

**A SHRINKING WORLD:
GLOBAL CITIZENSHIP FOR UHNW
INDIVIDUALS**

SPECIAL REPORT

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EXECUTIVE SUMMARY

The trend of ultra high net worth (UHNW) individuals applying for a second residence and/or citizenship seems to have recently gained more prominence with high profile examples such as Bernard Arnault contemplating switching to Belgian citizenship, Gerard Depardieu moving from France to Russia in early 2013, and Tina Turner giving up her US citizenship in November 2013 to become Swiss.

Wealth-X, the world's leading UHNW prospecting and intelligence firm, in collaboration with Arton Capital, the global citizenship experts, have partnered to dig deeper into this trend and compare various HNW investment immigration programs, examine why UHNW individuals choose to switch citizenships, and look into what is in store for future global citizens. This is a hugely promising area of growth that we are only at the very beginning of, and as wealth creation continues to develop rapidly, so too will global citizenship.



Mykolos D. Rambus
Chief Executive Officer
Wealth-X



David S. Friedman
President
Wealth-X



Armand Arton
President & CEO
Arton Capital

INTRODUCTION



Global citizenship is becoming an increasingly popular tool for the world's ultra wealthy. There are many different reasons why an ultra high net worth (UHNW) individual might seek a second citizenship including greater stability and security, tax efficiency, ease of travel, higher standard of living, increased options for children's education, and investment opportunities that may not otherwise be available - to name but a few. There are also further considerations to be made about Immigrant Investor Programs (IIPs), and Citizenship by Investment Programs (CIPs); the former requires a residence permit as a precondition to citizenship, whilst the latter offers citizenship directly.

This study analyses the world's UHNW individuals - defined as those with a net worth of US\$30 million and above - and the potential benefits that HNW programs for second residence or citizenship offer for the ultra wealthy.

We will provide an overview of the global UHNW market, and then look in more depth at the profiles of the ultra wealthy that have either begun or completed applications for a second citizenship. We will also examine the potential for many future global citizens to come from the two giants of Asia, India and China, and their existing non-resident populations. Analysing the high return on investment that the high net worth programs for alternative residence and citizenship offer, we expect the number of the ultra wealthy seeking second citizenship to increase at an even faster rate in the next 10 years.

OVERVIEW OF HNW PROGRAMS FOR ALTERNATIVE RESIDENCE AND CITIZENSHIP ACROSS THE WORLD

Below is an overview of some of the most popular programs available for ultra wealthy citizens, including a brief summary of their investment requirements.

There are many factors that need to be considered before applying for a second citizenship, not merely investment requirements. Other factors include the time to citizenship, the number of countries that can be visited without a visa, physical residency requirements, and of course the country itself.

There are two main types of programs that are provided for in the national legislations of almost any jurisdiction:

- Hybrid programs where (permanent) residence is obtained on the grounds of investment in a pre defined list of assets which may vary from government bonds, through active investments in business or government-approved projects, to investment in real estate and direct donation to state projects;

- Economic citizenship programs where citizenship is obtained directly. The precondition is again for the foreign individual to have invested certain amount in the pre-defined list of assets and/or projects.

Such legislative mechanisms provide for the inclusion of family members, such as the spouse, underage and – in certain jurisdictions – dependent children above the age of 18, as well as dependent parents.

In the past decade, certain jurisdictions have become more popular destinations among HNW individuals who are looking for a better future for themselves and their families. Application and investment requirements vary from one jurisdiction to another, and so do the timelines for approval of applications and the prerequisites to maintain the residence/ citizenship status, once obtained.

The specially designed ArtonINDEX enables us to compare jurisdictions by examining them based on five main dimensions:

Overall cost	Speed	Global mobility	Quality of life	Simplicity
Including application fees and investment	The amount of time it takes to obtain citizenship	The number of countries that the passport holder can go to visa-free or with a visa upon arrival	In the hosting country	Represented by the existence of a waiver to different requirements, such as knowledge of the local language, requirement to be physically present for a certain amount of time, and other requirements

The ArtonINDEX gives a maximum score of 100 and includes the 10 most sought-after countries that currently offer options to obtain second residence and/or citizenship against investment. The following countries in the selection below are not covered by the index: Greece, Spain, and Australia.

