

# **MSCI GLOBAL MARKET ACCESSIBILITY REVIEW**

June 2019

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## 1 Introduction

The MSCI 2019 Global Market Accessibility Review includes updated market accessibility assessments for all markets MSCI covers as well as comparisons to the 2018 review. This permits analysis of the evolution of Developed, Emerging, Frontier and Standalone Markets in terms of market accessibility.

The MSCI Global Market Accessibility Review aims to serve as a tool for international institutional investors to better track the evolution of market accessibility in individual countries as well as for regulators to be informed of the areas perceived as not meeting international standards and for which improvement would be welcomed by international institutional investors.

Consistent with prior years, the MSCI 2019 Global Market Accessibility Review provides a detailed assessment of market accessibility for each country market included in the MSCI Indexes. In particular, it provides an evaluation of the five market accessibility criteria, which are:

- Openness to foreign ownership
- Ease of capital inflows / outflows
- Efficiency of the operational framework
- Availability of investment instruments
- Stability of the institutional framework

These five criteria are reflective of the views of international institutional investors who generally put a strong emphasis on equal treatment of investors, free flow of capital, cost of investment, unrestrictive use of stock market data and country specific risk.

MSCI uses 18 distinct accessibility measures for the assessment of these five criteria. The evaluation of the accessibility measures is mainly based on investor experience. MSCI sought feedback from multiple participants in all markets including active and passive asset managers, asset owners, brokers, custodians, stock exchanges and regulators.

The individual measures are absolute in the sense that the analysis and the assessment were performed in the same way across all countries regardless of their current market classification. The aggregate assessment of where a market stands with respect to the five criteria allows MSCI to determine if a country's market accessibility level meets Developed, Emerging or Frontier Market standards. MSCI welcomes feedback from the investment community to ensure that its market accessibility assessment continues to reflect international institutional investors'

experience of investing in a given market. The MSCI Global Market Accessibility Review is updated annually in June with interim updates released as necessary.

## 2 Assessing Accessibility

This section describes the rationale underlying each of the accessibility criteria and related measures and the principles used in their assessment. In some cases, the existence (or the lack of) certain practices systematically defaults to a negative assessment in the relevant category.

### 2.1 Openness to Foreign Investors

In general, one of the most desirable features that international investors would like to see in a market is that no distinction is made between local and international investors. In order to assess this level of openness the following characteristics need to be analyzed and measured.

#### 2.1.1 Investor Qualification Requirement

The international standard for Developed Markets is the absence of any investor qualification requirement. Near the other end of the spectrum, a qualified foreign institutional investor (QFII) license system is highly problematic as it discriminates not only between domestic and foreign investors, but also among different international investors. The requirement of a QFII license would lead to a low assessment.

#### 2.1.2 Foreign Ownership Limit Level

Ideally, international investors would like to see no difference in the opportunity set available to them and to local investors. Foreign ownership restrictions tend to be placed on specific industries which may result in an important sector bias in the opportunity set for foreign investors. MSCI has also considered the proportion of a market that is restricted to assess the materiality of the restrictions. In its assessment, more than ten percent of a market being closed to foreign investors has resulted in a negative rating, between ten and three percent has been considered as a matter of some concern while less than three percent has been considered as not being a material issue. In general, changes in criteria's rating driven solely by price movement will be reflected if the market consistently breaches the relevant thresholds for 3 consecutive years. These levels were set after analyzing the different market impacts resulting from the foreign ownership limits across all countries.

### 2.1.3 Foreign Room Level

When the foreign ownership limit is reached, investors are faced with a serious problem. In some cases, the most recent buyers may be forced to sell, but more generally the crossing of the limit leads to unfair treatment between existing investors and new investors as managers may not be able to offer the same amount of shares across funds. This can be mitigated by the presence of a foreign board or by the listing of depositary receipts in another market where foreign investors could trade with each other, but these solutions may introduce another layer of problems as transactions tend to take place at a premium over the official listing. To assess the materiality of the problem, MSCI has considered the impact on the respective country Investable Market Index resulting from the exclusion or partial exclusion of securities from such index due to low foreign room. More than one percent impact on the MSCI country IMI Index has resulted in a negative rating, between one and 0.3 percent impact has been considered as a matter of some concern while less than 0.3 percent impact has been considered as not being a material issue. In general, changes in criteria's rating driven solely by price movement will be reflected if the market consistently breaches the relevant thresholds for 3 consecutive years. These levels were set after analyzing the different impacts of low foreign room across all markets.

### 2.1.4 Equal Rights to Foreign Investors

Restrictions on foreign investors can take the form of separate share classes with those with reduced voting rights being the only ones available to foreign investors. International investors seek equal treatment in terms of economic and voting rights. As a practical matter, the exercise of equal economic rights requires, among other things, equal treatment in the case of corporate actions which implies proper access to information in English. Equality of voting rights is impacted not only by voting restrictions specific to foreign investors, but also by other limitations imposed on minority shareholders in general. Low foreign ownership limits, generalized use of share classes with different voting rights to facilitate the control of companies, other forms of discrimination against foreign and minority shareholders, as well as major corporate governance problems, generally would lead to lower ratings in this measure.

## 2.2 Ease of Capital Inflows and Outflows

International investors want to be in a position to move capital in and out of a market without disruption, delay and cost inefficiency. This is measured by the following:

### 2.2.1 Capital Flows Restriction Levels

Countries that currently impose or have a record of recent imposition of capital controls to restrict inflows or outflows of capital into or from their equity markets are rated negatively.

### 2.2.2 Foreign Exchange Market Liberalization Level

In Developed Markets, the standard is the existence of a fully convertible currency, which includes an active offshore deliverable currency market. Developed Markets investors are used to the simultaneous execution of all their FX trades with the counterparty of their choice, based on best execution. The absence of an offshore currency market leads to a negative assessment, as it forces parties to transact onshore at a higher cost, very often through a limited choice of intermediaries, and therefore often not on the basis of best execution. Currency shortages are also problematic.

## 2.3 Efficiency of the Operational Framework

This category reflects the features an international investor views as necessary to ensure that its holdings are well identified and well protected, that operational risks are mitigated as much as possible, and that the various aspects of trading, clearing, settlement and custody work appropriately and on a cost effective basis. In particular, in the context of Developed Markets, the levels of efficiency achieved have made possible the provision of equity funds managed on an extremely cost effective basis, with the natural corollary that preserving this efficiency, rather than diluting it with the addition of less cost effective markets, has become a very strong requirement of an important part of the investment management industry.

### 2.3.1 Investor Registration & Account Set Up

The number and the type of required documents as well as the time to complete the full process are the key considerations for this measure. The time to complete the process includes the preparation of the documents. These requirements can be extremely onerous for asset owners with multiple mandates and for asset managers with multiple funds.

### 2.3.2 Market Regulations

In addition to the level of advancement of the legal and regulatory framework governing the financial market, the stock exchange and the various other entities involved in the financial markets, an important weight is assigned to: ease of access

(including in English), lack of ambiguity in and prompt enforcement of laws and regulations. Lack of consistency and unexpected changes in policy, in particular targeting foreign investors, are rated negatively.

### 2.3.3 Information Flow

Good information flow is a key ingredient in respect of shareholder rights, in sound investment decisions and more generally in overall market efficiency. Quality, timeliness, availability in English and affordability play a role in this assessment. In addition, the quality of local accounting standards, as assessed, for example, by the adoption of International Financial Reporting Standard (IFRS), is also important for international investors.

### 2.3.4 Clearing and Settlement

A well-functioning clearing and settlement system based on the broad framework published by the Bank for International Settlements including Delivery Versus Payment (DVP), the absence of pre-funding requirements/practices, the possibility of using overdrafts and the availability of real omnibus structures are considered in this category.

### 2.3.5 Custody

An important requirement is an efficient mechanism that prevents brokers from having unlimited access to the investor's accounts and that guarantees the safekeeping of the investor's assets. The level of competition among custodian banks within each market is measured by the number of active custodian banks as well as the presence of global custodian banks.

### 2.3.6 Registry / Depository

The existence of a well-functioning central registry or of independent registrars and a central depository are important characteristics. A central depository acting as a central registry is also considered as a standard feature. Registration at the issuer level or instances where a custodian (or some other financial institution) acts as a central registry are not desirable.

### 2.3.7 Trading

An important desired feature is the ability to execute grouped trades at the same price for the various accounts of a fund manager. The level of competition amongst brokers

is also measured by the number of active brokers, the presence of global brokers ensuring high quality services and competitive fees.

### 2.3.8 Transferability

There are significant cost savings and efficiency gains associated with the possibility of off-exchange transactions and "in-kind" transfers. These are important in case of manager transitions, mergers of funds and in the creation and redemptions of ETF shares, an increasingly important segment of the investment management industry.

### 2.3.9 Stock Lending/Short Selling

The existence of active stock lending and short selling practices has become a clear standard in Developed Markets in support of direct hedging practices and quantitative asset management. More broadly, they have become a recognized ingredient in the efficiency of markets, by allowing arbitrage between different instruments (futures, ETFs, etc.).

The existence of rules and regulations governing these activities is not a sufficient condition to meet international standards. Stock lending and short selling activities also need to be efficient and well tested.

## 2.4 Availability of Investment Instruments

Investors increasingly use a variety of investment instruments, such as exchange traded funds, futures, options, swaps and structured products, onshore and offshore, as a complement to direct equity investment to the point that these have become an integral part of their investment processes. Today, the availability of such instruments has become critical to international investors for a number of their investment activities such as gaining exposure to markets, hedging of investments, equitization of cash positions or overlay strategies. Hence, it is expected that stock exchanges, which often have legal or natural monopolies, would not impose clauses in their provision of stock market data, such as securities' prices, that could lead directly or indirectly to restricting the availability of investment instruments globally. These clauses typically restrict investors' access to derived stock exchange information, data and products, including, for example, the provision of independently calculated indexes or the creation of investment instruments based on such indexes. In addition, the imposition of these types of clauses can result in global or regional investment instruments breaching local market rules, regulations or other restrictions. The existence of these types of practices will lead to a negative assessment.



## 2.5 Stability of Institutional Framework

Long term investors make long term commitments to the market of a country and hence stability is very important to them. The track record of government interventions and the current level of foreign investment restrictions are used as indicators of the stability of the “free-market” economic system. This assessment is not a forward-looking statement but rather, it considers a country’s history as an indicator of a potential risk that foreign investors may be impacted by discriminatory measures in times of crisis.

### 3 Review Summary

The MSCI Global Market Accessibility Review provides an assessment of each individual market as well as a summary of changes in market accessibility across markets. The methodology applied by MSCI for this review is consistent with the prior year review.

Although in general, Developed Markets continue to register good market accessibility levels, exceptions are found under openness to foreign ownership, market organization and some on market infrastructure level, as shown in Exhibit 1.

Emerging and Frontier Markets continue to follow a similar distribution for levels of openness to foreign ownership, ease of capital inflows/outflows, market entry and market organization. The market infrastructure criterion in Frontier Markets continues to exhibit the most shortcomings with most of the issues concentrated in stock lending and short selling.

Exhibit 1: Summary Assessment Table (number of countries)

	Developed Markets			Emerging Markets			Frontier Markets			Standalone Markets		
	++	+	-/?	++	+	-/?	++	+	-/?	++	+	-/?
Openness to foreign ownership												
Investor qualification requirement	23	-	-	23	3	1	21	2	-	13	-	-
Foreign ownership limit (FOL) level	21	2	-	13	5	9	21	-	2	12	-	1
Foreign room level	20	1	2	20	-	7	22	-	1	13	-	-
Equal rights to foreign investors	22	1	-	3	20	4	10	12	1	8	5	-
Ease of capital inflows / outflows												
Capital flow restriction level	23	-	-	23	3	1	18	4	1	10	-	3
Foreign exchange market liberalization level	23	-	-	11	8	8	9	6	8	3	5	5
Efficiency of the operational framework												
Market entry												
Investor registration & account set up	23	-	-	9	11	7	9	9	5	5	4	4
Market organization												
Market regulations	23	-	-	12	15	-	13	10	-	5	5	3
Information flow	21	2	-	10	15	2	9	6	8	3	5	5
Market infrastructure												
Clearing and Settlement	22	1	-	5	14	8	4	10	9	3	3	7
Custody	23	-	-	23	4	-	17	3	3	5	2	6
Registry / Depository	23	-	-	24	3	-	19	3	1	7	4	2
Trading	23	-	-	22	5	-	8	6	9	3	2	8
Transferability	23	-	-	9	9	9	4	4	15	3	2	8
Stock lending	22	1	-	8	8	11	-	-	23	-	-	13
Short selling	21	2	-	4	11	12	-	-	23	-	-	13
Availability of Investment Instrument	23	-	-	20	-	6	10	-	-	2	-	-
Stability of institutional framework	23	-	-	5	16	6	-	17	6	2	8	3

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

Availability of Investment Instrument for some Frontier and Standalone Market countries is still being assessed.

