan-73	24	3	Mar-75
-18.1%	Sep-00	29	22	Nov-04
-17.4%	Aug-87	4	13	Dec-88
-13.5%	Jan-90	9	4	Jan-91
-9.5%	Jan-09	2	5	Jul-09
-8.3%	Feb-94	5	9	Mar-95
-7.8%	Jan-08	10	1	Nov-08
-7.6%	May-79	7	6	May-80
-7.3%	Apr-70	2	3	Aug-70
-7.0%	Oct-77	5	2	Apr-78

Risk Group 6



Depth of Fall	Started Falling	Months in Fall	Months to Recover	Completed Recovery
-43.4%	Jan-73	21	12	Sep-75
-39.1%	Sep-00	29	35	Dec-05
-27.7%	Oct-87	2	15	Feb-89
-26.5%	Nov-07	16	11	Jan-10
-22.7%	Jan-90	9	7	Apr-91
-14.2%	Jan-70	5	7	Dec-70
-12.1%	Aug-98	2	1	Oct-98
-10.9%	Oct-77	5	2	Apr-78
-10.1%	Jun-92	3	1	Sep-92
-9.6%	May-79	3	10	May-80



Frame Investor's Expectations

- Relative returns in relation to increasing exposure to growth assets has been mismatched for those with higher than average risk tolerance scores.
- The 40 year history of returns suggests that many are likely to be surprised by how low they have been.
- The outliers in the range of positive and negative returns are likely to be a surprise for many investors because current explanations of risk do not frame expectations appropriately.



A consistent enterprise wide financial planning process shows due respect for the individuality of clients. It also enhances investor satisfaction through the establishment of realistic investment expectations which in turn generates:

- Greater adviser productivity.
- Improved regulatory compliance.
- Increased investment persistency.
- Higher business morale.
- Reduced reputation and business risk.
- Protection and growth of the enterprise's value.

FinaMetrica Partners

- Prestwood
- Plan Plus
- Margetts
- Voyant
- Morningstar
- and others to come

The Way Forward

- Prepare for more regulation, it is inevitable
- Take control of client's investment expectations
- De-emphasise alpha chasing and promote wealth protection
- Standardise portfolios
- Encourage clients to take the investment decisions i.e. move to 'informed consent' model
- Need to emphasise non-investment related benefits of financial advise in proposition to clients