Fact File of Select Countries

EUROPE

Bulgaria

Requirements: Proof of a minimum net worth of €1 million (US\$1.4 million) and investment of €511,292 (US\$700,000) in a Government Bonds portfolio for five years
Arton Index Score: 66

Cyprus

Requirements: Purchase of a property worth at least €500,000 (US\$700,000) and one of the following investment options:

- Donate €500,000 (US\$700,000) to the Research and Technology fund and deposit €2 million (US\$2.8 million) for the purchase of bonds/shares of the State Investment Company

- Directly invest at least €5 million (US\$7 million) in property, financial assets, or business/companies

- Deposit at least €5 million (US\$7 million) in a Cypriot bank for three years

Arton Index Score: 70

Greece

Requirements: Purchase of a property for at least €250,000 (US\$350,000)

Arton Index Score: N/A

Hungary

Requirements: Purchase Government approved zero-coupon bonds for €250,000 (US\$350,000) and receive the principal back five years later

Arton Index Score: 64

Spain

Requirements: Deposit €1 million (US\$1.4 million) in a Spanish bank, invest €1 million (US\$1.4 million) in a Spanish company, invest at least €500,000 (US\$700,000) in property, or acquire Spanish public debt of at least €1 million (US\$1.4 million)

Arton Index Score: N/A

United Kingdom

Requirements: At least £1 million (US\$1.6 million) intended to be invested in the UK (or a £2 million (US\$3.2 million) net worth with £1 million (US\$1.6 million) in loans from an accredited financial institution to be invested in the UK)

Arton Index Score: 56

LATIN AMERICA & THE CARIBBEAN

Antigua & Barbuda

Requirements: Make a donation of at least US\$250,000 (for single applicant) to an approved charity, or invest at least US\$400,000 in a government-approved real estate project, or invest US\$1.5 million to establish a business.

Arton Index Score: 59

Dominica

Requirements: Donate US\$100,000 – US\$500,000 (depending on the number of the qualifying family members) or invest US\$200,000 in a government-approved real estate project.

Arton Index Score: 51

Grenada

Requirements: Purchase an approved property for at least US\$1 million (or 25% of a property for at least US\$250,000).

Arton Index Score: 61

St. Kitts & Nevis

Requirements: Invest at least US\$400,000 in a government-approved real estate project, or contribute US\$250,000 (for a single applicant) to the Sugar Industry Diversification Foundation.

Arton Index Score: 65

NORTH AMERICA

United States

Requirements: Investment in enterprises that create 10 full time jobs for US workers within two years, or invest at least US\$1 million in a commercial enterprise (US\$500,000 in targeted areas)

Arton Index Score: 48

ASIA PACIFIC

Australia

Requirements: Investment of at least A\$5 million (US\$4.7 million), excluding property

Arton Index Score: N/A



Mixed Signals

Whilst there have been many countries offering investment immigration targeted at wealthy individuals in recent years, there have also been some countries withdrawing some of these investor programs. For example, Canada recently cancelled their immigrant investor program whilst Singapore has made it more difficult for wealthy foreigners to gain citizenship to the city-state, scrapping their Financial Investor Scheme in 2012.

Despite this, the last few years have seen more and more programs being offered by various countries, often targeting individuals from specific regions. For example, Australia's Significant Investor Visa has seen the most demand from Chinese individuals, whilst many Russians have used the investor programs offered by Cyprus.

Immigrant Investor Programs (IIPs) vs. Citizenship by Investment Programs (CIPs)

IIPs require a residence permit as a precondition to citizenship, whilst CIPs allow citizenship to be obtained directly. Of the countries tracked by the ArtonINDEX, all of the Caribbean HNW programs offer citizenship in under a year, as well as Cyprus (3 months) and Bulgaria also offers a fast track to citizenship, albeit one that still takes two years. Hungary, the UK and USA can take between 5.5 and 8 years to obtain citizenship. For UHNW individuals leaving countries experiencing social unrest, the priority of the fast citizenship of CIPs will increase, and could well be the determining factor. However, this distinction between IIPs and CIPs should only be one of many factors to consider when weighing up HNW programs for alternative residence and citizenship across the world.

Affordability of Programs

As a pure investment, some of these programs are very attractive to UHNW individuals. For example, the cost of purchasing bonds worth €250,000 (US\$350,000) in Hungary gives access to visit all of the Schengen Area visa-free (with all of the European Union possible after citizenship, requiring 8 years of holding of permanent residency). After five years, this original capital is returned, so the UHNW individual has lost out on 5 years of interest, equivalent to approximately €116,000* (US\$160,000). Whilst this may sound like a significant sum, this is 0.1% of the average UHNW individuals' net worth, and will save considerable time and stress. Even as a percentage of their liquid assets, it is only 0.5% of the average US\$35 million held in cash, a small expense when considering the increase in the quality of life they will enjoy. If leaving a country with higher taxes, the savings alone will pay for some of these investor programs in a matter of months.

