

February 18, 2020

## The political challenges of implementing environmental regulations

By Angelo Katsoras

### Introduction

A growing number of countries and companies are being prompted by mounting public pressure and institutional investors to adopt increasingly tighter environmental regulations.

The main challenge for these countries will be to implement environmental policies able to stem global warming in the long term without having an overly large impact on economic growth in the short term. This balancing act entails providing significant financial assistance to regions that will be adversely impacted at a time when many countries are already struggling with sluggish growth and overstretched budgets. Companies, especially in the energy sector, will face the double challenge of maintaining profitability and implementing robust environmental policies to preserve social acceptability.

Another looming risk is that differing views on climate policies will increase tensions between countries and spill over into trade policy.

### Major investors forcing companies to take climate change seriously

More and more institutional investors and financial institutions are placing environmental concerns at the forefront of their business plans. The most prominent example of this is the Climate Action 100+, a group of investors managing assets worth more than \$40 trillion. The group is leveraging its influence to pressure major corporations to curb emissions. Blackrock, which manages over \$7 trillion in assets, recently joined the Climate Action 100+ and announced that it would begin exiting investments in coal production, introduce funds that ban fossil-fuel stocks, and vote against corporate management lagging behind on efforts to fight climate change.

### The Energy sector is in the crosshairs

Owing to the high levels of greenhouse gases it emits, the fossil-fuel energy sector has come under particular scrutiny. From 2011 to December 2019, the number of U.S. shareholder climate-related proposals have almost doubled. Of these, 50% have targeted energy producers (oil, gas, utilities, and coal). Another 10% have targeted the financial institutions that lend to them.<sup>1</sup>

Alberta's oil sands have come under even greater pressure. Its higher carbon footprint relative to other types of oil production has caused a growing number of financial institutions to announce they will no longer invest or lend to this sector. These institutions include HSBC, BNP Paribas Group, Societe General of France, Blackrock and the Norway sovereign wealth fund. Jason Kenney, Alberta's premier, has responded by stating some of these very same companies invest in the Middle Eastern oil sector despite the bad human rights record of their host countries. He has threatened to ban these companies from doing business with the Alberta government.<sup>2</sup>

A growing number of oil majors now realize that tighter regulations and carbon taxes in one form or another are inevitable and are thus trying to adapt. Here are a few examples of this:

- Starting in 2024, ConocoPhillips will require that all projects be viable with a carbon tax of \$40.<sup>3</sup>
- Repsol of Spain became the first oil and gas company to set a target of net-zero emissions by 2050.<sup>4</sup> Simply put, it aims ultimately to offset all the carbon that it releases via such measures as carbon capture technology, improvements in efficiency, and the purchase of carbon credits.
- Soon after, BP also pledged to reduce its emissions to net zero by 2050, and make plans to increasingly diversify into cleaner energy
- Shell committed to reduce its emissions 3% by 2021 and 50% by 2050. Executive compensation will now be based in part on the achievement of these targets.
- Canadian oil companies, too, are taking similar positions. Cenovus Energy aims to lower its emissions per barrel 30% by 2030, and has pledged to attain the goal of net-zero emissions within three decades. Canadian Natural Resources and Meg Energy have set similar targets. Meanwhile, Suncor's objective is to reduce emissions 30% from 2014 levels by the end of this decade.<sup>5</sup>

<sup>1</sup> "Carbonomics," Goldman Sachs, December 13, 2019

<sup>2</sup> "Global Financial Giants Swear off Funding and Especially Dirty Fuel," The New York Times, February 12, 2020

<sup>3</sup> "Green fortunes will be made as the economy is forced to decarbonise," The Telegraph, January 24, 2020

<sup>4</sup> "Companies are being called to account for climate risks," Financial Times, January 8, 2020

<sup>5</sup> "Varcoe: Suncor forges a path to lower emissions – and lower costs," Calgary Herald, February 7, 2020

