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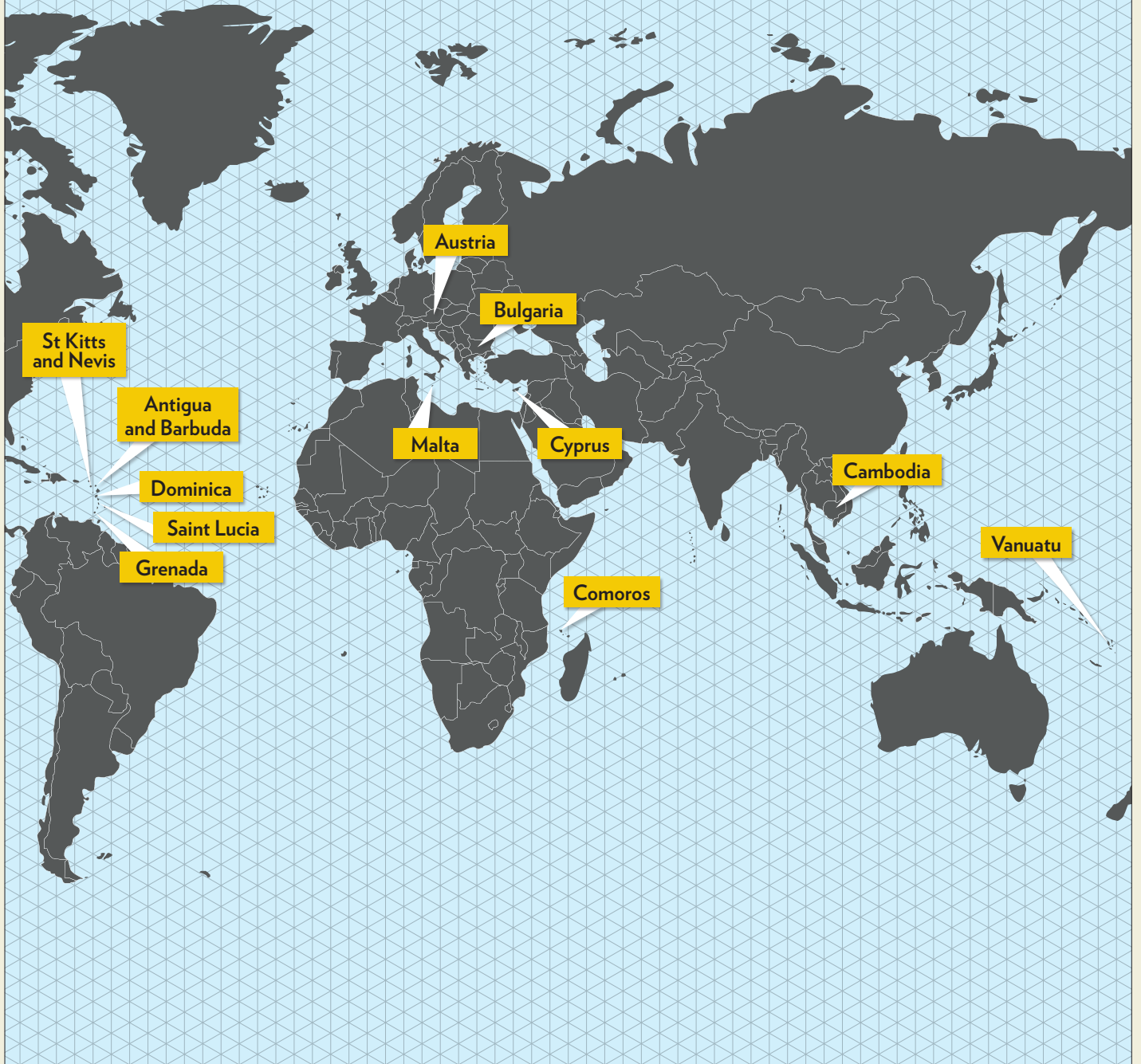
A GUIDE TO GLOBAL CITIZENSHIP

in association with

CS GLOBAL
PARTNERS



The 12 citizenship by investment jurisdictions



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CBI schemes can prove passport to stability in an uncertain world

WRITTEN BY YURI BENDER

INTRODUCTION

CBI schemes are attracting a huge amount of interest among wealthy families and the institutions serving them, but they are not without controversy

The sense of geopolitical instability fuelled by the UK's vote to leave the European Union and the subsequent election of Donald Trump as US president has only added to interest in Citizenship by Investment (CBI) schemes. These fast-track routes to citizenship and second passports, in return for major employment-creating investments in tourism, agriculture and infrastructure, are offered by a variety of countries in the Caribbean, Europe and Asia. While CBI schemes have created a

huge amount of interest in the wealth planning community, looking to add tools to their armoury, and among wealthy families searching for a range of potential jurisdictions in which to house their families and domicile their assets, they have also attracted controversy.