### 3.1 Developed Markets

In the case of most Developed Markets, there have been few substantial changes in the past year. The trend of further aligning market settlement cycles across the globe continued with Singapore migrating its settlement cycle from T+3 to T+2 in December 2018, while Japan is still expected to move its settlement cycle to T+2 in July 16, 2019.

In the context of Brexit, on March 1, 2019, the European Securities and Markets Authority (ESMA) announced that, should the UK leave the EU with no clear “Withdrawal Agreement”, the Central Securities Depository (CSD) established in the UK – Euroclear UK and Ireland Limited – would be recognized as a third country CSD to provide its services in the EU and continue to serve Irish securities. MSCI is continuously monitoring the developments around Brexit and will provide further communication as necessary.

Hong Kong published the mid-term strategic plan for its market, which includes expanding Stock Connect to cover more stocks and Exchange Traded Funds and roll out a new post-trade platform that would consolidate all clearing houses, improving the operational efficiencies in the market. In addition, the plan also contains the launch of Client Connect, which would provide a unified platform for all brokers, clearing participants and issuers to securely access all HKEX services, digitize client workflows and encourage straight through processing.

Japan also released its strategic plan for the next three years, which includes the enhancement of corporate governance among listed companies, improving the rules for Exchange Traded Funds and building a new system for disseminating information.

### 3.2 Emerging Markets

In China, the State Council doubled the quota for the Qualified Foreign Institutional Investor (QFII) from USD 150 billion to USD 300 billion on January 14, 2019 and the China Securities Regulatory Commission (CSRC) launched a consultation on February 1, 2019 to revise some provisions of the QFII and Reminbi Qualified Foreign Institutional Investor (RQFII) programs. Among the proposals for the QFII/RQFII are: removal of quantitative criteria for its quota, consolidation of the existing separate schemes so that foreign institutions would only need to submit one license application, simplification of its application documents and expansion of the scope of investments to include derivatives, private investment funds and securities lending. On February 15, 2019, CSRC removed the weekly reporting requirements for custodians, the quarterly reporting requirement for QFIIs/RQFIIs and both types of Investors will submit their annual reports to the CSRC through their custodian bank.

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In March 2019, the People's Bank of China (PBoC) also announced that it aims to further open up the financial sector through continued reforms made on the Renminbi (RMB) exchange rate formation mechanism and further improvements in the Stock Connect program and QFII regulations, among others.

Some key areas of market accessibility constraints, including restrictions on access to hedging and derivatives instruments, the short settlement cycle of China A shares, the trading holidays of Stock Connect and the availability of an Omnibus trading mechanism, however, remain.

In India, to address international institutional investors' concern over Foreign Portfolio Investors (FPI) Regulations, on May 24, 2019 the Securities and Exchange Board of India (SEBI) launched a consultation covering topics that include, among others, liberalizing FPI limits, fast tracking registration for Multiple Investment Managers (MIM), allowing FPIs to conduct off-market transactions to a domestic investor and clarifications around the KYC requirements.

The Stock Exchange of Thailand launched the first phase of its regulatory reforms as part of its strategic plan for the next three years on March 21, 2019. Among the regulatory reforms are to amend listing and disclosure rules to reduce duplication, and permitting a temporary trading suspension on a listed company in case of a failure to disclose material information, submit financial statements, or an adverse auditor opinion on financial statements.

In the Gulf Cooperation Council (GCC) region, faced with increasing compliance costs and downsizing of some international banks, the Arab Monetary Fund announced its plans to create an independent regional body to clear and settle payment systems among its members. The system is expected to start operating by 2020.

The Saudi Stock Exchange (Tadawul) continued its program in improving its market infrastructure by launching its Central Counterparty Clearing House (CCP) on May 2, 2018. Work on the regulatory framework has already begun to enable the CCP to commence operations, which is expected by the second half of 2019.

In addition, the Saudi Arabian Capital Market Authority (CMA) eased further requirements to open investment accounts in Saudi Arabia. For example, effective on November 26, 2018, establishments such as Qualified Foreign Financial Institutions (QFFIs), GCC companies and other International organizations/institutions with legal presence in Saudi Arabia will no longer need CMA's approval to open investment accounts.

Furthermore, Saudi Arabia's Securities Depository Center Company (EDAA) has launched an enhancement on its system that allows cross trades for the same

investor's National Investor Number (NIN) and for sub-custodians to reject unmatched trades using the investor's NIN as the rejection criteria instead of the order numbers.

In the United Arab Emirates, the Dubai Financial Market (DFM) completed the formation of Dubai Central Clearing & Depository Holding LLC, which will act as an umbrella company for the newly formed Dubai Central Securities Depository LLC and Dubai Clear LLC. The plan is to make Dubai Central Securities Depository LLC the central securities depository for DFM, while Dubai Clear LLC as the central counterparty (CCP).

Argentine Peso came under pressure due to economic and political uncertainty, but Argentina kept its foreign exchange market liberalized and no capital or foreign exchange controls were imposed.

Similar to Developed Markets, there has also been an ongoing trend within Emerging Markets to shift settlement cycles from T+3 to T+2. For example, Indonesia on November 21, 2018, Malaysia on April 29, 2019 and Brazil on May 27, 2019 migrated their settlement cycles from T+3 to T+2. Colombia is also considering a potential migration from T+3 to T+2 in September 2019.

### 3.3 Frontier Markets

On January 24, 2019, Vietnam announced that it plans to set up the Vietnam Stock Exchange (VSE), which would then own both Ho Chi Minh and Hanoi Stock Exchanges. The plan also includes establishing a CCP for the Vietnam Securities Depository (VSD), implementation of a new type of trading orders, increase in the trade time and expansion of price fluctuation bands. Along with establishing the VSE, the government also announced plans to complete its legal framework to increase foreign ownership limits in sectors that do not require state ownership and promote administrative reforms to create conditions for foreign investors to access Vietnam's stock market.

Similar to many of the markets globally, Kazakhstan successfully migrated from a T+3 to a T+2 settlement cycle on March 20, 2019.

### 3.4 Standalone Markets

In Iceland, the Central Bank of Iceland gradually removed vast majority of the capital controls imposed in 2008, including lowering the Special Reserve Ratio from 40% to 20% on November 2, 2018 and completely removing it on March 6, 2019. However,

the Bank clarified that foreign exchange restrictions remained on derivatives trading for non-hedging purposes and that the offshore market for the Krona no longer exists.

On February 20, 2019, Zimbabwe announced the creation of RTGS dollar to replace the USD as legal tender.

Exhibit 2 shows the market assessment evolution from last year to date by summarizing the total number of upgrades and downgrades in various assessment categories for the analyzed markets. The number of changes is higher compared to last year with twenty-two upgrades and nine downgrades. Most of the changes were due to the reassessment of the stability of institutional framework, followed by the ratings changes related to foreign ownership limit (FOL) level and foreign room level.

Exhibit 2: Summary of Upgrades/Downgrades Table (number of countries)

	Developed Markets		Emerging Markets		Frontier Markets		Standalone Markets	
	Upgrades	Downgrades	Upgrades	Downgrades	Upgrades	Downgrades	Upgrades	Downgrades
Openness to foreign ownership								
Investor qualification requirement	-	-	-	-	-	-	-	-
Foreign ownership limit (FOL) level	1	-	2	-	2	-	-	-
Foreign room level	-	2	1	1	-	-	-	-
Equal rights to foreign investors	-	-	-	-	2	-	-	-
Ease of capital inflows / outflows								
Capital flow restriction level	-	-	-	-	-	-	-	-
Foreign exchange market liberalization level	-	-	-	1	-	-	-	1
Efficiency of the operational framework								
Market entry								
Investor registration & account set up	-	-	-	-	-	-	-	-
Market organization								
Market regulations	-	-	-	-	-	-	-	-
Information flow	-	-	-	-	1	-	-	-
Market infrastructure								
Clearing and Settlement	-	-	-	-	-	-	-	-
Custody	-	-	-	-	-	-	-	-
Registry / Depository	-	-	2	-	2	-	1	-
Trading	-	-	-	-	-	-	-	-
Transferability	-	-	-	-	1	-	-	-
Stock lending	-	-	1	-	-	-	-	-
Short selling	-	-	-	-	-	-	-	-
Availability of Investment Instrument	-	-	1	-	-	-	-	-
Stability of institutional framework	3	-	2	1	-	3	-	-
<b>Total</b>	<b>4</b>	<b>2</b>	<b>9</b>	<b>3</b>	<b>8</b>	<b>3</b>	<b>1</b>	<b>1</b>

There were four upgrades and two downgrades in the Developed Markets, while there were nine upgrades and three downgrades in the Emerging Markets. In the Frontier Markets, there were eight upgrades and three downgrades due to stability of institutional framework. There was one upgrade and one downgrade among the Standalone Markets.

Exhibits 3, 4, 5 and 6 details the upgrades and downgrades observed across measurement levels for Developed, Emerging, Frontier and Standalone Market countries, respectively. A total of twenty-six countries exhibited changes in one or more measures.

### Exhibit 3: Summary of Upgrades/Downgrades Table for Developed Market Countries

	Canada	Italy	Portugal	Spain	Australia
Openness to foreign ownership					
Foreign ownership limit (FOL) level	-	-	-	-	U
Foreign room level	D	-	-	D	-
Stability of institutional framework					
	-	U	U	U	-

:- No change; U: Upgrade; D: Downgrade

### Exhibit 4: Summary of Upgrades/Downgrades Table for Emerging Market Countries

	China A	Czech Republic	Egypt	Greece	Malaysia
Openness to foreign ownership					
Foreign ownership limit (FOL) level	-	-	U	-	U
Foreign room level	D	-	-	-	-
Efficiency of the operational framework					
Market infrastructure					
Registry / Depository	-	U	-	-	-
Stock lending	-	-	-	-	U
Stability of institutional framework					
	-	-	-	U	-

:- No change; U: Upgrade; D: Downgrade

	Qatar	Saudi Arabia	Thailand	Turkey	United Arab Emirates
Openness to foreign ownership					
Foreign room level	U	-	-	-	-
Ease of capital inflows / outflows					
Foreign exchange market liberalization I	-	-	-	D	-
Efficiency of the operational framework					
Market infrastructure					
Registry / Depository	-	-	-	-	U
Availability of Investment Instrument	-	U	-	-	-
Stability of institutional framework					
	-	-	U	D	-

:- No change; U: Upgrade; D: Downgrade



**Exhibit 5: Summary of Upgrades/Downgrades Table for Frontier Market Countries**

	Croatia	Kuwait	Romania	Mauritius	Tunisia
<b>Openness to foreign ownership</b>					
Foreign ownership limit (FOL) level	-	U	-	-	-
Equal rights to foreign investors	-	-	-	U	-
<b>Efficiency of the operational framework</b>					
<b>Market infrastructure</b>					
Registry / Depository	U	U	-	-	-
Transferability	-	-	U	-	-
<b>Stability of institutional framework</b>					
-: No change; U: Upgrade; D: Downgrade					

	Bahrain	Lebanon	Oman	Bangladesh
<b>Openness to foreign ownership</b>				
Foreign ownership limit (FOL) level	U	-	-	-
Equal rights to foreign investors	U	-	-	-
<b>Efficiency of the operational framework</b>				
<b>Market organization</b>				
Information flow	-	-	U	-
<b>Stability of institutional framework</b>				
-: No change; U: Upgrade; D: Downgrade				

**Exhibit 6: Summary of Upgrades/Downgrades Table for Standalone Market Countries**

	Bulgaria	Palestine
<b>Ease of capital inflows / outflows</b>		
Foreign exchange market liberalization level	-	D
<b>Market infrastructure</b>		
Registry / Depository	U	-
-: No change; U: Upgrade; D: Downgrade		

## 4 Developed Markets

The following comments should be read in conjunction with the country-by-country assessment results that can be found on pages 62 and 63.