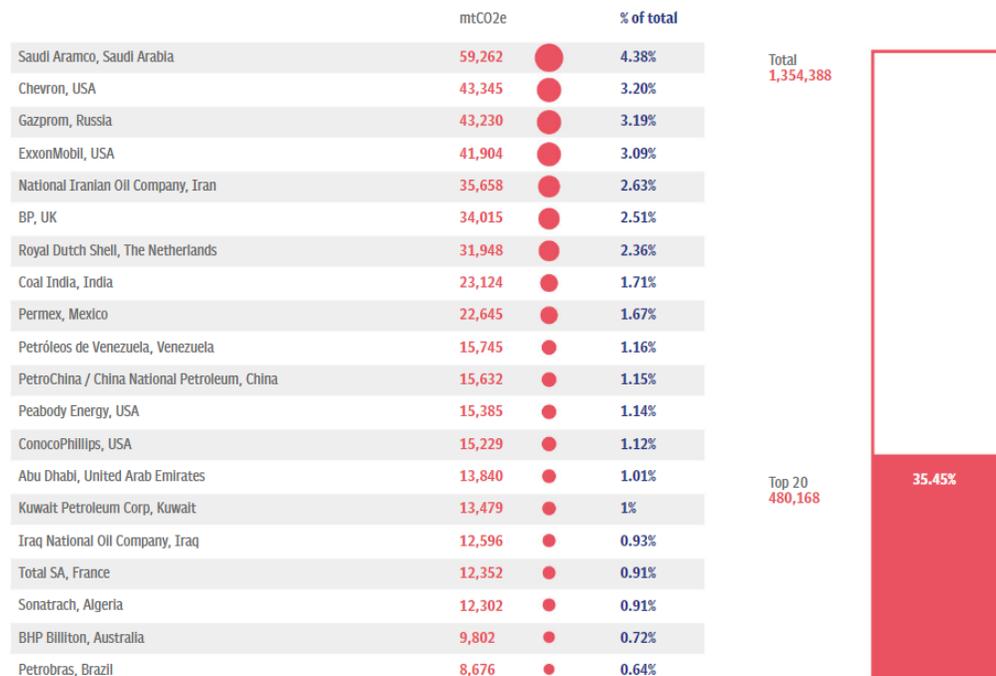
Three factors—the growing focus on the environment, worries that demand for oil could fall in the coming decades, and the low fossil-fuel prices of recent years—have combined to turn certain investors away from this sector.

From this standpoint, oil companies are increasingly stuck between a rock and a hard place. On the one hand, more and more investors are wary of putting their money in oil stocks either because they want greener energy or because they worry that oil consumption will decline in the future. On the other hand, if oil companies substantially increase their funding of alternative energy they risk alienating investors who simply want a solid return on their investment. These investors fear that money will go into areas perceived as being less profitable and thus threaten their dividend payments. While most of the larger oil companies have the funds to balance these two competing interests for the time being, the same cannot be said for their smaller counterparts.

Complicating matters further, it is estimated that 20 fossil fuel energy companies alone are responsible for 35% of all the greenhouse gas emissions over the past 50 years or so. This list is dominated by state-owned oil companies which, account for well over half of current global oil production.<sup>6</sup> Will institutional investors ultimately target these companies as well? And, if yes, how would their home countries react?

## The 20 firms behind a third of all global carbon emissions

Tonnes of carbon dioxide and methane contributed between 1965-2017, and the total %



SOURCE: CLIMATE ACCOUNTABILITY INSTITUTE

Source: "Green fortunes will be made as the economy is forced to decarbonise," The Telegraph, January 24, 2020

Some analysts have even warned of the long-term risk of the fossil fuel sector being starved of capital before the global economy has managed in large part to transition to renewable energy sources. Despite growing investments in alternative energy, the International Energy Agency projects that fossil fuel's share of global energy demand will fall only from 81% in 2018 to 74% by 2040. While this projection could end up underestimating the rate of growth in alternative energy, it is important to note that past energy transitions to electricity or gasoline-fueled cars took several decades to realize. Indeed, The Financial Times estimates that even if every car built from this moment on was electric, it would take 15 years to replace the world's 1.3 billion vehicles.<sup>7</sup>

<sup>6</sup> "The Oil and Gas Industry in Energy Transitions," International Energy Agency, January 2020

<sup>7</sup> "Can the world kick its oil habit?," Financial Times, February 13, 2020

## The EU's Ambitious Green Plan

Last November, the EU parliament proposed a bill to make the 27-nation bloc carbon neutral by 2050. If approved, the EU would be the world's largest economic bloc to officially adopt UN recommendations for all emissions to cease or be offset by mid-century. The EU's proposed target includes a 50-55% reduction in emissions from 1990 levels, up from the current target of 40%.<sup>8</sup>

### Massive costs involved

The EU Commission has estimated that reducing emissions 40% by 2030 from 1990 levels would require additional spending of 260 billion euros annually.<sup>9</sup> Proposals to raise the target another 10-15 percentage points would likely add to the bill.