Their supporters say CBI schemes help to make people more mobile, allowing those escaping persecution and harsh political regimes a greater number of options. Their detractors say they are aimed primarily at Russian, Chinese and Middle Eastern tycoons who have acquired assets in questionable circumstances and are looking to escape justice by re-establishing their businesses elsewhere.

In reality, most oligarchs, magnates and other politically exposed wealthy people know that they can easily fall out of favour with their government. At one moment they can be perceived to be legitimate and are revered as

Today, especially since Trump and Brexit, everybody is wondering where they belong, how they fit in and how this will affect the future of their children

MICHA-ROSE EMMETT CS GLOBAL PARTNERS

Legal practitioners expect many UK residents to seek to obtain an additional passport with advantages of EU membership after Brexit

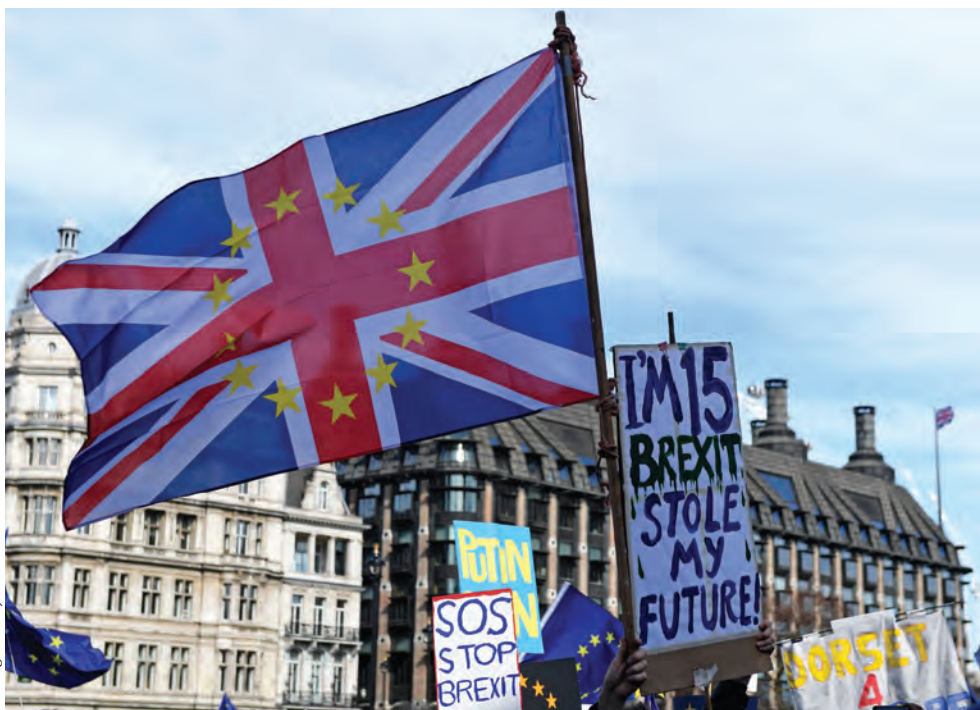
entrepreneurs and wealth creators, and at another they are portrayed as an "enemy of the people". Many of these business people therefore have a plan B, involving a second citizenship for themselves and their families, in exchange for making substantial investments in their new host countries.

SAFETY AND SECURITY

"CBI, more than ever is coming into its time," says Micha-Rose Emmett, CEO of CS Global Partners, specialising in citizenship, residence, immigration and foreign investment law.

"Today, especially since Trump and Brexit, everybody is wondering where they belong, how they fit in and how this will affect the future of their children," with safety and security the main priorities for those looking to expand the number of jurisdictions they can potentially settle in. She says that while few Syrians thought about emigrating in 2011, today, most would consider the option of a second home country, if they were allowed access to it.

"Some applicants derive from war-torn countries, or jurisdictions that are unable to provide them



All images: Getty

with basic freedom, and a second citizenship allows such persons to seek a better life,” suggests Emmanuel Nanthan, ambassador and head of the Citizenship By Investment Unit in the Commonwealth of Dominica, which launched its programme in 1993.