### 4.1 Americas

#### 4.1.1 Canada

*Foreign Ownership Limits:* Canada exhibits relatively stringent foreign ownership limitations compared to most Developed Markets. The broadcasting, telecommunication and transportation industries are subject to foreign ownership limits ranging from 25 percent to 49 percent. In addition, income trusts are generally also subject to a foreign ownership limit of 49 percent. Currently, these limitations affect more than three percent of the Canadian equity market.

#### **Downgrade**

*Foreign Room Level:* “++” to “+”. More than 0.3 percent of the MSCI Canada IMI is impacted by low foreign room.

#### 4.1.2 USA

*Foreign Ownership Limits:* Airline companies are subject to a 25 percent foreign ownership limit. However, this did not result in a negative assessment due to the very limited impact of these ownership limits on the US market.

### 4.2 Europe, Middle East and Africa

European airline companies are in general subject to a 50 percent foreign ownership limit for non-European investors but the impact on the different markets is very limited, with the exception of Ireland. Consequently, the presence of these ownership limits did not result in any negative assessments for the individual countries.

#### 4.2.1 Ireland

*Foreign Ownership Limits:* Ryanair Holdings is subject to the 50 percent foreign ownership limit for EU investors on European airline companies. Currently, this affects more than three percent of the Irish equity market.

*Foreign Room Level:* More than one percent of the MSCI Ireland IMI is impacted by low foreign room due to the adjustment factor applied to Ryanair Holdings.

#### 4.2.2 Israel

*Information Flow:* Corporate actions information is occasionally incomplete or not always disclosed in a timely manner.

*Clearing and Settlement:* The settlement cycle is set at T+1 and the DVP mechanism is different from international standards. Difference in official trading days from international standards is no longer considered in the ratings.

#### 4.2.3 Italy

##### **Upgrade**

*Stability of institutional framework:* "+" to "++". There have been no known interventions from the government that challenged the stability of the "free-market" economy in recent years.

#### 4.2.4 Portugal

*Stock Lending:* Is restricted to certain number of securities.

*Short Selling:* Is allowed but is restricted to certain number of securities.

##### **Upgrade**

*Stability of institutional framework:* "+" to "++". There have been no known interventions from the government that challenged the stability of the "free-market" economy in recent years.

#### 4.2.5 Spain

*Short Selling:* Is allowed but is not an established market practice.

##### **Upgrade**

*Stability of institutional framework:* "+" to "++". There have been no known interventions from the government that challenged the stability of the "free-market" economy in recent years.

##### **Downgrade**

*Foreign Room Level:* "++" to "-/?". More than one percent of the MSCI Spain IMI is impacted by low foreign room due to the adjustment factor applied to International Airlines Group.

## 4.3 Asia Pacific

### 4.3.1 Australia

#### ***Upgrade***

*Foreign Ownership Limits:* “+” to “++”. The telecommunication and transportation industries are partially not investable for foreign investors. However, this no longer results in a negative assessment due to the very limited impact of these ownership limits on the Australian market.

### 4.3.2 Japan

*Foreign Ownership Limits:* The airlines, media and telecommunications industries are impacted by foreign ownership limits. These limitations represent less than three percent of the Japanese equity market.

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English. In addition, Japan is the only Developed Market where companies’ corporate governance standards have often been questioned by international institutional investors.

*Information Flow:* Detailed stock market information is in general disclosed in a timely manner but not always in English. This type of information is either translated with a significant time lag or not translated at all. In addition, Japanese dividends are usually declared in advance by companies but the effective dividend amount may be announced after the ex-date of the dividend which is uncharacteristic of Developed Markets.

## 5 Emerging Markets

The following comments should be read in conjunction with the country-by-country assessment results that can be found on pages 64 and 65.

### 5.1 Americas

#### 5.1.1 Argentina

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is an absence of an efficient offshore currency market.

*Investor Registration & Account Setup:* All documents must be filed in Spanish.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is no nominee status in the market. Overdraft facilities remain prohibited.

*Trading:* Limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are restricted to domestic investors.

*Availability of Investment Instruments:* Restrictions imposed on the use of stock market data have led to limited availability of investment instruments.

*Stability of Institutional Framework:* There have been instances of government interventions that challenged the stability of the “free-market” economy, including with respect to investment activities of foreign investors.

#### 5.1.2 Brazil

*Foreign Ownership Limits:* Foreign investors are limited to purchasing non-voting shares (PN) of Brazilian banks. Banco do Brasil is the only exception (foreign investors are allowed to invest in up to 30 percent of the voting capital of this bank) In addition, the media and transportation industries are subject to foreign ownership limits of 49

and 20 percent, respectively. These limitations affect more than three percent of the Brazilian equity market.

*Equal Rights to Foreign Investors:* Foreign investors are in general limited to the non-voting shares of Brazilian banks and, hence, do not have equal voting rights compared with domestic investors. The general segregation between voting and non-voting shares also negatively impacts the voting rights of minority shareholders due to their limited access to the voting shares. Effective on December 1, 2011, the tax on investment in equities levied for foreign investors of two percent was eliminated. As a reminder, the tax was designed to slow the appreciation of the Brazilian currency and to avoid speculation. Finally, company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Investor Registration & Account Setup:* Registration is mandatory and all foreign investors need to appoint a legal and tax representative as well as obtain approval from the Securities and Exchange Commission of Brazil (CVM) prior to entering the market.

*Market Regulations:* Not all regulations can be found in English.

*Clearing and Settlement:* There is an absence of true omnibus structures in the market. Overdraft facilities are prohibited.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Transferability:* In-kind transfers are prohibited.

*Availability of Investment Instruments:* Restrictions imposed on the use of stock market data have led to limited availability of investment instruments.

### 5.1.3 Chile

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Capital Flow Restriction Level:* Due to some administrative requirements, repatriation of funds can take up to two weeks after a minimum period of investment.

*Foreign Exchange Market Liberalization Level:* There is no offshore deliverable currency market.

*Investor Registration & Account Setup:* Registration is mandatory and foreign investors need to obtain a tax ID and provide additional documents to set up local accounts (e.g., power of attorney and letter of good standing from investor's local authority) depending on the registration mechanism chosen by the foreign investor. The process to set up accounts may take up to 15 days.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Transferability:* In-kind transfers and off-exchange transactions are allowed but are difficult to execute as they are not an established market practice.

*Stock Lending:* Is allowed but is not an established market practice due to collateral requirements (e.g., 125 percent of the value of the lending amount must be pledged).

*Short Selling:* Is allowed but is not an established market practice due to the limited capacity of the stock lending market and the complex tax system in Chile.

#### 5.1.4 Colombia

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Capital Flow Restriction Level:* Due to some administrative requirements, repatriation of funds can take up some time to be cleared.

*Foreign Exchange Market Liberalization Level:* The offshore market is restricted and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions and registered with the Central Bank).

*Investor Registration & Account Setup:* Registration is mandatory and all documents must be filed in Spanish. The registration process can take up to one week.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is no nominee concept as well as a lack of a clear legal basis for omnibus accounts.

*Custody:* In 2015, the stock exchange amended its rules and implemented a new operational model that allowed local custodians to participate in the settlement and clearing of equities. There is a low number of active custodians available to foreign investors.

*Trading:* Limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* Off-exchange transactions are prohibited. In-kind transfers are possible with certain restrictions.

*Stock Lending:* Is allowed but with some restrictions.

*Short Selling:* Is allowed and appears to be a common practice, but price restrictions in place.

*Stability of Institutional Framework:* In the recent past, the government intervened and imposed restrictions that significantly distorted capital inflows and outflows.

### 5.1.5 Mexico

*Foreign Ownership Limits:* Restrictions on foreign investment affect a significant proportion of the Mexican equity market. Foreign ownership in a number of companies is only possible through Participation Certificates (CPOs), which, in general, do not provide voting rights.

*Equal Rights to Foreign Investors:* Holders of CPOs have, in general, no voting rights and, hence, are not at par compared with domestic investors. In addition, the general segregation between voting and non-voting shares also negatively impacts the voting rights of minority shareholders due to their limited access to the voting shares.

*Investor Registration & Account Setup:* Registration is mandatory and foreign investors must have a contract with local agents.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Short Selling:* Is allowed, however, a stock lending trade must be in place in Valpre (electronic securities lending system managed by the Central Securities Depository) before a short selling transaction can be executed.

### 5.1.6 Peru

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Investor Registration & Account Setup:* Registration is mandatory, but the process is efficient. All documents, however, must be filed in Spanish.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.



*Clearing and Settlement:* Omnibus structures and nominee concept are not available. In addition, there is an absence of a real DVP system on the Lima Stock Exchange.

*Trading:* Limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* In-kind transfers are allowed but with some restrictions.

*Stock Lending:* Stock lending through the Lima Stock Exchange (BVL) is only available for highly liquid stocks included in the TVR (Tabla de Valores de Referencia) table. This lending service is not widely used. In May 2015, new regulations were introduced to upgrade the securities lending model, mainly by enabling securities to be used as collateral. A new trading platform has also been implemented to allow early settlement for securities lending.

*Short Selling:* Is allowed but is not an established market practice due to the limited capacity.

## 5.2 Europe, Middle East and Africa

### 5.2.1 Czech Republic

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Investor Registration & Account Setup:* Registration is not required, but the account setup process can take a significant amount of time.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English and there is no central source for this type of information.

*Clearing and Settlement:* Omnibus structures and nominee status are available but are not widely used.

*Stock Lending:* Is allowed but is not an established market practice due to the limited capacity.

*Short Selling:* Is allowed but is not an established market practice due to the limited capacity.

### **Upgrade**

*Registry / Depository:* “+” to “++”. Custodians can no longer act as registrar and the central registry received its license in December 2018. In addition, registration process has improved.

### **5.2.2 Egypt**

*Equal rights to foreign investors:* Company related information is not always available in English.

*Capital Flow Restriction Level:* Repatriation costs via the repatriation mechanism are relatively high.

*Foreign Exchange Market Liberalization Level:* There is a lack of efficiency on the offshore currency market. Liquidity on the onshore currency market has improved following floating of the FX rate for the Egyptian Pound in November 2016 but has remained relatively low.

*Investor Registration & Account Setup:* The existence of a restricted investors list may delay the registration process. Also, the process of setting up accounts may be lengthy.

*Market Regulations:* There is an absence of clarity in certain areas of market regulation (e.g., formally there are no foreign ownership limits but companies can impose limits in their by-laws).

*Information Flow:* Lack of robustness and enforcement of local accounting standards.

*Clearing and settlement:* There is no functioning nominee status and omnibus structures are not available. Overdraft facilities are prohibited.

*Trading:* Limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* In-kind and off-exchange transfers are prohibited.

*Stock Lending:* Is allowed but is not an established market practice due to the limited capacity.

*Short Selling:* Is allowed but is not an established market practice due to the limited capacity.

*Stability of institutional framework:* There have been instances of government interventions that challenged the stability of the “free - market” economy as illustrated by frequently changing market regulations. Country is in prolonged state of emergency since April 2017, but operations of financial institutions remain normal.

**Upgrade**

*Foreign Ownership Limit Level:* “-/?” to “+”. Telecom Egypt applies a 20 percent foreign ownership limit while a few companies are fully closed to foreign investors. Overall, the limitations affect more than three percent but less than ten percent of the Egyptian market.