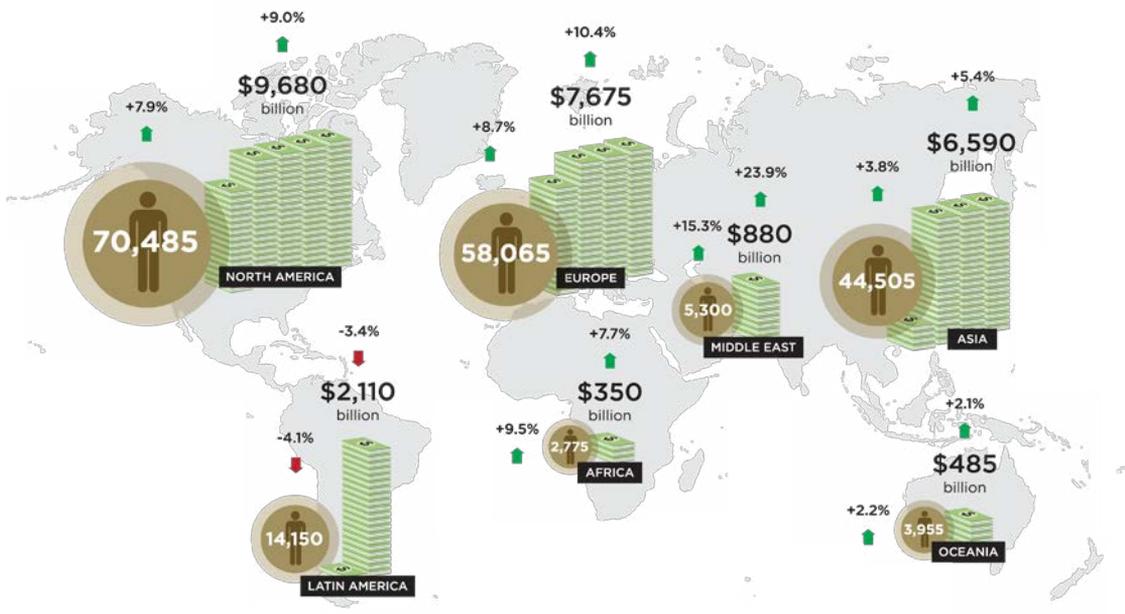
*Assumes a 10% average growth rate over 5 years, equal to €116,000 (US\$160,000)

THE GLOBAL UHNW MARKET

The global UHNW population is currently at record highs, with nearly 200,000 individuals collectively worth US\$28 trillion.

UHNW Individuals by Region

2013 UHNW POPULATION	2013 TOTAL WEALTH US\$ BILLION	2012 UHNW POPULATION	2012 TOTAL WEALTH US\$ BILLION	POPULATION CHANGE %	TOTAL WEALTH CHANGE %
199,235	27,770	187,380	25,775	+6.3%	+7.7%



Source: Wealth-X and UBS World Ultra Wealth Report 2013

With nearly 90% of UHNW individuals married, and an average of two children, the addressable market is four times larger at 800,000 people, and the importance of family considerations for global citizenship cannot be overstated. Often in families with UHNW individuals, the spouse may be the key decision maker at home, or the needs of the children may be prioritised. This means that it is not only the UHNW individual themselves who need to see the benefit of immigrant investor programs, but the other

family members as well. Moving half way across the world is a huge decision to make, regardless of wealth, and this is why factors beyond just the investment requirements are important when comparing programs. The likes of safety, security, quality of life and ease of travel may be more important to the other family members than they are to the UHNW individual themselves, and is why the entire family needs to be considered.