To deal with the costs, the EU has proposed 1 trillion euros to help its members attain carbon neutrality by 2050. This, in theory, includes significant compensation for business sectors, countries and individuals that will be negatively impacted, at least initially, by the new regulations.

However, only 7.5 billion euros, which the EU has earmarked as seed funding to generate further investment, is classified as new money. The rest will be diverted from other sectors.<sup>10</sup> The European Commission has indicated that half of the investment will be redeployed from other EU budgetary items. National governments will contribute another 100 billion euros, and 300 billion euros will come from the private sector.<sup>11</sup>

Deciding on how to redeploy EU budgetary funds will inevitably raise tensions among member states. This will be magnified by Brexit, as the UK accounted for 11.26% of the EU's net budget contributions in 2018.<sup>12</sup> Recent media reports have estimated that the UK's departure from the EU could more than double Germany's annual contribution from 15 billion euros in 2020 to 33 billion euros in 2027 and that the Netherlands could see its net annual payments balloon from about 7.5 billion euros to 13 billion euros.<sup>13</sup> These estimates do not take into account the potential additional costs of the green plan.

The risk is that most Northern European countries will veto proposals that significantly raise their national contributions, while Southern and Eastern governments will block proposals that include major cuts to their funding. The EU's budget is approved by unanimity, which gives each member state veto power.

Over the longer term, the transition to a carbon-neutral economy entails both opportunities and risks for the EU. Under the positive scenario, the EU will leverage this transition to become a global leader across a wide range of environmental technologies. Under the negative scenario, continental Europe's historical tendency to favour more centralized and bureaucratic approaches will stifle innovation—a risk highlighted by the fact that Europe has produced very few of the world's cutting-edge companies in the past few decades.

## United States: A house divided

On the issue of the environment, the United States is divided along regional and partisan lines.

While the Trump administration is in the process of pulling out of the Paris Agreement, 24 states have pledged to maintain the Paris target of reducing emissions at least 26% from 2005 levels by 2025. If the Democrats regain the White House, they have promised to re-enter the agreement. The United States is currently set to formally withdraw from the deal on November 4, the day after the 2020 U.S. presidential election.

Another prominent example of this divide is the Trump administration's efforts to revoke California's authority to set higher auto mileage standards than those formulated by federal regulators. Another 14 states and the District of Columbia have followed California's lead. This dispute is currently being litigated in the courts.

<sup>8</sup> "The EU's Green Deal is full of ambition but needs more detail," The Economist, December 14, 2019

<sup>9</sup> "Plan to Kickstart EU's Green Deal Comes With \$1 Trillion in Cash," Bloomberg, January 9, 2020

<sup>10</sup> "EU's eye-catching green measures are not quite what they seem," Financial Times, January 27, 2020

<sup>11</sup> "EU lays out 1 trillion-euro plan to support Green Deal," Associated Press, January 14, 2020

<sup>12</sup> "Brexit Is Finally Here. Now What?," Geopolitical Futures, January 29, 2020

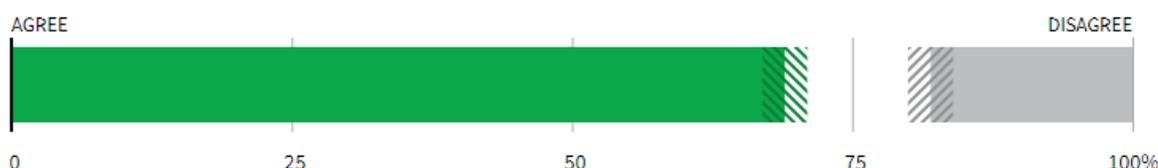
<sup>13</sup> "Germany's annual EU budget bill set to double to €33bn," Financial Times, October 27, 2019