**5.2.3 Greece**

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available.

*Transferability:* In-kind transfers and off-exchange transactions are restricted.

*Stock Lending:* Legislation on stock lending and borrowing was approved by the Greek Parliament in 2008. However, stock lending is not an established market practice due to the limited capacity, and it is not available as part of the false trade mechanism.

*Short Selling:* Extremely difficult and onerous short selling practices exist. A short-selling ban was implemented as part of the capital controls implemented in June 2015. The short selling ban for shares of certain credit institutions was extended until December 2015.

**Upgrade**

*Stability of institutional framework:* “+” to “++”. There have been no known interventions from the government that challenged the stability of the “free-market” economy in recent years.

**5.2.4 Hungary**

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Market Regulations:* Not all regulations, particularly recent ones, can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Registry / Depository:* There is an absence of a central registry, with some registration done by financial institutions.

*Stock Lending:* Is allowed but is not an established market practice due to the limited capacity.

*Short Selling:* Is allowed but is not an established market practice due to the limited capacity.

### 5.2.5 Poland

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is no nominee status. The use of omnibus accounts may be restricted to certain foreign entities.

*Registry / Depository:* There is an absence of a central registry, with some registration done by financial institutions.

*Transferability:* Off-exchange transactions are allowed but may be subject to a tax.

*Stock Lending:* Stock lending has become a more established market practice. A large proportion of transactions take place offshore.

*Short Selling:* Short selling has become a more established market practice, however, it may not be available for all listed securities.

### 5.2.6 Qatar

*Foreign Ownership Limits:* Listed companies are in general subject to a foreign ownership limit of 25 percent, but companies may choose to set a limit of up to 49 percent. This affects more than ten percent of the Qatari market.

*Equal Rights to Foreign Investors:* The presence of large strategic shareholders in many Qatari companies may limit the level of transparency and governance in the market.

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Clearing and settlement:* There is no functioning nominee status and omnibus structures are not available. Overdraft facilities are prohibited.

*Custody:* The operational efficiency of the DVP model has been enhanced through the introduction in May 2012 of a proper false trade mechanism (a buyer cash compensation mechanism) that includes securities lending and borrowing facilities. This has mostly eliminated the need for segregated custody and trading accounts which were previously required in order to mitigate the risk deriving from local brokers having unlimited access to trading accounts.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

*Stock Lending:* Securities lending and borrowing facilities are currently only available for use by liquidity providers and as a mechanism to prevent settlement failures.

**Upgrade**

*Foreign Room Level:* “+” to “++”. Currently, the MSCI Qatar IMI is not impacted by foreign room issues.

**5.2.7 Russia**

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is an undeveloped offshore currency market for the ruble and most foreign exchange transactions settle onshore.

*Investor Registration & Account Setup:* Registration with tax authorities is mandatory for opening a cash account. Foreign institutional investors must provide a certificate of incorporation/extract from the trade register, charter/articles of association, a list of authorized signatories, a certificate of appointment of the directors and a certificate of legal address. The full registration and account setup process may be lengthy.

*Market Regulations:* Legislation updates and related press releases are not always available in English.

*Information Flow:* Stock market information, including information related to certain corporate events, is occasionally not disclosed in a timely manner. In addition, information disclosure in English has improved but is not always readily available for all companies.

*Clearing and Settlement:* The DVP mechanism is different from international standards, and partial cash pre-funding of trades is required. An optional DVP mechanism using the Bank of Russia’s Real-Time Gross Settlement system has been introduced in 2015 but is currently not widely used.

*Registry / Depository:* There is an absence of a central registry, with some registration at issuer level.

*Trading:* Limited level of competition among brokers which can lead to relatively high trading costs.

*Stock Lending:* Stock lending is allowed and the regulatory framework was recently clarified. However, it is not an established market practice.

*Short Selling:* Short selling is allowed, but with some restrictions and it is not yet a common practice.

*Stability of institutional framework:* The geopolitical tensions may call into question the stability of the country's institutional framework.

### 5.2.8 Saudi Arabia

*Investor Qualification Requirement:* In June 2015, the Saudi Arabia equity market opened to foreign direct investment through a Qualified Foreign Financial Institutions (QFFI) program. In general, only banks, brokerage and securities firms, fund managers, insurance companies and governments and government-related entities, each of appropriate size with sufficient track records, are eligible to apply for a QFFI license. Investors from GCC countries are not subject to any qualification requirements.

*Foreign Ownership Limits:* Listed companies are subject to a foreign ownership limit of 49 percent, while a few companies are fully closed to foreign investors.

*Foreign Room Level:* The equity market is significantly impacted by foreign room issues.

*Equal Rights to Foreign Investors:* The rights of foreign investors are limited as a result of the stringent foreign ownership limits.

*Investor Registration & Account Setup:* Registration is mandatory, but the process was simplified and requirements reduced in January 2018.

*Information Flow:* In January 2017, the use of IFRS was enforced for financial reports of all listed companies and in April 2017, the New Corporate Governance regulations took effect. Some information is still available only in Arabic.

*Clearing and Settlement:* In April 2017, the settlement cycle moved from T+0 to T+2, and pre-funding requirement was eliminated. There is no nominee status and omnibus structures are not available.

*Custody:* Under the "Securities Independent Custody Model", custodians can now participate in the market settlement process and have greater control over client assets.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

*Stock Lending:* Has recently been allowed but is not yet tested.

*Short Selling:* Has recently been allowed but is not yet tested.

#### **Upgrade**

*Availability of Investment Instrument:* "+" to "++". Restrictions on real time data usage have been fully lifted.

### 5.2.9 South Africa

*Clearing and Settlement:* The settlement cycle for equities on the Johannesburg Stock Exchange moved from T+5 to T+3 in July 2016. Restrictions on the use of overdrafts may be applicable to non-residents.

*Transferability:* Off-exchange transactions and in-kind transfers are allowed but with some restrictions.

### 5.2.10 Turkey

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Stock market information is not always complete and is not always disclosed in English.

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available.

*Short Selling:* Is allowed but is not an established market practice.

*Availability of Investment Instruments:* Restrictions imposed on the use of stock market data have led to limited availability of investment instruments.

#### **Downgrade**

*Foreign exchange market liberalization level:* “++” to “+”. There have been instances of interventions by the authorities restricting the functioning of the foreign exchange market, including the delay in settlement of some foreign exchange transactions. A tax has been imposed on some foreign exchange transactions.

*Stability of institutional framework:* “+” to “-/?”. Recent events have put into question the independence of the central bank, which may call into question the stability of the country’s institutional framework.

### 5.2.11 United Arab Emirates

*Foreign Ownership Limits:* Listed companies are in general subject to a foreign ownership limit of 49 percent, but companies may choose to set a lower limit.

*Foreign Room Level:* The equity market is significantly impacted by foreign room issues.

*Equal Rights to Foreign Investors:* The rights of foreign investors are limited as a result of the stringent foreign ownership limits and some companies that do not allow foreign investors to vote.

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Clearing and settlement:* Nominee status and omnibus structures are not available.

*Custody:* The operational efficiency of the DVP model has been enhanced through the introduction in May 2013 of a proper false trade mechanism (a buyer cash compensation mechanism). This has mostly eliminated the need for segregated custody and trading accounts which were previously required in order to mitigate the risk deriving from local brokers having unlimited access to trading accounts.

*Transferability:* In-kind transfers are prohibited.

**Upgrade**

*Registry / Depositary:* “+” to “++”. Following additional analysis, the registry and depository activities are now deemed to be operating efficiently.

## 5.3 Asia Pacific

### 5.3.1 China (international)

The assessment of the accessibility of the China (international) market takes into account only the Hong Kong listed portion of the China market (e.g., H-shares, Red-Chips and P-Chips).

*Foreign Ownership Limit Level:* The proportion of Chinese companies’ share capital freely accessible to foreign investors is in general very limited. Foreign investors can acquire shares of Chinese companies primarily on the Hong Kong Stock exchange. The available portion represents on average 50 percent of the total market capitalization of Chinese companies listed in Hong Kong.

*Equal Rights to Foreign Investors:* Foreign investors have in general limited voting power due to the limited shares available to them.

*Market Regulations:* There is an absence of clarity in the regulations applying the dividend withholding tax.



### 5.3.2 China A Market

*Investor Qualification Requirement:* There is no qualification requirement for international institutional investors who choose to access the China A market via Stock Connect program. Currently, eligibility for the QFII/RQFII largely depends on the institution's asset size, governance structure and compliance record etc.

*Foreign Ownership Limits:* A-shares held by all QFIIs and RQFIIs as well as through the Stock Connect program in a listed company should not exceed 30% of the total outstanding shares of the company.

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English. In addition, the corporate governance standards of Chinese companies have been questioned by some international institutional investors.

*Capital Flow Restriction Level:* In 2016, the initial lock up period for QFIIs is shortened from one year to three months. QFII open-ended funds are permitted to repatriate on a daily basis. QFIIs separated accounts are no longer treated as closed-ended funds and enjoy daily repatriation as well. However, monthly repatriation of 20 percent of previous year end NAV remains unchanged. The aggregate quota under Shanghai-Hong Kong Stock Connect was abolished in August 2016. Further, the Northbound daily quota for each of the Shanghai Connect and the Shenzhen Connect has recently been increased to RMB52 billion effective in May 2018, quadrupling from the previous limits.

*Foreign Exchange Market Liberalization Level:* In the past few years, Chinese regulators have been actively promoting the use of offshore RMB. The RMB remained as one of the top 10 most widely used currencies as an international payment, and is recognized by the IMF as a reserve currency. The RMB is not fully convertible onshore but investors are able to tap into the offshore RMB market in Hong Kong (CNH) for securities settlement through Connect.

*Investor Registration & Account Setup:* The rating recognizes that the Shanghai- and the Shenzhen-Hong Kong Stock Connect are increasingly being utilized by investors as a preferred and effective access channel to China A shares. Since MSCI's announcement to include China A shares into the MSCI Emerging Markets Index in June 2017, the number of Special Segregated Accounts (SPSAs) has grown from less than 1,700 accounts to over 7,300 accounts in February 2018. The account opening process takes less than two weeks to complete and is efficiently managed. Although applications for QFII and RQFII have also been streamlined since June 2013, but the license and quota approval still may take up to several months to complete. QFII applicants are required to submit an investment plan and need to designate a QFII Compliance Officer within the institution. In addition, the securities regulator of QFII

applicant should have a Memorandum of Understanding with China Securities Regulatory Commission. QFII and RQFII applications can now be completed and submitted via an online platform.

*Market Regulations:* In 2016, the regulator and the stock exchanges issued policies on suspensions. In December 2018, the Shanghai and Shenzhen exchanges published detailed “Guidelines on Suspension and Resumption of Shares Trading of Listed Companies”. MSCI will continue to assess the effectiveness and enforcement of the regulations. More information can now be found in English.

*Availability of Investment Instruments:* No major restriction on the use of stock market data for financial product creation, except for the creation of Futures and Options.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is an absence of a real DVP and the current T+0 settlement cycle continues to pose operational challenges to investors.

*Transferability:* Off-exchange transactions are prohibited.

### **Downgrade**

*Foreign Room Level:* “++” to “-/?”. Adjustment factors applied due to low foreign room impact more than 1% of the MSCI China A International IMI. Also, the current threshold of disclosure of foreign holdings does not provide sufficient transparency for the upward revision of the adjustment factors.

### **5.3.3 India**

*Investor Qualification Requirement:* Effective June 2014, the Foreign Portfolio Investor (FPI) regime was introduced. Existing Foreign Institutional Investor (FII), FII sub-account and Qualified Foreign Investor (QFI) were merged into the FPI class to unify various portfolio investment routes and simplify the monitoring of foreign investment.

*Foreign Ownership Limit Level:* Most listed companies are subject to foreign ownership limits that run from zero to 74 percent. These limitations affect approximately 59 percent of the Indian equity market. The revision of Foreign Direct Investment (FDI) policy which includes increase in sectoral cap, broadening of the scope of the automatic route and the relaxation of requirements of foreign investment, is seen as a positive development.