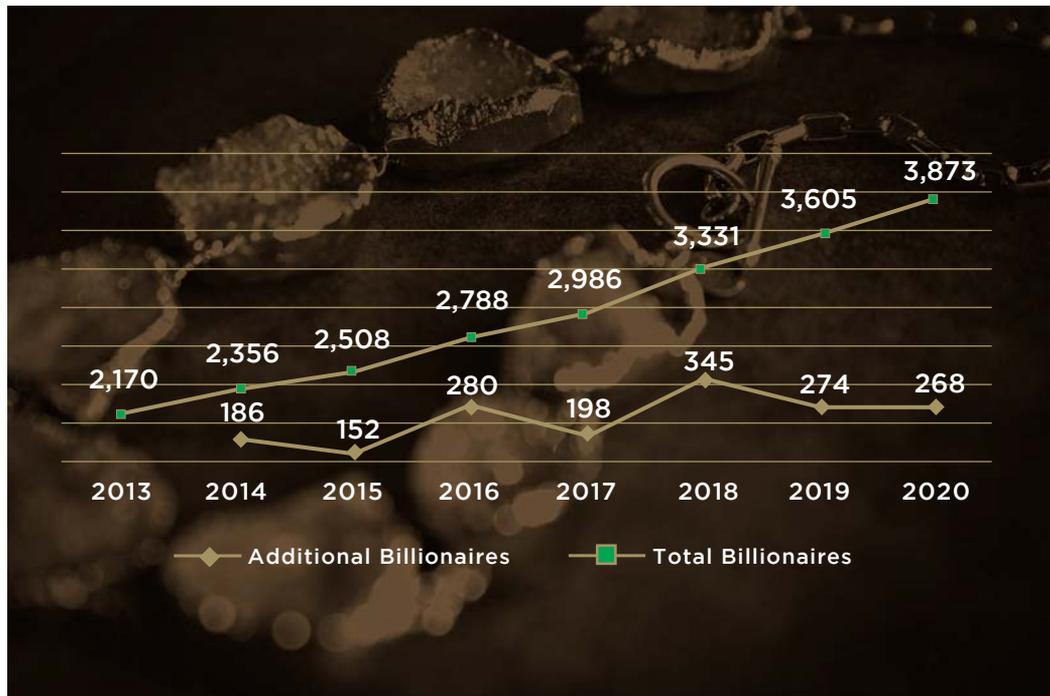
UHNW Individuals by Wealth Tier

WORLD UHNW	2013		2012			
NET WORTH	UHNW POPULATION	TOTAL WEALTH US\$ billion	UHNW POPULATION	TOTAL WEALTH US\$ billion	POPULATION CHANGE %	TOTAL WEALTH CHANGE %
\$1 billion +	2,170	6,516	2,160	6,190	0.5%	5.3%
\$750 million to \$999 million	1,080	929	990	855	9.1%	8.7%
\$500 million to \$749 million	2,660	1,695	2,475	1,560	7.5%	8.7%
\$250 million to \$499 million	8,695	3,420	8,090	3,225	7.5%	6.0%
\$200 million to \$249 million	14,185	3,205	13,500	3,035	5.1%	5.6%
\$100 million to \$199 million	23,835	3,780	22,290	3,335	6.9%	13.3%
\$50 million to \$99 million	60,760	4,720	56,205	4,295	8.1%	9.9%
\$30 million to \$49 million	85,850	3,505	81,670	3,280	5.1%	6.9%
TOTAL	199,235	27,770	187,380	25,775	6.3%	7.7%

Source: Wealth-X and UBS World Ultra Wealth Report 2013

When the world's UHNW population is broken down according to wealth tiers, it is clear there are great wealth disparities, even within the 0.003%. Billionaires account for 1% of the world's UHNW individuals but hold 23% of the wealth, worth US\$6.5 trillion.