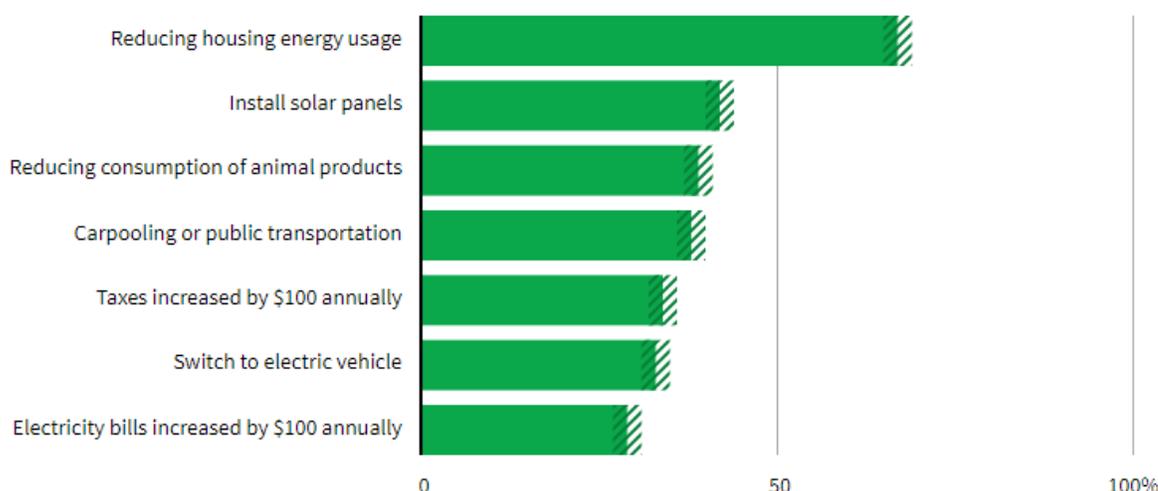
## While more Americans and Canadians are worried about climate change than before, many are still opposed to paying more taxes for the environment:

A poll commissioned by the Canadian Broadcasting Corporation in mid-2019 found that, while nearly two thirds of Canadians saw the fight against climate change as a top priority, half of those surveyed would not be in favour of paying more than \$100 in taxes annually to support the cause.<sup>17</sup> Another poll (see below) found that more than two thirds (almost 70%) of Americans, including a majority of Republicans, wanted the United States to take “aggressive” measures to combat climate change, but that only one third would support an environmental tax of \$100 a year.<sup>18</sup>

### To what extent do you agree or disagree that given the amount of greenhouse gasses that it produces, the United States should take aggressive action to slow global warming?



### How likely would you be to do the following in the next year to help limit climate change?



Note: Poll conducted between Jun. 11-14; Credibility interval: 2% pts.; Sample size: 3,281  
Source: Reuters/Ipsos  
By Sirui Zhu | REUTERS GRAPHICS

Source: “Americans demand climate action (as long as it doesn’t cost much),” Reuters, June 26, 2019

## How high do carbon taxes have to go to make a difference?

In order to help limit global warming to no more than 2 degrees Celsius by 2030, the IMF is pushing for large-emission countries to introduce a carbon tax that would rise to \$75 a ton by 2030.<sup>19</sup> If implemented, however, the tax would translate into an average 43% spike in household energy bills over the next decade. Currently, the average carbon tax levied by IMF member states is only \$2 a ton.<sup>20</sup>

Ideally, the best way to avoid a carbon backlash is to increase carbon taxes while lowering other taxes to keep the overall tax burden unchanged. However, most governments have proven unable to resist the temptation of using this new revenue for various special projects. To its credit, the IMF supports the idea of the extra revenue raised from the tax going to compensate citizens via cash transfers or tax cuts.

<sup>17</sup> “Canadians are worried about climate change, but many don’t want to pay taxes to fight it: Poll,” CBC, June 18, 2019

<sup>18</sup> “Americans demand climate action (as long as it doesn’t cost much),” Reuters, June 26, 2019

<sup>19</sup> “Fiscal Policies to Curb Climate Change,” IMF Blog, October 10, 2019

<sup>20</sup> “Energy bills will have to rise sharply to avoid climate crisis, says IMF,” The Guardian, October 11, 2019



Canada is one of the rare countries that has at least partially followed the above recommendations by passing a law stating that 90% of the revenues from a carbon tax will be returned to individual households in the provinces where the revenues are collected. Canada's Paris Agreement target is to reduce greenhouse gas emissions 30% from 2005 levels by 2030.<sup>21</sup> In his most recent throne speech, Prime Minister Justin Trudeau pledged to achieve "net-zero" emissions by 2050.