But CBI does not have to be the basis of a wealth management strategy, as it is often touted in countries such as China and Russia, where it is the main service discussed at the proliferation of wealth management conferences. The wealth planning process should look at family finances, business goals including cross-border expansion and tax liabilities, with the CBI option potentially able to feed into some family goals.

“Some clients want to start with the goal of relocation of citizenship,” says Ms Emmett. “But it should be just one factor, a piece in a puzzle for wealthy families, not necessarily the foundation of their strategy.”

For many clients, the attraction of establishing a new country of residence can be a strong one. In our new world of tax transparency, tax optimisation has become less of a question of moving assets to a low tax jurisdiction and more about structuring assets in the most efficient tax residence, suggests Shelby du Pasquier, head of the banking and financial services practice at Geneva lawyers Lenz & Staehelin and one of Switzerland’s leading experts in tax and financial services.

While EU nationals benefit from freedom to establish residency in the European Union and Switzerland, non-EU nationals have less options and many seek access to CBI schemes.

“This leads nationals from those countries to seek a jurisdiction within the EU that would allow them to secure a passport through an expedited process,” says Mr du Pasquier. Such a move can also be triggered by fear of future tax law changes.



Nationals from countries experiencing political or military instability have been interested, for the last few decades, in acquiring second passports to facilitate timely emigration, he says, with Chinese and Middle Eastern nationals historically seeking Canadian sanctuary. But the main driver of securing second citizenships today is tax, he believes, with Cyprus and Malta proving among the most popular jurisdictions for both EU and non-EU nationals. Some Caribbean centres, he says, offer quicker and cheaper CBI solutions.

But the practicalities of some schemes can be questionable, he says. New “homes” can prove ineffectual if the new nationals do not actually move to the host countries. “In my view, it is generally the actual residency in the appropriate politically stable, financially affluent country, offering an appropriate tax environment that offers the best protection, rather than another citizenship,” says Mr du Pasquier.

“Although the latter opens access to the former. One should also keep in mind the complication of travelling with certain of these exotic passports that will often require visas.”

This view is echoed by some host nations, where officials say applicants must be aware of the number of visa-free countries that they have access to, plus tax advantages and the level of political stability and long-term tenure

The earliest CBI scheme was lunched by St Kitts and Nevis

of a passport.

Due to current instability, Ms Emmett believes everybody should be looking at “diversification of nationalities”. Some people, she says, have the luxury of ancestry in their search for an alternative home country to the one they grew up in, while others have a “range of options and price levels to help them diversify”.

EVERYONE WINS

Although the schemes are transactional and not meritocratic, offering citizenship generally to those who can afford to move, they “add value to both client and country,” believes Ms Emmett, with those applicants benefiting from illicit money flows quickly shown the exit door.

Many countries use international due diligence agencies to trace the origins of funds and assets and establish legitimacy, with jurisdictions in the Caribbean generally having the “highest level of vetting of applicants. They could teach Israel, the UK and US a few things about vetting.”

The earliest CBI scheme came from St Kitts and Nevis during the 1980s, while Canada pioneered Investor Visas during the 1990s. Both proved popular with Chinese and Vietnamese investors looking for a North American exit. More recently, Dominica in the Caribbean and Malta in the Mediterranean, which has been offering CBI since January

The key is to have robust regulations and proper due diligence and vetting procedures so as not to allow individuals of ill repute to be able to get through

LES KHAN ST KITTS AND NEVIS CITIZENSHIP BY INVESTMENT UNIT

2014, have also provided schemes seen as high quality, high service offerings by practitioners.

“This is a service which aims to give peace of mind to high calibre individuals,” says Jonathan Cardona, CEO of Identity Malta, which manages the country’s Individual Investor Programme, commenting that CBI works best when linked with a well-regulated financial services centre. Among competitors, he says, Malta “offers the best programme as it is highly regulated, recognised by the European Commission and offers best practice in the field on a global level”.

CBI, which contributes approximately €120m (\$135m) each year to the Maltese economy, has however brought some discord to the tiny Mediterranean country. Malta’s prime minister Joseph Muscat recently

secured a second term amid corruption allegations, linked to the island’s CBI scheme.

“One supposed deal involved alleged kickbacks from Malta’s controversial, but lucrative, ‘cash for passports’ policy, which grants passports to non-EU nationals if they donate money to a government fund or buy local property,” reported the *Financial Times* newspaper, owned by the same parent company as *PWM*.