*Foreign Room Level:* The equity market is significantly impacted by foreign room issues and there is no active formal foreign board allowing foreign investors to trade among themselves. The Central Depository Service Limited (CDSL) and National

Securities Depository Limited (NSDL) monitor foreign ownership levels and issue a warning once the levels are close to being breached.

*Equal Rights to Foreign Investors:* Rights of foreign investors are limited as a result of the stringent foreign ownership limits.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Investor Registration & Account Setup:* Registration is mandatory and subject to Securities and Exchange Board of India approval which generally takes 13 days. Existing FII and sub-account are required to convert to FPI before the validity of their current registration.

*Market Regulations:* The regulatory framework governing foreign investments in India is complex and subject to frequent changes and clarifications.

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available. In addition, overdraft facilities are prohibited.

*Transferability:* In-kind and off-exchange transfers are prohibited.

*Short Selling:* Is allowed but all transactions must be reported to the Securities and Exchange Board of India.

*Availability of Investment Instruments:* Restrictions imposed on the use of stock market data have led to limited availability of investment instruments.

#### 5.3.4 Indonesia

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* The published Indonesia Rupiah (IDR) is not a rate practically achievable by foreign investors due to frequent government interventions. In addition, there is no efficient offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* Overdraft facilities for foreign investors are prohibited.

*Transferability:* In-kind transfers are prohibited.

*Stock Lending:* Is allowed but is restricted to a fixed number of stocks and to 90-day lending contracts.

*Short Selling:* Is allowed but is restricted to a fixed number of stocks.

### 5.3.5 Korea

*Foreign Ownership Limits:* The aviation, broadcasting, telecommunication and utilities industries are impacted by foreign ownership limits. These limitations affect less than three percent of the Korean equity market.

*Foreign Room Level:* Prolonged low level of foreign room is found in major companies within the telecommunication industry, such as KT Corporation and SK Telecom.

*Equal Rights to Foreign Investors:* Information disclosure in English has improved but is not always readily available. Company related information is not always readily available in English. In addition, the corporate governance standards of Korean companies have often been questioned by international institutional investors.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market.

*Investor Registration & Account Setup:* Registration is mandatory and requires a significant amount of supporting paperwork (IRC system).

*Information Flow:* Information disclosure in English has improved but is not always readily available for all companies. In addition, Korean companies disclose dividend amounts after the ex-date of the dividends, which is different from international standards. The amendment to the "Commercial Act" to encourage companies to determine a dividend amount at a board of directors meeting could potentially help bring this more in line with the international practices. Such a change is yet to be fully assessed by international institutional investors.

*Clearing and Settlement:* The introduction of "omnibus accounts" to enable consolidated trading orders and settlements through a single account for foreign investors is seen as a positive development. However, the change is yet to be assessed by international institutional investors until the system is fully introduced in 2017. Overdraft facilities remain unavailable for securities settlement purpose.

*Transferability:* The ability to carry out in-kind transfers and off-exchange transactions remains very limited and is impractical due to the rigidity and the approval process.

*Availability of Investment Instruments:* Restrictions imposed on the use of stock market data have led to limited availability of investment instruments.

### 5.3.6 Malaysia

*Equal Rights to Foreign Investors:* Foreign investors holding shares that exceed the Foreign Ownership Limits are not treated equally in terms of voting rights compared with domestic investors holding the same shares in the same company.

*Foreign Exchange Market Liberalization Level:* There is an absence of an efficient offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions). In addition, there have been instances of interventions by the authorities restricting the functioning of the foreign exchange market.

*Transferability:* Off-exchange and in-kind transfers are allowed, but require prior approval from the stock exchange.

*Short Selling:* Is allowed but is restricted to a fixed number of stocks.

#### **Upgrade**

*Foreign Ownership Limits:* “-/?” to “+”. Industries that are of strategic importance, including the brokerage, insurance and telecommunication industries, are subject to foreign ownership restrictions ranging from 30 to 70 percent. These limitations still affect more than three percent but less than ten percent of the Malaysian equity market.

*Stock Lending:* “+” to “++”. Is allowed and is common practice.

### 5.3.7 Pakistan

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., currency can only be bought / sold through a Special Convertible Rupee Account).

*Investor Registration & Account Setup:* The process to set up accounts can take from four to five business days.

*Market Regulations:* Regulations have frequently changed over the past few years.

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available. Overdraft facilities remain prohibited.

*Stability of Institutional Framework:* There have been instances of interventions that challenged the stability of the “free-market” economy as illustrated by frequently changing market regulations.

### 5.3.8 Philippines

*Foreign Ownership Limits:* All industries are in general subject to a 40 percent foreign ownership limit. The Philippine Securities and Exchange Commission (SEC) issued in May 2013 a final policy circular on the foreign ownership limit. The limitation is applicable to voting shares whether preferred or common as well as to the total number of outstanding shares of stock, regardless of whether they are voting or non-voting.

*Foreign room level:* The equity market is significantly impacted by foreign room issues.

*Equal Rights to Foreign Investors:* Rights of foreign investors are limited as a result of the stringent foreign ownership limits.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Clearing and Settlement:* Overdraft facilities for foreign investors are prohibited.

*Stock Lending:* Mechanism for securities borrowing and lending (SBL) facility remains to be seen.

*Short Selling:* Due to the lack of SBL facility, short selling in the market remained dismal and is mostly used to cover failed market trades.

### 5.3.9 Taiwan

*Investor Qualification Requirement:* Foreign investors must formally apply for a Foreign Institutional Investor (FINI) or a Foreign Individual Investor (FIDI) qualification but the process is efficient.

*Foreign Ownership Limits:* The media, transportation, telecommunication and utilities industries are impacted by foreign ownership limits ranging from zero to 50 percent. These limitations affect more than three percent of the Taiwanese equity market.

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* The New Taiwan Dollar (TWD) is not freely convertible and in particular, there is no offshore currency market.

*Investor Registration & Account Setup:* Registration is mandatory and requires a significant amount of paperwork (ID system).

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* Overdraft facilities are not available overnight and pre-funding practices may still be used by local brokers even though the authorities implemented a T+2 DVP settlement cycle. In addition, the ID system makes it difficult for investors and brokers to use omnibus structures.

*Transferability:* Off-exchange transactions and in-kind transfers are allowed but in some cases they are difficult to use.

*Stock Lending:* Is allowed but is restricted to FINI only.

*Short Selling:* Is allowed but is restricted to designated FINI only.

### 5.3.10 Thailand

*Foreign Ownership Limits:* All industries are in general subject to a 49 percent foreign ownership limit. These restrictions affect a very large proportion of the equity market. However, foreign investors can obtain access to Thai companies through Non-Voting Depository Receipts (NVDRs).

*Foreign Room Level:* Prolonged low level of foreign room is found in Bangkok Bank, a major company within the banking industry. Also, there are certain types of issuers in other industries that are unable to issue NVDRs.

*Equal Rights to Foreign Investors:* By definition, foreign investors holding NVDRs are not treated equally in terms of voting rights compared with domestic investors holding common stock in the same company. In addition, company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is an offshore currency market but there have been instances of interventions by the authorities restricting the functioning of the foreign exchange market.

*Clearing and Settlement:* There is no nominee status in the market.

*Stock Lending:* Is allowed but restricted to the stocks included in the SET 100 Index.

*Short Selling:* Is allowed but restricted to the stocks included in the SET 100 Index and to those that meet the criteria set by the Stock Exchange of Thailand.

#### **Upgrade**

*Stability of Institutional Framework:* “-/?” to “+”. There have been no material interventions from the government that challenged the stability of the “free-market” economy in recent years.

## 6 Frontier Markets

The following comments should be read in conjunction with the country-by-country assessment results that can be found on pages 66 and 67.

Stock lending and short selling are activities that are either not developed or are completely prohibited in all Frontier Market countries and the summary does not highlight these issues on a country-by-country basis.

### 6.1 Europe, Middle East and Africa

#### 6.1.1 Bahrain

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Information Flow:* Stock market information is often not complete and often is not disclosed in a timely manner.

*Clearing and Settlement:* There is no functioning nominee status and omnibus structures are not available.

*Custody:* On February 2017, Bahrain Clear became the central depository for all securities, removing the possibility for brokers to have an unlimited access to client's securities. More time is needed to assess the impact of the changes

*Registry / Depository:* There is an absence of a central registry, with some registration done by financial institutions. Bahrain Clear is still working on becoming the central registrar for all securities.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

#### **Upgrade**

*Foreign Ownership Limits:* “-/?” to “++”. Foreign ownership limits have been lifted in almost all sectors in 2016.

*Equal Rights to Foreign Investors:* “+” to “++”. The rights of foreign investors are no longer limited as a result of lifting of the foreign ownership limits.

#### 6.1.2 Benin

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.



**Foreign Exchange Market Liberalization Level:** There is no offshore currency market.

*Investor Registration & Account Setup:* The process of setting up accounts may be lengthy.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Lack of robustness and enforcement of local accounting standards. In addition, detailed stock market information is not always available in English.

*Clearing and Settlement:* There is no nominee status in the market.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are prohibited. In-kind transfers are possible, but must be approved by the stock exchange.

### 6.1.3 Burkina Faso

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

**Foreign Exchange Market Liberalization Level:** There is no offshore currency market.

*Investor Registration & Account Setup:* The process of setting up accounts may be lengthy.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Lack of robustness and enforcement of local accounting standards. In addition, detailed stock market information is not always available in English.

*Clearing and Settlement:* There is no nominee status in the market.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are prohibited. In-kind transfers are possible, but must be approved by the stock exchange.

### 6.1.4 Croatia

*Investor Registration & Account Setup:* Registration is mandatory and the process can take up to five days. Additionally, investors are required to open segregated accounts for trading (at nominee level) and for taxation (at beneficiary owner level).

*Clearing and Settlement:* Shares of local credit institutions cannot be held under an omnibus account. In addition, there is an absence of a real DVP system on the Zagreb Stock Exchange.

*Trading:* Limited level of competition among brokers which can lead to relatively higher trading costs.

**Upgrade**

*Registry / Depository:* “+” to “++”. Under new Capital Markets Act implemented in July 2018, registration of all securities must be done only with the central registry.

**6.1.5 Jordan**

*Equal Rights to Foreign Investors:* The presence of large strategic shareholders in many Jordanian companies may limit the level of transparency and governance in the market.

*Clearing and Settlement:* There is no functioning nominee status and omnibus structures are not available.

*Trading:* There is a limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

**6.1.6 Kazakhstan**

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and the Kazakh lower house approved in 2009 a bill that could potentially lead to temporary foreign currency restrictions. In addition, liquidity on the onshore currency market has been relatively low in the recent past.

*Investor Registration & Account Setup:* Registration is mandatory and the process can take up to two weeks.

*Information Flow:* There is a lack of robustness in, and enforcement of, local accounting standards.

*Clearing and Settlement:* The settlement cycle for equities on the Kazakhstan Stock Exchange is set at T+0 and prefunding of trades is required.

*Trading:* There is a limited level of competition among brokers which can lead to relatively higher trading costs.

*Transferability:* In-kind transfers with change of beneficial ownership are possible either through the central depository or the central registry. However, off-exchange transactions are prohibited.

*Stability of Institutional Framework:* There have been instances of government interventions that challenged the stability of the “free-market” economy.

### 6.1.7 Kenya

*Capital Flow Restriction Level:* A certificate of foreign currency inflow is required for any capital repatriation.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market. In addition, liquidity on the onshore currency market has been relatively low in the recent past.

*Investor Registration & Account Set Up:* The process to set up accounts can take up to one week.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Clearing and Settlement:* Overdrafts are not allowed for a tenor of less than one year and pre-funding is required. In addition, there are operational concerns related to the use of omnibus accounts.

*Registry / Depository:* There is an absence of a central registry, with some registration done by financial institutions.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### 6.1.8 Kuwait

*Equal Rights to Foreign Investors:* The presence of large strategic shareholders in many Kuwaiti companies may limit the level of transparency and governance in the market.