### Will differing environment regulations worsen trade tensions between countries?

European Commission President Ursula von der Leyen recently warned in a speech at the World Economic Forum that China and other large fossil-fuel producers must find a way to price carbon at home or risk being hit by the EU with a carbon tax on their exports: "It is not only a climate issue; it is also an issue of fairness towards our businesses and our workers. We will protect them from unfair competition."<sup>22</sup>

However, it is important to note that the EU has long been plagued by slow economic growth and still bears the economic and political scars of the 2008 financial crisis. Consequently, it is unlikely to want to overly escalate trade tensions with either the United States or China in the near term. This point is reinforced by the fact that the Eurozone's GDP grew just 0.1% in the fourth quarter of 2019.

While the prospect of an EU environmental border tax could raise tensions between Europe and the United States, the main conflict would ultimately be between the developed and developing world. This is because a border tax enacted by the EU, the United States or any other developed country would end up targeting mostly developing countries accused of having lower environmental standards.

### How to share burden of de-carbonization will be source of growing tension between the developed and developing world

China's carbon footprint is a perfect case in point. Many people in the developed world insist that China should do much more to control greenhouse gas emissions. They rightly point out that China has overtaken the United States as the world's top carbon emitter since the mid-2000s. It now accounts for 29% of global carbon dioxide emissions, compared with 16% for the United States, about 10% for the EU, and 7% for India.<sup>23</sup>

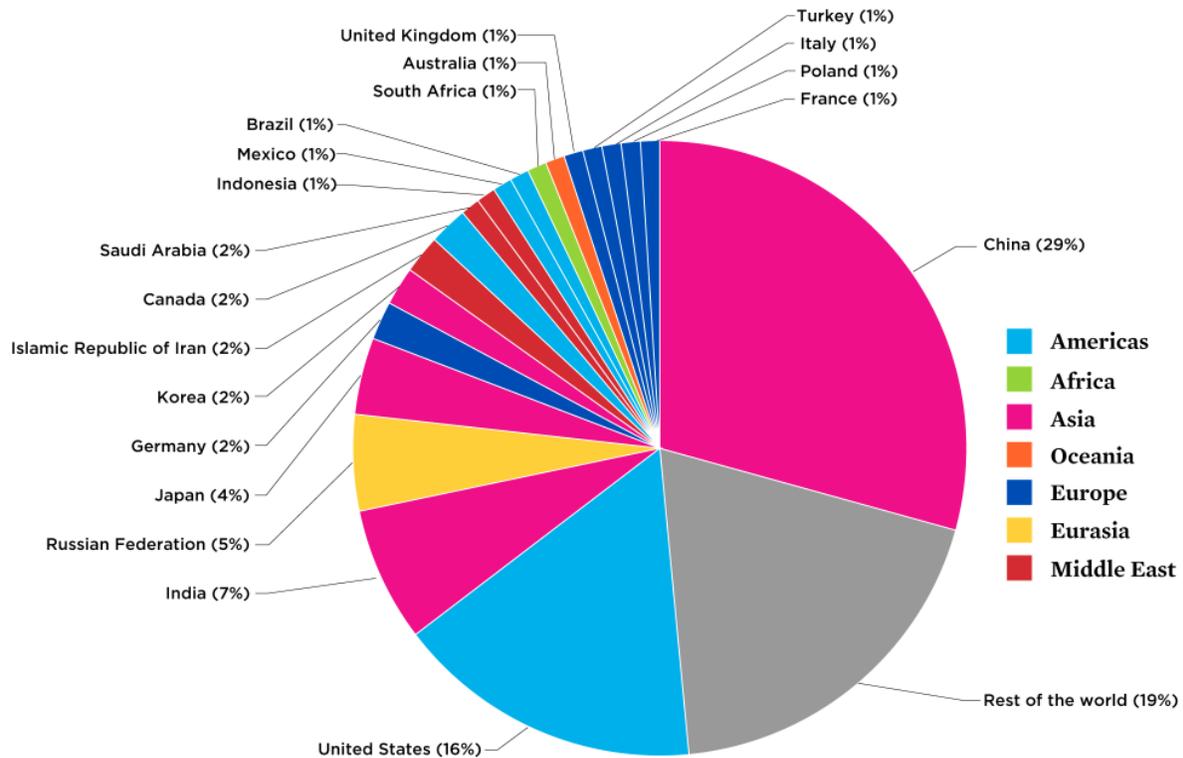
<sup>21</sup> "Most Canadian households will get back more than they pay from carbon tax, PBO finds," Financial Post, February 4, 2020