Forecast of Future Billionaires, 2013-2020



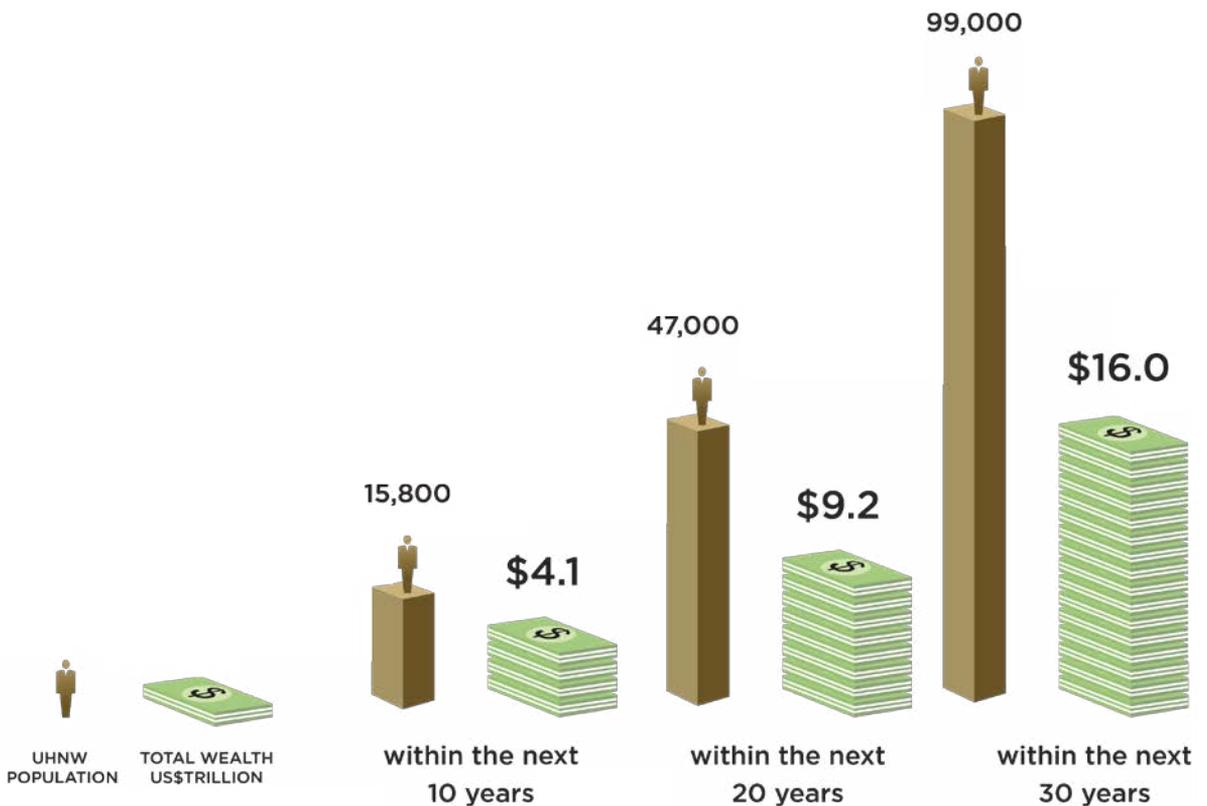
Source: Wealth-X and UBS Billionaire Census 2013

These are the individuals who stand to gain the most from global citizenship, and it is predicted that the billionaire population is going to grow nearly 80% by the year 2020, an increase of 1,700 billionaires.

Billionaires typically lead the most global lifestyles, their time is by definition more valuable than anyone else's, and consequently being able to travel visa-free on their private jet could be an invaluable investment for what is a small percentage of their net worth. For example, the average billionaire owns four properties worth US\$78 million combined, with most of these being outside his primary country of residence. 5% of UHNW individuals who have applied for second citizenships have a net worth of at least a billion dollars – meaning that billionaires (who make up 1% of the world's UHNW population) are five times more likely to apply for an immigrant investor program.

Another subset of the world's UHNW population who stand to gain from immigrant investor programs are self-made individuals, who account for 65% of the world's UHNW population. This is because many lack the sophisticated financial advisors, accountants, lawyers, wealth managers, and bankers that “old-money” families have relied on for generations, and so are the most vulnerable to large costs, especially during a potential wealth transfer to the next generation. For example, without proper planning some UHNW individuals may have to pay large inheritance taxes that could immediately deny their heirs half of their fortune. Although seeking second citizenship is a process that should ideally be started years in advance of any potential wealth transfer, it is a viable option for self-made UHNW individuals who wish to benefit from more competitive tax schemes.

Global UHNW Wealth Transfers Expected, US\$ trillion



Source: Wealth-X Institute

The expected wealth transfer in the coming years from UHNW individuals is going to be the largest ever, and could be one of the main reasons why UHNW individuals decide to change their citizenship. There is large variance in the inheritance tax legislation across countries, and the potential savings could be significant.

The total wealth being transferred to the next generation in the next 30 years is expected to exceed

US\$16 trillion, in 2013 dollars – larger than the GDP of the United States. The countries expected to transfer the most wealth as a share of their current wealth include France, Hong Kong and Italy. Countries that have had a more recent phase of wealth creation will play a less significant role in this generational wealth transfer. China's UHNW population, for example, is nearly a decade younger than the global average.

TRENDS IN GLOBAL CITIZENSHIPS OF UHNW INDIVIDUALS



Slightly less than 60% of all UHNW second citizenship applicants come from countries in the Middle East. One possible explanation for this is that the Middle East has a high proportion of its UHNW wealth belonging to billionaires (40%), more than any other region in the world. As mentioned earlier in the paper, billionaires are five times more likely to apply for a second citizenship, as they have more to gain from obtaining one and the costs of obtaining it are also lower, as a proportion of their wealth. As Middle Eastern wealth is skewed towards the top tiers and the attractiveness of a second citizenship increases with wealth, it would help explain why the region is overrepresented.