*Investor Registration & Account Setup:* Registration is mandatory and the full process can take about two weeks.

*Information Flow:* Stock market information is often not complete and is often not disclosed in a timely manner.

*Transferability:* In-kind transfers and off-exchange transactions are allowed and the process is being improved by Boursa Kuwait. More time is needed to assess the efficiency of the process.

### **Upgrade**

*Foreign Ownership Limits:* “-/?” to “++”. Foreign ownership limits on the banking industry were lifted in December 2018. As such, the Kuwait equity market is no longer subject to Foreign ownership limits.

*Registry / Depository:* “+” to “++”. Following additional analysis, the registry and depository activities are now deemed to be operating efficiently.

### **6.1.9 Lebanon**

*Investor Qualification Requirement:* Israeli nationals are formally prohibited from investing in Lebanese companies.

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign investors are not allowed to hold Lebanese pound balances).

*Investor Registration & Account Setup:* Registration is mandatory and may take up to five days.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is no functioning nominee status and omnibus structures are not available. Overdraft facilities remain prohibited.

*Custody:* Segregated custody and trading accounts are required in order to mitigate the risk deriving from local brokers having unlimited access to trading accounts. In addition, there is an absence of global custodians in the market.

*Registry / Depository:* There is an absence of a central registry, with some registry at issuer level. Not all listed shares are dematerialized.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### **Downgrade**

*Stability of Institutional Framework:* “+” to “-/?”. The political situation in the country may call into question the stability of its institutional framework.

### 6.1.10 Mauritius

*Foreign Exchange Market Liberalization Level:* The onshore currency market is not liquid. No official exchange rate is published and only indicative rates are published daily by commercial banks. In addition, there is no offshore currency market.

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

#### **Upgrade**

*Equal Rights to Foreign Investors:* “+” to “++”. Rights of foreign investors improved following the removal of the foreign ownership limits.

### 6.1.11 Morocco

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Capital Flow Restriction Level:* In general, there are no capital flow restrictions but the absence of evidence of foreign currency inflows may result in restrictions on the capital outflows. Repatriation has to be performed only using convertible Moroccan Dirham accounts. Investments funded by inward remittance are required to be reported to the Exchange Control Office.

*Foreign Exchange Market Liberalization Level:* There are restrictions on the offshore currency market.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is no legal recognition of nominee status. In addition, there are restrictions on overdraft facilities for foreign investors. In September 2015, an IT platform upgrade was implemented, paving the way for security segregation at the client level in Maroclear.

*Trading:* The limited level of competition among brokers may lead to relatively higher trading cost.

*Transferability:* Off-exchange transactions are prohibited.

### 6.1.12 Nigeria

*Equal Rights to Foreign Investors:* In general, the rights of minority shareholders are negatively impacted by the scarcity of relevant information.

*Capital Flow Restriction Level:* A certificate of foreign currency inflow is required for any capital repatriation.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions and interbank foreign exchange rates are set by the authorities). In addition, challenges in the foreign exchange market worsened as the liquidity on the onshore currency market had been persistently very low. This resulted in very significant delays in currency conversions. The Central Bank of Nigeria introduced the I&E Window in April 2017 which aims to provide liquidity to investors. MSCI is closely monitoring the effectiveness of this Window.

*Market Regulations:* Regulations may distort the free functioning of stock market activity (e.g., narrow and frequently changing trading limits). In addition, not all relevant information is readily available to foreign investors.

*Information Flow:* There is a lack of robustness and enforcement of local accounting standards. In addition, the availability of shareholder information for Nigerian banks is limited.

*Registry / Depository:* There is an absence of a central registry, with some registry at issuer level.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

*Stability of Institutional Framework:* There have been instances of government interventions that challenged the stability of the “free-market” economy as illustrated by frequently changing market regulations.

### 6.1.13 Oman

*Foreign Ownership Limits:* Listed companies are in general subject to a foreign ownership limit of 70 percent but companies may choose to set a lower limit.

*Equal Rights to Foreign Investors:* The presence of large strategic shareholders in many Omani companies may limit the level of transparency and governance in the market.

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Information Flow:* Stock market information is often not complete as well as not disclosed in a timely manner.

*Clearing and Settlement:* There is no functioning nominee status and omnibus structures are not available.

*Custody:* There is a risk deriving from local brokers having unlimited access to trading accounts. In addition, there are only two active custodians available to foreign investors.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

**Upgrade**

*Information Flow:* “-/?” to “+”. The level of stock market information has improved and financial reports have been disclosed in a timely manner. More time is needed to assess the quality of company disclosures.

**6.1.14 Romania**

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Clearing and Settlement:* There is no nominee status and omnibus structures are available, but with special conditions.

**Upgrade**

*Transferability:* “-/?” to “+”. In September 2018, the system for transactions of in-kind transfers and off-exchange trades has been improved and restrictions have been removed. More time is needed to assess the impact of the changes

**6.1.15 Senegal**

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market.

*Investor Registration & Account Setup:* The process of setting up accounts may be lengthy.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Lack of robustness and enforcement of local accounting standards. In addition, detailed stock market information is not always available in English.

*Clearing and Settlement:* There is no nominee status in the market.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are prohibited. In-kind transfers are possible, but must be approved by the stock exchange.

### 6.1.16 Serbia

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Capital Flow Restriction Level:* Due to some administrative requirements, repatriation of funds can take up to two weeks.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market.

*Investor Registration & Account Setup:* Registration is mandatory and all foreign investors need to appoint a legal and tax representative. All documents, however, must be filed in Serbian.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* Overdraft facilities are restricted to foreign banks.

*Trading:* There is a limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are allowed but require approval from the authorities.

### 6.1.17 Slovenia

*Trading:* There is a limited level of competition among brokers which can lead to relatively higher trading costs.

### 6.1.18 Tunisia

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English. In addition, the rights of foreign investors are limited as a result of the stringent foreign ownership limits.



**Foreign Exchange Market Liberalization Level:** There is no offshore currency market.

**Market Regulations:** Not all regulations can be found in English.

**Information Flow:** There is a lack of robustness in, and enforcement of, local accounting standards. In addition, detailed stock market information is not always disclosed in English.

**Clearing and Settlement:** There is no nominee status and omnibus structures are not available. Only short-term overdrafts are allowed; however, this is not market practice.

**Custody:** There is no formal segregation between custody and trading accounts. In addition, there is only one active custodian available to foreign investors.

**Trading:** There is a very limited level of competition among brokers which can lead to high trading costs.

**Transferability:** In-kind transfers and off-exchange transactions are prohibited.

### **Downgrade**

**Stability of institutional framework:** "+" to "-/?". Inability to enforce some provisions of the country's Constitution has put into question the stability of the institutional framework.

## **6.2 Asia Pacific**

### **6.2.1 Bangladesh**

**Capital Flow Restriction level:** The repatriation of the principal amount invested in listed securities is restricted within the first year remittance.

**Foreign Exchange Market Liberalization Level:** There is no efficient offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

**Investor Registration & Account Setup:** There is a need to apply for a registration certificate with a relatively heavy documentation requirement.

**Market Regulations:** Not all regulations can be found in English.

**Clearing and Settlement:** There is no nominee status and omnibus structures are not available. Overdraft facilities are prohibited.

**Custody:** There are only two active custodian available to foreign investors.

*Trading:* There is a limited level of competition among brokers which can lead to higher trading costs.

*Transferability:* Off-exchange transactions are prohibited.

**Downgrade**

*Stability of institutional framework:* “+” to “-/?”. The political situation and inability of the country to enforce regulations has put into question the stability of the institutional framework.

**6.2.2 Sri Lanka**

*Investor Qualification Requirement:* International institutional investors are required to obtain an approval from the Sri Lanka Securities Exchange Commission (SEC) prior to entering the market.

*Foreign Exchange Market Liberalization Level:* There are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Investor Registration & Account Setup:* Registration is mandatory and the account setup requires approval from the Central Depository for Securities. The full process can last up to three weeks.

*Clearing and Settlement:* There is an absence of a real DVP system and overdraft facilities on the Colombo Stock Exchange.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are prohibited and in-kind transfers require prior approval from the SEC.

**6.2.3 Vietnam**

*Foreign Ownership Limits:* Companies in certain conditional sectors and sensitive sectors are subject to the relevant Foreign Ownership Limit.

*Foreign Room Level:* The equity market is significantly impacted by foreign room issues.

*Equal Rights to Foreign Investors:* Some company related information is not always readily available in English. In addition, the rights of foreign investors are limited as a result of the stringent foreign ownership limits imposed on both total as well as individual foreign investors.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be linked to security transactions).

*Investor Registration & Account Setup:* Registration is mandatory and account setup requires the approval of the VSD.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Stock market information is not always disclosed in English and occasionally is not detailed enough.

*Clearing and Settlement:* There is no formal clearing house and the VSD acts as the clearing agent. In addition, there are no overdraft facilities and the prefunding of trades is required.

*Transferability:* Off-exchange transactions and in-kind transfers require prior approval from the State Securities Commission of Vietnam.

## 7 Standalone Markets

The following comments should be read in conjunction with the country-by-country assessment results that can be found on page 68.

Standalone Markets include all markets covered by MSCI but not included in the MSCI International Indexes. This category includes potential candidates for the MSCI Frontier Markets Indexes that currently do not meet the minimum liquidity requirements as well as markets that are currently partially or fully closed to foreign investors.

Stock lending and short selling are activities that are either not developed or completely prohibited in all Standalone Market countries and the summary does not highlight these issues on a country-by-country basis.

### 7.1 Americas

#### 7.1.1 Jamaica

*Market Regulations:* Information on regulations is not centralized.

*Investor Registration & Account Setup:* There are challenges associated with opening accounts due to the absence of active local custodians.

*Clearing and Settlement:* There is no formal clearing house and the Jamaica Central Securities Depository Limited acts as the clearing agent.

*Custody:* Absence of active local custodians.

*Registry / Depository:* There is an absence of a central registry, with some registration done by financial institutions.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are limited and not an established market practice.

#### 7.1.2 Panama

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Investor Registration & Account Setup:* The process of setting up accounts may be lengthy.

*Market Regulations:* Not all regulations can be found in English.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* Prefunding of trades is required.

*Custody:* There is only one active custodian available to foreign investors.

*Registry / Depository:* There is an absence of a central registry, with some registry at issuer level.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### 7.1.3 Trinidad and Tobago

*Foreign Exchange Market Liberalization Level:* There is an absence of an offshore currency market and there are constraints on the onshore currency market (e.g., foreign exchange transactions must be executed by the local custodian).

*Investor Registration & Account Setup:* Registration is mandatory and approval from the Ministry of Finance is required. The process can take up to five days.

*Market Regulations:* Information on regulations is not centralized.

*Information Flow:* Stock market information is occasionally not disclosed in a timely manner.

*Clearing and Settlement:* There is no nominee status and omnibus structures are not available. Overdraft facilities remain prohibited.

*Custody:* The Trinidad and Tobago Central Depository is the only registered custodian.

*Registry / Depository:* There is an absence of a central registry, with some registry at issuer level. It can take up to eight weeks for investors to have their shares registered.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are prohibited and in-kind transfers are restricted.

## 7.2 Europe, Middle East and Africa

### 7.2.1 Bosnia and Herzegovina

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market.

*Market Regulations:* Not all regulations can be found in English. Financial system is quite fragmented as the country remains having two semi-autonomous political entities, judicial system and stock exchange.

*Information Flow:* Stock market information, including dividend information, is often not complete and is not always disclosed in English. There is no central source for this type of information.

*Clearing and Settlement:* Prefunding of trades is required by the Registry of Securities of the Federation of Bosnia and Herzegovina.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### 7.2.2 Botswana

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market. In addition, liquidity on the onshore currency market has been relatively low in the recent past.

*Market Regulations:* Regulations are not always enforced by the financial authority (e.g., the use of omnibus structures is permitted in practice even if regulations do not formally allow them).

*Information Flow:* Stock market information is occasionally not disclosed in a timely manner.