<sup>22</sup> "Davos 2020: Ursula von der Leyen warns China to price carbon or face tax," Financial Times, January 22, 2020

<sup>23</sup> "China, not America, will decide the fate of the planet," Financial Times, January 27, 2020

## Each Country's Share of CO2 Emissions

Published Jul 16, 2008 | Updated Oct 10, 2019



Source: Union of Concerned Scientists, October 2019

However, China has countered that its emissions per person are still much lower than that of the United States. Indeed, the average American is still responsible for more than twice as much carbon dioxide being released into the atmosphere than his/her Chinese counterpart.

It has been pointed out, also, that much of the reduction in emissions by the developed countries has been due to the fact that many of them have outsourced their emissions (i.e., factory production) to emerging countries. Moreover, the rich pollute overwhelmingly more than the poor do. In fact, the 10% richest people of the world generate almost half of the world's carbon emissions.<sup>24</sup>

<sup>24</sup> "Davos 2020: We need to talk about (sustainable) growth...," Deutsche Bank Research, January 13, 2020

## Per capita CO2 emissions on a country basis

| Rank | Country                  | CO <sub>2</sub> emissions (per capita) |
|------|--------------------------|--|
| 1    | Saudi Arabia             | 16.3T                                  |
| 2    | Australia                | 16.2T                                  |
| 3    | United States            | 15.0T                                  |
| 4    | Canada                   | 14.9T                                  |
| 5    | South Korea              | 11.6T                                  |
| 6    | Russian Federation       | 9.9T                                   |
| 7    | Japan                    | 9.0T                                   |
| 8    | Germany                  | 8.9T                                   |
| 9    | Poland                   | 7.7T                                   |
| 10   | South Africa             | 7.4T                                   |
| 11   | Islamic Republic of Iran | 7.1T                                   |
| 12   | China                    | 6.4T                                   |
| 13   | United Kingdom           | 5.6T                                   |
| 14   | Italy                    | 5.4T                                   |
| 15   | France                   | 4.5T                                   |

Source: Union of Concerned Scientists, October 2019

Fatih Birol, Executive Director of the International Energy Agency, recently summed up the wide perception gap that persists between much of the developed and developing world in the following statement: "The coal-powered plants in Europe are generating electricity for the fourth television set in the kitchen, whereas in India it is providing electricity for the refrigerators for parents to keep medication for their children."<sup>25</sup>

## Conclusion

To recap, the main geopolitical challenges that countries face in implementing more stringent climate regulations are as follows:

- The environmental policies must be able to stem global warming in the long term without having an overly large impact on economic growth in the short term. The weaker a country's economic growth, the greater the odds of a political backlash and of the environmental regulations in question being diluted or even reversed by an existing or new government.
- Implementing environmental programs that require significant financial investments in the short term at a time when many governments are already grappling with overstretched balance sheets. This includes getting public support from a citizenry that agrees climate change is a major problem, but is not necessarily in favour of paying a climate-related tax. **Attempting to thread this needle will likely mean continuing with easy money policies (QE and low interest rates). Some governments may decide to fund green projects via government bonds.**
- How the financial burden of environmental regulations should be shared among countries will generate tensions.
  - This risks widening the political divide between the EU countries that contribute the most funds to the EU budget and those that are net recipients and struggling economically.
  - Disagreements between developing and developed countries will be especially difficult to resolve. Poorer countries argue that they have historically contributed a far smaller volume of greenhouse gas emissions than richer industrialized countries have and that, consequently, they should be given much less stringent targets and significant financial assistance.
  - A carbon border adjustment tax implemented by Europe and some day even by the United States would likely target mostly developing countries and almost certainly be met with counter-tariffs.