When examining this situation on a country level, it becomes clear that the UHNW individuals wishing to move or change their citizenship most commonly come from those countries that do not have high stability of asset security. Lebanon, Syria and Egypt, for example, have all experienced unrest in the last few years so it is logical for those who have the means to wish to move somewhere with greater stability.

The exception to this is the United States, which is the fifth most significant country in terms of the number of UHNW individuals applying for other citizenships. There are three factors that would help explain this apparent anomaly:

- The United States has by far the largest UHNW population, so the share of American UHNW individuals wishing to move abroad is still small. For example, UHNW individuals from Syria are 300 times more likely to apply for a second citizenship than those from the US.
- There is greater transparency in the US, with a monthly list made public of those who have given up their citizenship. This makes it impossible for Americans to renounce their US citizenship “under the radar”.
- The global taxation system can make it very expensive for UHNW individuals to maintain their US citizenship, especially if they are living in a lower taxed jurisdiction such as Switzerland, Dubai or Singapore. The annual savings in capital gains tax alone for an average UHNW individual could reach almost US\$1 million*.

Russia is also an interesting country to find near the top of this list. Although recent developments in Crimea would have likely increased the number of applications made, the bulk of the data comes from before the current crisis. Much like the Middle East, billionaires in Russia have a disproportionate share of the country’s UHNW wealth, controlling 55% of the total. There are high profile examples of billionaires moving abroad, with London a preferred destination, most notably Roman Abramovich whose business is headquartered in the UK.

*Assumes an average UHNW individual receives 5% of his/her net worth in income a year, and 90% of this is subject to a capital gains tax rate of 15%.

The Most Significant Countries of Origin for UHNW Individuals who have a Second Citizenship

RANK	COUNTRY OF ORIGIN	PERCENTAGE
1	PAKISTAN	17%
2	LEBANON	15%
3	EGYPT	7%
4	SYRIA	7%
5	USA	7%
6	RUSSIA	6%

Region of Application

Europe is the most popular region in terms of second residence and citizenship applications, accounting for over half of the total number of applications, with the Caribbean in second place, ahead of North America. The European programs are popular thanks to free travel within the EU, allowing an “arbitrage” where UHNW individuals can gain citizenship with Bulgaria for example (which has top income tax rate of 10%), even if they spend a large part of their time in higher taxed countries such as France or Italy (both with a top income tax rate of 45%). The popularity of the Caribbean region is thanks to the lower barriers to entry offered by many Caribbean countries, such as Antigua and Dominica, where fast track programs are available, and physical residency requirements, where existent, are very low.

Whilst the aforementioned global taxation system may deter some from applying to the US, and would help explain its lower position, the US still accounts for 1 in 7 applications made. This shows that lifestyle factors are an important consideration for global citizens and the decision to seek a second citizenship is often about more than just taxes. For example, the US could be a popular destination for UHNW families with children preparing to go to university, where they would have better access to world-class institutions.

The Most Significant Regions of Citizenship Application

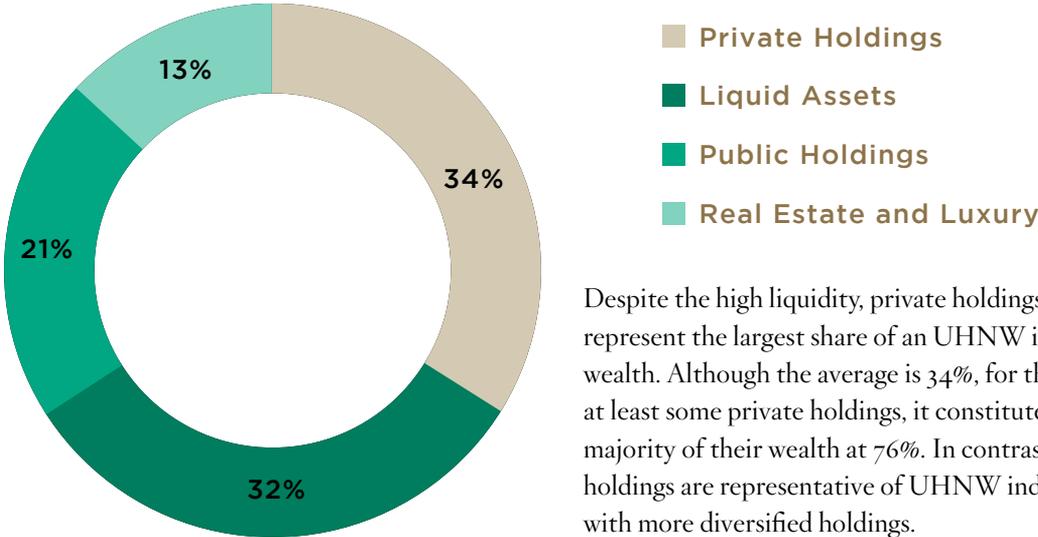
REGION	PERCENTAGE
EU	56%
CARIBBEAN	25%
NORTH AMERICA	14%
OTHERS	5%

The average net worth of someone who applies for a second citizenship is above US\$205 million, 47% above the global average for UHNW individuals of US\$139 million.