*Clearing & Settlement:* There is an absence of a real DVP system and true omnibus structures.

*Registry / Depository:* There is an absence of a central registry, with some registry at issuer level.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### 7.2.3 Bulgaria

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market.

*Investor Registration & Account Setup:* The process to set up an account is lengthy due to the requirement to provide several documents in notarized form.

*Information Flow:* Stock market information is occasionally not disclosed in a timely manner and there is no central source of such information.

*Custody:* There is no formal segregation between custody and trading accounts.

#### **Upgrade**

*Registry / Depository:* “+” to “++”. Efficiency in the registration process improved following introduction of a new system in November 2017. The process became fully compliant with the reporting requirements of MiFID II in January 2018.

### 7.2.4 Ghana

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market. In addition, liquidity on the onshore currency market has been relatively low in the recent past.

*Investor Registration & Account Setup:* Registration is mandatory and requires a significant amount of manual paperwork. The process can last up to ten days.

*Information Flow:* Lack of robustness and enforcement of local accounting standards.

*Clearing and Settlement:* There is an absence of a true DVP system.

*Custody:* In March 2016, Ghana Central Securities Depository migrated to a new platform and merged the custody and brokerage accounts into a single account structure. However, more time is needed to assess the efficiency of the process.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

### 7.2.5 Iceland

*Capital Flow Restriction Level:* Repatriation proceeds must be linked to security transactions and it has to be reported to the central bank.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market and there are some constraints on the onshore currency market.

*Investor Registration & Account Set Up:* Registration is required, but the process is efficient.

### 7.2.6 Palestine

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Investor Registration & Account Setup:* Registration is mandatory but the process is efficient.

*Information Flow:* Detailed stock market information is not always disclosed in English.

*Clearing and Settlement:* There is an absence of a real DVP system in the Palestine Exchange. Overdraft facilities for foreign investors are prohibited. In addition, there is no nominee status and omnibus structures are not available.

*Custody:* Presence of only one active custodian.

*Trading:* There is a limited level of competition among brokers which can lead to higher trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

*Stability of Institutional Framework:* There is a major geo-political risk. In addition, there has been recent instability in the domestic political landscape.

#### **Downgrade**

*Foreign Exchange Market Liberalization Level:* “++” to “-/?”. All transactions are carried out in foreign currency as the country does not issue its own currency.

### 7.2.7 Ukraine

*Equal Rights to Foreign Investors:* Company related information is not always readily available in English.

*Capital flow restriction level:* On May 2017, the National Bank of Ukraine allowed repatriation of funds received from the sale of equity securities issued by Ukrainian entities and from dividends. However, more time is needed to assess ease of repatriation.

*Foreign Exchange Market Liberalization Level:* There is no offshore currency market. In addition, liquidity on the onshore currency market has been relatively low in the recent past.



*Investor Registration & Account Setup:* Registration is mandatory and requires a significant amount of manual paperwork. The process is difficult and requires a lot of time to complete.

*Market Regulations:* Regulations are not fully enforced by the supervisory authority resulting in many investors trading over the counter. In addition, not all relevant information can be found in English.

*Information Flow:* Stock market information is often not complete and is often not disclosed in a timely manner. In addition, the information is often not in English.

*Clearing and Settlement:* The settlement cycle is not fixed (from T+0 to T+10) and there are no overdraft facilities on the PFTS Stock Exchange. In addition, there is no nominee status and omnibus structures are not available.

*Custody:* There is no formal segregation between custody and trading accounts.

*Registry / Depository:* The central securities depository and the central registry remain inefficient.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* Off-exchange transactions are allowed but require approval from the authorities.

*Stability of Institutional Framework:* There have been instances of government interventions that challenged the stability of the “free-market” economy.

### 7.2.8 Zimbabwe

*Foreign Ownership Limits:* Listed companies are subject to a 40 percent foreign ownership limit.

*Equal Rights to Foreign Investors:* Rights of foreign investors are limited as a result of the stringent foreign ownership limits.

*Capital Flow Restriction Level:* Repatriation costs via the repatriation mechanism are relatively high and the process takes a long time.

*Foreign Exchange Market Liberalization Level:* The ease of convertibility of foreign exchange has been affected due to the illiquidity in the market.

*Market Regulations:* Not all regulations are publicly available.

*Information Flow:* There is a lack of robustness in, and enforcement of, local accounting standards. In addition, stock market information is often not complete.

*Clearing and Settlement:* In March 2017, the settlement cycle moved from T+5 to T+2 using a new DVP system. However, more time is needed to assess the efficiency of the process.

*Custody:* There are only two active custodians.

*Registry / Depository:* There is neither a central depository nor a central registry.

*Trading:* There is a very limited level of competition among brokers which can lead to high trading costs.

*Transferability:* In-kind transfers and off-exchange transactions are prohibited.

*Stability of Institutional Framework:* There is a lack of enforcement of the rule of law.

## 8 Appendices

### 8.1 Appendix I: MSCI Market Classification Framework

The classification of markets is a key input in the process of index construction as it drives the composition of the investment opportunity sets to be represented. The approach used by MSCI aims to reflect the views and practices of the international investment community by striking a balance between a country’s economic development and the accessibility of its market while preserving index stability.

The MSCI Market Classification Framework consists of following three criteria: economic development, size and liquidity as well as market accessibility.

In order to be classified in a given investment universe, a country must meet the requirements of all three criteria as described in the table below.

Criteria	Frontier	Emerging	Developed
<b>A Economic Development</b>  A.1 Sustainability of economic development	No requirement	No requirement	Country GNI per capita 25% above the World Bank high income threshold* for 3 consecutive years
<b>B Size and Liquidity Requirements</b> B.1 Number of companies meeting the following Standard Index criteria Company size (full market cap)** Security size (float market cap)** Security liquidity	2 USD 776 mm USD 61 mm 2.5% ATVR	3 USD 1,551 mm USD 776 mm 15% ATVR	5 USD 3,102 mm USD 1,551 mm 20% ATVR
<b>C Market Accessibility Criteria</b> C.1 Openness to foreign ownership C.2 Ease of capital inflows / outflows C.3 Efficiency of operational framework C.4 Availability of Investment Instrument C.5 Stability of the institutional framework	At least some At least partial Modest High Modest	Significant Significant Good and tested High Modest	Very high Very high Very high Unrestricted Very high

\* High income threshold for 2018: GNI per capita of USD 12,056 (World Bank, Atlas method)  
 \*\* Minimum in use for the May 2018 Semi-Annual Index Review, updated on a semi-annual basis

The economic development criterion is only used in determining the classification of Developed Markets while that distinction is not relevant between Emerging and Frontier Markets given the very wide variety of development levels within each of these two universes.

The size and liquidity requirements are based on the minimum investability requirements for the MSCI Global Standard Indexes.

Market accessibility aims to reflect international institutional investors' experience of investing in a given market and as a result, this criterion includes several sub-criteria. These criteria are generally based on qualitative measures that are reviewed for all markets at least once a year during the MSCI Global Market Accessibility Review.

MSCI regularly reviews the market classification of all countries included in the MSCI Indexes to ensure that they remain reflective of the evolution of the different markets. In particular, changes in the assessments under the classification framework serve as the basis for determining the markets that will be reviewed for potential market reclassification as part of the Annual Market Classification Review.

MSCI will only consider markets for upgrade if a change in classification status can be viewed as irreversible. Every June, MSCI will communicate its conclusions from the discussions with the investment community on the list of countries under review and announce the new list of countries, if any, under review for potential market reclassification in the upcoming cycle. While adhering to the regular time line for such communication helps provide greater predictability and is less disruptive to a market's normal functioning, MSCI may from time to time exercise prudent discretion and consider off-cycle communications should significant market events take place outside the regular review cycle.

## 8.2 Appendix II: Assessment Results

### 8.2.1 Developed Markets

	Americas		EMEA									
	Canada	USA	Austria	Belgium	Denmark	Finland	France	Germany	Ireland	Israel	Italy	Netherlands
Openness to foreign ownership												
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	++	++
Foreign ownership limit (FOL) level	+	++	++	++	++	++	++	++	+	++	++	++
Foreign room level	+	++	++	++	++	++	++	++	-/?	++	++	++
Equal rights to foreign investors	++	++	++	++	++	++	++	++	++	++	++	++
Ease of capital inflows / outflows												
Capital flow restriction level	++	++	++	++	++	++	++	++	++	++	++	++
Foreign exchange market liberalization level	++	++	++	++	++	++	++	++	++	++	++	++
Efficiency of the operational framework												
Market entry												
Investor registration & account set up	++	++	++	++	++	++	++	++	++	++	++	++
Market organization												
Market regulations	++	++	++	++	++	++	++	++	++	++	++	++
Information flow	++	++	++	++	++	++	++	++	++	+	++	++
Market infrastructure												
Clearing and Settlement	++	++	++	++	++	++	++	++	++	+	++	++
Custody	++	++	++	++	++	++	++	++	++	++	++	++
Registry / Depository	++	++	++	++	++	++	++	++	++	++	++	++
Trading	++	++	++	++	++	++	++	++	++	++	++	++
Transferability	++	++	++	++	++	++	++	++	++	++	++	++
Stock lending	++	++	++	++	++	++	++	++	++	++	++	++
Short selling	++	++	++	++	++	++	++	++	++	++	++	++
Availability of Investment Instrument	++	++	++	++	++	++	++	++	++	++	++	++
Stability of institutional framework	++	++	++	++	++	++	++	++	++	++	++	++

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

## 8.2.2 Developed Markets

	EMEA						Asia Pacific				
	Norway	Portugal	Spain	Sweden	Switzerland	United Kingdom	Australia	Hong Kong	Japan	New Zealand	Singapore
Openness to foreign ownership											
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	++
Foreign ownership limit (FOL) level	++	++	++	++	++	++	++	++	++	++	++
Foreign room level	++	++	-/?	++	++	++	++	++	++	++	++
Equal rights to foreign investors	++	++	++	++	++	++	++	++	+	++	++
Ease of capital inflows / outflows											
Capital flow restriction level	++	++	++	++	++	++	++	++	++	++	++
Foreign exchange market liberalization level	++	++	++	++	++	++	++	++	++	++	++
Efficiency of the operational framework											
Market entry											
Investor registration & account set up	++	++	++	++	++	++	++	++	++	++	++
Market organization											
Market regulations	++	++	++	++	++	++	++	++	++	++	++
Information flow	++	++	++	++	++	++	++	++	+	++	++
Market infrastructure											
Clearing and Settlement	++	++	++	++	++	++	++	++	++	++	++
Custody	++	++	++	++	++	++	++	++	++	++	++
Registry / Depository	++	++	++	++	++	++	++	++	++	++	++
Trading	++	++	++	++	++	++	++	++	++	++	++
Transferability	++	++	++	++	++	++	++	++	++	++	++
Stock lending	++	+	++	++	++	++	++	++	++	++	++
Short selling	++	+	+	++	++	++	++	++	++	++	++
Availability of Investment Instrument	++	++	++	++	++	++	++	++	++	++	++
Stability of institutional framework	++	++	++	++	++	++	++	++	++	++	++

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

### 8.2.3 Emerging Markets

	Americas						EMEA						
	Argentina	Brazil	Chile	Colombia	Mexico	Peru	Czech Republic	Egypt	Greece	Hungary	Poland	Qatar	Russia
Openness to foreign ownership													
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	++	++	++
Foreign ownership limit (FOL) level	++	+	++	++	-/?	++	++	+	++	++	++	-/?	++
Foreign room level	++	++	++	++	++	++	++	++	++	++	++	++	++
Equal rights to foreign investors	+	-/?	+	+	-/?	+	+	+	++	+	+	+	+
Ease of capital inflows / outflows													
Capital flow restriction level	++	++	+	+	++	++	++	+	++	++	++	++	++
Foreign exchange market liberalization level	+	-/?	+	-/?	++	++	++	-/?	++	++	++	++	+
Efficiency of the operational framework													
Market entry													
Investor registration & account set up	+	-/?	-/?	-/?	+	+	+	+	++	++	++	+	-/?
Market organization													
Market regulations	+	+	+	+	++	+	+	+	++	+	+	++	+
Information flow	+	+	+	+	+	+	+	+	++	+	+	++	-/?
Market infrastructure													
Clearing and Settlement	-/?	-/?	++	+	++	-/?	+	+	+	++	+	+	-/?
Custody	++	++	++	+	++	++	++	++	++	++	++	+	++
Registry / Depository	++	++	++	++	++	++	++	++	++	+	+	++	+
Trading	+	++	++	+	++	+	++	+	++	++	++	++	+
Transferability	+	+	-/?	-/?	++	+	++	-/?	-/?	++	+	-/?	++
Stock lending	-/?	++	-/?	+	++	-/?	+	-/?	-/?	+	+	+	-/?
Short selling	-/?	++	-/?	+	+	-/?	+	-/?	-/?	+	+	-/?	-/?
Availability of Investment Instrument	-/?	-/?	++	++	++	++	++	++	++	++	++	++	++
Stability of institutional framework	-/?	+	++	-/?	+	+	++	-/?	++	++	++	+	-/?