<sup>25</sup> "Davos's green colonialism decried by poorer countries – but the West will crush them anyway," The Telegraph, January 24, 2020



## Economics and Strategy

### Montreal Office

514-879-2529

#### Stéfane Marion

*Chief Economist and Strategist*  
stefane.marion@nbc.ca

#### Krishen Rangasamy

*Senior Economist*  
krishen.rangasamy@nbc.ca

#### Kyle Dahms

*Economist*  
kyle.dahms@nbc.ca

#### Matthieu Arseneau

*Deputy Chief Economist*  
matthieu.arseneau@nbc.ca

#### Paul-André Pinsonnault

*Senior Economist*  
paulandre.pinsonnault@nbc.ca

#### Jocelyn Paquet

*Economist*  
jocelyn.paquet@nbc.ca

#### Marc Pinsonneault

*Senior Economist*  
marc.pinsonneault@nbc.ca

#### Angelo Katsoras

*Geopolitical Analyst*  
angelo.katsoras@nbc.ca

### Toronto Office

416-869-8598

#### Warren Lovely

*Chief Rate Strategist, Economics and Strategy*  
warren.lovely@nbc.ca

#### Taylor Schleich

*Associate, Rates Strategist, Economics and Strategy*  
taylor.schleich@nbc.ca

### General

This Report was prepared by National Bank Financial, Inc. (NBF), (a Canadian investment dealer, member of IIROC), an indirect wholly owned subsidiary of National Bank of Canada. National Bank of Canada is a public company listed on the Toronto Stock Exchange.

The particulars contained herein were obtained from sources which we believe to be reliable but are not guaranteed by us and may be incomplete and may be subject to change without notice. The information is current as of the date of this document. Neither the author nor NBF assumes any obligation to update the information or advise on further developments relating to the topics or securities discussed. The opinions expressed are based upon the author(s) analysis and interpretation of these particulars and are not to be construed as a solicitation or offer to buy or sell the securities mentioned herein, and nothing in this Report constitutes a representation that any investment strategy or recommendation contained herein is suitable or appropriate to a recipient's individual circumstances. In all cases, investors should conduct their own investigation and analysis of such information before taking or omitting to take any action in relation to securities or markets that are analyzed in this Report. The Report alone is not intended to form the basis for an investment decision, or to replace any due diligence or analytical work required by you in making an investment decision.

This Report is for distribution only under such circumstances as may be permitted by applicable law. This Report is not directed at you if NBF or any affiliate distributing this Report is prohibited or restricted by any legislation or regulation in any jurisdiction from making it available to you. You should satisfy yourself before reading it that NBF is permitted to provide this Report to you under relevant legislation and regulations.

National Bank of Canada Financial Markets is a trade name used by National Bank Financial and National Bank of Canada Financial Inc.

### Canadian Residents

NBF or its affiliates may engage in any trading strategies described herein for their own account or on a discretionary basis on behalf of certain clients and as market conditions change, may amend or change investment strategy including full and complete divestment. The trading interests of NBF and its affiliates may also be contrary to any opinions expressed in this Report.

NBF or its affiliates often act as financial advisor, agent or underwriter for certain issuers mentioned herein and may receive remuneration for its services. As well NBF and its affiliates and/or their officers, directors, representatives, associates, may have a position in the securities mentioned herein and may make purchases and/or sales of these securities from time to time in the open market or otherwise. NBF and its affiliates may make a market in securities mentioned in this Report. This Report may not be independent of the proprietary interests of NBF and its affiliates.

This Report is not considered a research product under Canadian law and regulation, and consequently is not governed by Canadian rules applicable to the publication and distribution of research Reports, including relevant restrictions or disclosures required to be included in research Reports.