Likewise, they are also more liquid, with 32% of their net worth in liquid assets, equal to over US\$66 million per individual. In absolute terms, this is nearly double the global average of US\$35 million, and is also higher as a proportion of wealth, compared to the global average liquidity of 25%. This means that all requirements of immigrant investor programs can be met with purely liquid investments by an average UHNW individual.

UHNW individuals with a second citizenship have an average age of 57, just below the global average of 58 years. This average age includes two different clusters that both move for family reasons. One group moves to provide their children with increased education opportunities, and many of these individuals opt to relocate to the US and UK. The second cluster is elder UHNW individuals planning on transferring their wealth to the next generation, and who apply to more tax-friendly countries including the Caribbean countries of Antigua and Dominica.

Wealth Deconstruction for UHNW Individuals with Second Citizenship



Despite the high liquidity, private holdings still represent the largest share of an UHNW individual's wealth. Although the average is 34%, for those with at least some private holdings, it constitutes the majority of their wealth at 76%. In contrast, public holdings are representative of UHNW individuals with more diversified holdings.

ASIA'S GIANTS: THE POTENTIAL OF INDIA AND CHINA'S NON-RESIDENTS



Looking forward, Asia is expected to drive global growth, and be the largest UHNW region in the world within 20 years. With over half of the world's population, and a rapidly growing middle class, Wealth-X believes that Asia is still in the early stages of a 150-year cycle of wealth creation.

It is highly likely that we will see an increasing number of UHNW individuals from Asia's two giants, China and India, seeking global citizenship in the coming years. These countries both already have some of the largest populations based abroad, with 5,380 NRI's and 3,020 NRC's.

Coupled with current residents of China and India, the two countries have a total UHNW population of 26,925, accounting for 1 of every 7 UHNW individuals in the world.

Asia overall is expected to be one of the fastest growing regions in terms of number of UHNW individuals in the next five years, with the region's UHNW population increasing at an average rate of 5.9%. As two of the three largest UHNW countries in Asia, China and India are going to be among the key countries driving this strong growth. With each country already having large non-resident populations, the precedent of moving abroad has already been made, and so as those countries' UHNW populations grow, there is likely to be an increase in the non-resident population as well.

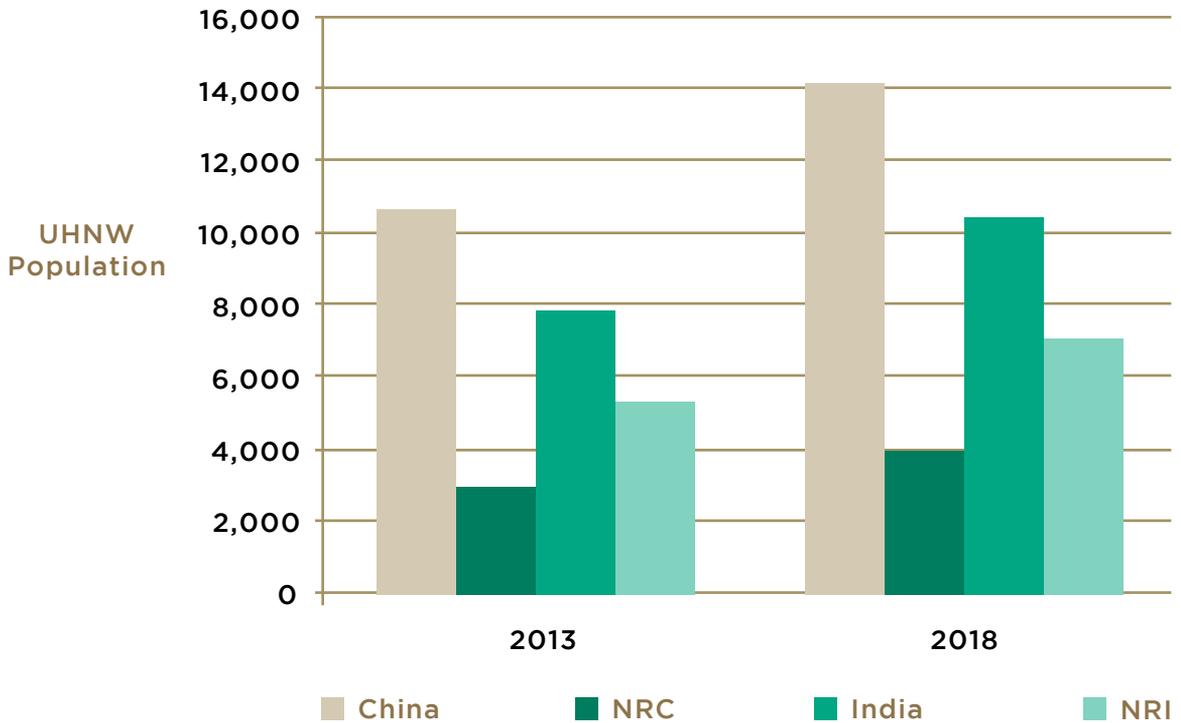
Comparison of China's and NRC UHNW Individuals