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

## 8.2.4 Emerging Markets

	EMEA				Asia Pacific									
	Saudi Arabia	South Africa	Turkey	United Arab Emirates	China	China A	India	Indonesia	Korea	Malaysia	Pakistan	Philippines	Taiwan	Thailand
Openness to foreign ownership														
Investor qualification requirement	+	++	++	++	++	-/?	+	++	++	++	++	++	+	++
Foreign ownership limit (FOL) level	-/?	++	++	-/?	-/?	-/?	-/?	++	+	+	++	-/?	+	-/?
Foreign room level	-/?	++	++	-/?	++	-/?	-/?	++	-/?	++	++	-/?	++	-/?
Equal rights to foreign investors	-/?	++	+	+	+	+	+	+	+	+	++	+	+	-/?
Ease of capital inflows / outflows														
Capital flow restriction level	++	++	++	++	++	-/?	++	++	++	++	++	++	++	++
Foreign exchange market liberalization level	++	++	+	++	++	+	-/?	-/?	-/?	+	+	-/?	-/?	+
Efficiency of the operational framework														
Market entry														
Investor registration & account set up	+	++	+	+	++	+	-/?	++	-/?	++	+	++	-/?	++
Market organization														
Market regulations	++	++	+	++	+	+	+	++	++	++	+	++	++	++
Information flow	+	++	+	++	++	+	++	+	-/?	++	++	++	+	++
Market infrastructure														
Clearing and Settlement	+	+	+	+	++	-/?	-/?	+	-/?	++	+	+	-/?	+
Custody	+	++	++	+	++	++	++	++	++	++	++	++	++	++
Registry / Depository	++	++	++	++	++	++	++	++	++	++	++	++	++	++
Trading	++	++	++	++	++	++	++	++	++	++	++	++	++	++
Transferability	-/?	+	++	+	++	-/?	-/?	+	-/?	+	++	++	+	++
Stock lending	-/?	++	++	-/?	++	-/?	++	+	++	++	-/?	-/?	+	+
Short selling	-/?	++	+	-/?	++	-/?	+	+	++	+	-/?	-/?	+	+
Availability of Investment Instrument	++	++	-/?	++	++	-/?	-/?	++	-/?	++		++	++	++
Stability of institutional framework	+	+	-/?	+	+	+	+	+	+	+	-/?	+	+	+

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed



## 8.2.5 Frontier Markets

	EMEA											
	Bahrain	Benin	Burkina Faso	Croatia	Estonia	Ivory Coast	Jordan	Kazakhstan	Kenya	Kuwait	Lebanon	Lithuania
Openness to foreign ownership												
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	+	++
Foreign ownership limit (FOL) level	++	++	++	++	++	++	++	++	++	++	++	++
Foreign room level	++	++	++	++	++	++	++	++	++	++	++	++
Equal rights to foreign investors	++	+	+	++	++	+	+	++	++	+	+	++
Ease of capital inflows / outflows												
Capital flow restriction level	++	++	++	++	++	++	++	++	+	++	++	++
Foreign exchange market liberalization level	++	+	+	++	++	+	++	-/?	-/?	++	-/?	++
Efficiency of the operational framework												
Market entry												
Investor registration & account set up	+	+	+	-/?	++	+	++	+	+	+	-/?	++
Market organization												
Market regulations	++	+	+	++	++	+	++	++	++	++	+	++
Information flow	-/?	-/?	-/?	++	++	-/?	+	+	++	-/?	+	++
Market infrastructure												
Clearing and Settlement	+	+	+	-/?	++	+	+	-/?	-/?	+	-/?	++
Custody	+	++	++	++	++	++	++	++	++	+	-/?	++
Registry / Depository	+	++	++	++	++	++	++	++	+	++	-/?	++
Trading	++	-/?	-/?	+	++	-/?	+	+	-/?	++	++	++
Transferability	-/?	-/?	-/?	++	++	-/?	-/?	+	-/?	-/?	-/?	++
Stock lending	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Short selling	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Availability of Investment Instrument	++				++		++	++		++		++
Stability of institutional framework	+	+	+	+	+	-/?	+	-/?	+	+	-/?	+

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

Availability of Investment Instrument for some Frontier and Standalone Market countries is still being assessed.

## 8.2.6 Frontier Markets

	Mauritius	Morocco	Nigeria	Oman	EMEA Romania	Senegal	Serbia	Slovenia	Tunisia	Bangladesh	Asia Pacific Sri Lanka	Vietnam
Openness to foreign ownership												
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	+	++
Foreign ownership limit (FOL) level	++	++	++	-/?	++	++	++	++	++	++	++	-/?
Foreign room level	++	++	++	++	++	++	++	++	++	++	++	-/?
Equal rights to foreign investors	++	+	+	+	+	+	+	++	+	++	++	-/?
Ease of capital inflows / outflows												
Capital flow restriction level	++	+	-/?	++	++	++	+	++	++	+	++	++
Foreign exchange market liberalization level	-/?	+	-/?	++	++	+	+	++	+	-/?	-/?	-/?
Efficiency of the operational framework												
Market entry												
Investor registration & account set up	++	++	++	+	++	+	-/?	++	++	-/?	-/?	+
Market organization												
Market regulations	++	+	+	++	++	+	+	++	+	+	++	+
Information flow	++	+	-/?	+	++	-/?	+	++	-/?	++	++	-/?
Market infrastructure												
Clearing and Settlement	+	-/?	++	+	+	+	+	++	-/?	-/?	-/?	-/?
Custody	++	++	++	-/?	++	++	++	++	-/?	+	++	++
Registry / Depository	++	++	+	++	++	++	++	++	++	++	++	++
Trading	-/?	+	-/?	++	++	-/?	+	+	-/?	-/?	-/?	++
Transferability	-/?	-/?	-/?	-/?	+	-/?	+	++	-/?	+	-/?	-/?
Stock lending	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Short selling	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Availability of Investment Instrument		++		++	++			++				
Stability of institutional framework	+	+	-/?	+	+	+	+	+	-/?	-/?	+	+

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

Availability of Investment Instrument for some Frontier and Standalone Market countries is still being assessed.

## 8.2.7 Standalone Markets

	Americas			EMEA								
	Jamaica	Panama	Trinidad & Tobago	Bosnia and Herzegovina	Botswana	Bulgaria	Ghana	Iceland	Malta	Palestine	Ukraine	Zimbabwe
Openness to foreign ownership												
Investor qualification requirement	++	++	++	++	++	++	++	++	++	++	++	++
Foreign ownership limit (FOL) level	++	++	++	++	++	++	++	++	++	++	++	-/?
Foreign room level	++	++	++	++	++	++	++	++	++	++	++	++
Equal rights to foreign investors	++	+	++	++	++	++	++	++	++	+	+	+
Ease of capital inflows / outflows												
Capital flow restriction level	++	++	++	++	++	++	++	-/?	++	++	-/?	-/?
Foreign exchange market liberalization level	++	++	-/?	+	+	+	+	-/?	++	-/?	-/?	-/?
Efficiency of the operational framework												
Market entry												
Investor registration & account set up	++	-/?	-/?	++	++	+	-/?	+	++	+	-/?	++
Market organization												
Market regulations	+	+	+	+	-/?	++	++	++	++	++	-/?	-/?
Information flow	++	-/?	+	-/?	+	+	+	++	++	+	-/?	-/?
Market infrastructure												
Clearing and Settlement	-/?	+	-/?	-/?	-/?	++	+	++	++	-/?	-/?	-/?
Custody	-/?	-/?	-/?	++	++	-/?	+	++	++	-/?	-/?	+
Registry / Depository	+	-/?	+	++	+	++	++	++	++	++	+	-/?
Trading	-/?	+	-/?	-/?	-/?	++	-/?	++	++	+	-/?	-/?
Transferability	+	-/?	-/?	-/?	-/?	++	-/?	++	++	-/?	+	-/?
Stock lending	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Short selling	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?	-/?
Availability of Investment Instrument			++			++						
Stability of institutional framework	+	+	+	+	+	+	+	++	++	-/?	-/?	-/?

++: no issues; +: no major issues, improvements possible; -/? : improvements needed / extent to be assessed

Availability of Investment Instrument for some Frontier and Standalone Market countries is still being assessed.

## 8.3 Appendix III: Market Accessibility Measures

	<b>Definition</b>
<b>Openness to foreign ownership</b>	
Investor qualification requirement	Existence of qualifying conditions for international investors. Existence of a level playing field for all international investors.
Foreign ownership limit (FOL) level	Proportion of the market being accessible to non-domestic investors.
Foreign room level	Proportion of shares still available for non-domestic investors. Existence of a foreign board where non-domestic investors could trade with
Equal rights to foreign investors	Equal economic and voting rights as well as availability of information in English. Equal rights for minority shareholders.
<b>Ease of capital inflows / outflows</b>	
Capital flow restriction level	Existence of restriction on inflows and outflows of foreign capital to/from the local stock market (excluding foreign currency exchange restrictions).
Foreign exchange market liberalization level	Existence of a developed onshore and offshore foreign exchange market.
<b>Efficiency of the operational framework</b>	
<b>Market entry</b>	
Investor registration & account set up	Existence/level of complexity of registration requirements for international investors such as Tax IDs as well as ease/complexity for setting up local accounts (e.g., documents to be provided, approvals required). The time to complete the process includes the preparation of the documents.
<b>Market organization</b>	
Market regulations	Level of advancement of the legal and regulatory framework governing the financial market, the stock exchange and the various other entities involved in the financial markets, an important weight is assigned to: ease of access (including in English), lack of ambiguity and
Information flow	Timely disclosure of complete stock market information items (e.g., stock exchange alerts, corporate news, float information, dividend information) in English and under reasonable commercial terms.
<b>Market infrastructure</b>	
Clearing and Settlement	Well functioning clearing and settlement system based on the broad framework published by the Bank for International Settlements including Delivery Versus Payment (DVP), the absence of pre-funding requirements/practices and the possibility to use overdrafts. Availability of real
Custody	Level of competition amongst local custodian banks as well as the presence of global custodian banks. Existence of an efficient mechanism that prevents brokers to have unlimited access to the investor's accounts and guarantees the safekeeping of its assets.
Registry / Depository	Well functioning central registry or independent registrars and a central depository.
Trading	Level of competition amongst brokers ensuring high quality services (e.g., cost efficient trading, ability to execute grouped trades at the same price for the various accounts of a fund manager).
Transferability	Possibility of off-exchange transactions and "in-kind" transfers.
Stock lending	Existence of a regulatory framework as well as an efficient mechanism allowing extensive use of stock lending.
Short selling	Existence of a regulatory and practical framework allowing short selling.
<b>Availability of Investment Instruments</b>	Existence of restrictions on access to derived stock exchange information, data and products that prevents the creation of investment
<b>Stability of institutional framework</b>	Basic institutional principles such as the rule of law and its enforcement as well as the stability of the "free-market" economic system. Track record of government intervention with regards to foreign investors.

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