### UK Residents

This Report is a marketing document. This Report has not been prepared in accordance with EU legal requirements designed to promote the independence of investment research and it is not subject to any prohibition on dealing ahead of the dissemination of investment research. In respect of the distribution of this Report to UK residents, NBF has approved the contents (including, where necessary, for the purposes of Section 21(1) of the Financial Services and Markets Act 2000). This Report is for information purposes only and does not constitute a personal recommendation, or investment, legal or tax advice. NBF and/or its parent and/or any companies within or affiliates of the National Bank of Canada group and/or any of their directors, officers and employees may have or may have had interests or long or short positions in, and may at any time make purchases and/or sales as principal or agent, or may act or may have acted as market maker in the relevant investments or related investments discussed in this Report, or may act or have acted as investment and/or commercial banker with respect hereto. The value of investments, and the income derived from them, can go down as well as up and you may not get back the amount invested. Past performance is not a guide to future performance. If an investment is denominated in a foreign currency, rates of exchange may have an adverse effect on the value of the investment. Investments which are illiquid may be difficult to sell or realise; it may also be difficult to obtain reliable information about their value or the extent of the risks to which they are exposed. Certain transactions, including those involving futures, swaps, and other derivatives, give rise to substantial risk and are not suitable for all investors. The investments contained in this Report are not available to retail customers and this Report is not for distribution to retail clients (within the meaning of the rules of the Financial Conduct Authority). Persons who are retail clients should not act or rely upon the information in this Report. This Report does not constitute or form part of any offer for sale or subscription of or solicitation of any offer to buy or subscribe for the securities described herein nor shall it or any part of it form the basis of or be relied on in connection with any contract or commitment whatsoever.

This information is only for distribution to Eligible Counterparties and Professional Clients in the United Kingdom within the meaning of the rules of the Financial Conduct Authority. NBF is authorised and regulated by the Financial Conduct Authority and has its registered office at 71 Fenchurch Street, London, EC3M 4HD.

NBF is not authorised by the Prudential Regulation Authority and the Financial Conduct Authority to accept deposits in the United Kingdom.

### U.S. Residents

With respect to the distribution of this report in the United States of America, National Bank of Canada Financial Inc. ("NBCFI") which is regulated by the Financial Industry Regulatory Authority (FINRA) and a member of the Securities Investor Protection Corporation (SIPC), an affiliate of NBF, accepts responsibility for its contents, subject to any terms set out above. To make further inquiry related to this report, or to effect any transaction, United States residents should contact their NBCFI registered representative.

This report is not a research report and is intended for Major U.S. Institutional Investors only.

This report is not subject to U.S. independence and disclosure standards applicable to research reports.

### HK Residents

With respect to the distribution of this report in Hong Kong by NBC Financial Markets Asia Limited ("NBCFMA") which is licensed by the Securities and Futures Commission ("SFC") to conduct Type 1 (dealing in securities) and Type 3 (leveraged foreign exchange trading) regulated activities, the contents of this report are solely for informational purposes. It has not been approved by, reviewed by, verified by or filed with any regulator in Hong Kong. Nothing herein is a recommendation, advice, offer or solicitation to buy or sell a product or service, nor an official confirmation of any transaction. None of the products issuers, NBCFMA or its affiliates or other persons or entities named herein are obliged to notify you of changes to any information and none of the foregoing assume any loss suffered by you in reliance of such information.

The content of this report may contain information about investment products which are not authorized by SFC for offering to the public in Hong Kong and such information will only be available to, those persons who are Professional Investors (as defined in the Securities and Futures Ordinance of Hong Kong ("SFO")). If you are in any doubt as to your status you should consult a financial adviser or contact us. This material is not meant to be marketing materials and is not intended for public distribution. Please note that neither this material nor the product referred to is authorized for sale by SFC. Please refer to product prospectus for full details.

There may be conflicts of interest relating to NBCFMA or its affiliates' businesses. These activities and interests include potential multiple advisory, transactional and financial and other interests in securities and instruments that may be purchased or sold by NBCFMA or its affiliates, or in other investment vehicles which are managed by NBCFMA or its affiliates that may purchase or sell such securities and instruments.

No other entity within the National Bank of Canada group, including National Bank of Canada and National Bank Financial Inc, is licensed or registered with the SFC. Accordingly, such entities and their employees are not permitted and do not intend to: (i) carry on a business in any regulated activity in Hong Kong; (ii) hold themselves out as carrying on a business in any regulated activity in Hong Kong; or (iii) actively market their services to the Hong Kong public.

### Copyright

This Report may not be reproduced in whole or in part, or further distributed or published or referred to in any manner whatsoever, nor may the information, opinions or conclusions contained in it be referred to without in each case the prior express written consent of NBF.