	CHINA'S UHNW INDIVIDUAL	NRC UHNW INDIVIDUAL
MEAN NET WORTH (US\$ MILLION)	142	166
LIQUIDITY (% OF NET WORTH)	12%	23%
AVERAGE AGE	52	68
TOTAL UHNW POPULATION SIZE	10,675	3,020

Comparison of India's and NRI UHNW Individuals

	INDIA'S UHNW INDIVIDUAL	NRI UHNW INDIVIDUAL
MEAN NET WORTH (US\$ MILLION)	119	148
LIQUIDITY (% OF NET WORTH)	24%	26%
AVERAGE AGE	55	58
TOTAL UHNW POPULATION SIZE	7,850	5,380

Projected Growth of UHNW Populations



Source: Wealth-X Institute

At the average population growth rate of 5.9% that is predicted for all of Asia, these four groups of UHNW individuals (NRC, NRI, China and India's UHNW individuals) would grow by 33% in the next five years. This equates to an additional 8,935 UHNW individuals, greater than the current UHNW population of Switzerland and Italy combined, being created in the next five years alone.

CONCLUSION



The trends that have been driving global citizenship – technology, globalization, and increasing convergence of the world’s wealthiest – look set to continue, making ease of travel more important than ever. Coupled with greater stability, increased quality of life in some of the world’s most desirable cities and competitive tax rates will make a second citizenship more and more appealing as the wealth of UHNW individuals increases.

Measured solely in investment terms, the majority of these investor immigration programs are very attractive to UHNW individuals,

costing as little as 0.5% of their liquid assets, or 0.1% of their net worth, and providing a host of positive benefits.

As education and awareness of global citizenship programs continues to increase, so too will the number of applications being made by UHNW individuals. With more and more wealth being created in Asia, yet demand for residence in European territories being so high, this trend of UHNW individuals seeking global citizenship will undoubtedly continue to grow.

ABOUT WEALTH-X

Wealth-X is the definitive source of intelligence on the ultra wealthy with the world's largest collection of curated research on ultra high net worth (UHNW) individuals, defined as those with net assets of US\$30 million and above.

Headquartered in Singapore, our firm has 13 offices in five continents. With our passion for prospecting with insight, diligence and strategy, we are the right way to grow for private bankers, professional fundraisers and luxury brands.

ABOUT ARTON CAPITAL

Arton Capital empowers individuals and families to become global citizens. We accomplish this through a high-end service and experience that simplifies complexity and which is supported and sustained by long-term relationships.

We also play a critical role in helping governments, consultants, legal and financial professionals and investors to meet their citizenship goals more quickly, efficiently and effectively.

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For more information, contact press@wealthx.com

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ARTON CAPITAL EMPOWERING GLOBAL CITIZENSHIP®

UNITED ARAB EMIRATES

Emirates Towers, Level 41, Sheikh Zayed Road, P.O.Box 31303, Dubai
T +9714 319 7665 F +9714 330 3365 M +97155 560 7029

CANADA

1, Westmount Square, Suite 1810, Montreal, Quebec, H3Z 2P9
Toll-Free (Us, Canada): 1 855 935 6665 T +1 514 935 6665 F +1 514 935 5622

BULGARIA

47, Moskovska Street, Floor 4, Sofia 1000
T +359 2 439 1464 F +359 2 439 1461

info@artoncapital.com | www.artoncapital.com



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