Cost differentials are large. Among those jurisdictions carrying out the most intense due diligence, Malta, offering the lure of EU membership for wealthy investors, requires a particularly high €1.2m (\$1.35m) outlay, compared to \$250,000 in St Kitts and Nevis and \$100,000 for Dominica.

As many smaller countries realise their natural resources are diminishing,

CBI can be controversial. Malta’s prime minister Joseph Muscat recently secured a second term amid corruption allegations, linked to the island’s CBI scheme

they are looking to find alternative means of supporting and building their economies, creating opportunities for direct foreign investments, says Les Khan, CEO of the Citizenship by Investment Unit for the Government of St Kitts and Nevis.

“The key is to have robust regulations and proper due diligence and vetting procedures so as not to allow individuals of ill repute to be able to get through,” he adds, stressing the importance of a sound financial system, with policies and regulations in place to ensure opportunities for money laundering and terrorist financing are not created.

Most applicants come from China, the Middle East and Russia. The current government administration has strengthened the due diligence process “to ensure that undesirables are kept out of the programme”. All applicants are scanned through sanction lists and Interpol for any “red flags”.

His country’s CBI programme was established in 1984, with a strategy to attract direct foreign investment to support an economy previously dependant on the sugar industry. The plan was to help boost a fledgling tourist industry, by investing in infrastructure and supporting social programmes.

Applicants, he says, should be keenly aware of the economic opportunities and stability related to their chosen host nation, drawing attention to the beaches, growing real estate market and tourist attractions of St Kitts and Nevis. Tourism, especially medical tourism, is one of the islands’ ‘pillars of growth’, also comprising renewable energy and agriculture.

“The clients need to know they are getting a citizenship that is of value in a stable economic and political environment,” says Mr Kahn.

Dominica’s scheme offers citizenship in return for “significant





Each new millionaire citizen making strategic investments in Austria must be approved by parliament

contribution” to the economy, either through donation to the Economic Diversification Fund, or purchase of “extensively vetted, pre-approved real estate”, which creates jobs in the construction industry. CBI money is also being used to reconstruct island capital Roseau’s West Bridge, develop drainage systems and build affordable housing for locals.

Construction of eco-friendly resorts is another key strategy, fuelling the island’s tourist industry by increasing visitor numbers. Luxury international hotels including the Hilton, the Marriott and the Kempinski have been attracted by the programme.

Following Tropical Storm Erika, which caused damage worth almost \$500m, Dominica’s government released \$100m of CBI funds to rebuild damaged homes, buildings, roads and bridges. Other CBI recipients include the geothermal energy project, involving construction of a power plant aimed at reducing energy costs.

Funds from the Economic Diversification Fund are used to

sponsor training programmes to reduce unemployment among young Dominicans. Due diligence checks include vetting at regional CARICOM level in addition to Dominican government procedures. Officials in Dominica talk about a “joint effort” among Caribbean countries to maintain regional security, integrity and reputation.

COMPETITIVE EDGE

Cyprus, also acting as a gateway to the EU, is becoming more competitive, requiring an investment of €15m prior to 2014, now down to €2m. Grenada is also popular as citizens can then preferentially apply for US residence through the US E2 Visa scheme. A lack of certainty can dissuade applicants looking to countries such as Austria, where each new millionaire citizen making strategic investments must be approved by parliament, therefore requiring lobbying of individual politicians.

Commenting on schemes she has experienced from her client base,

Natacha Onawelho-Loren, head of Legal, Trust and Fiduciary at the Salamanca Group in Geneva says:

“Malta has strict vetting rules. The process seems arduous at first but local law firms are at hand to help you navigate the system. Cyprus, with its investors’ programme, seems to offer a clear path to citizenship, once the KYC hurdle is gone through.”

The trend to second citizenship can only increase, she believes, as “having more than one passport is already a fact of life for an increasing number of individuals and not only for the ultra-wealthy”.

Legal practitioners expect many UK residents to seek to obtain an additional passport with advantages of EU membership after Brexit, including visa-free travel across the bloc and the right to settle and work in any member state. More countries are also expected to offer residency to the wealthy on favourable terms, Portugal and Italy joining the club.

“The trend will accelerate to attract those with capital, in need of stability or simply not wishing to be subjected to the whims of their own government,” says Ms Onawelho-Loren, while also helping revive economies during tough times.

Indeed dual citizenship, say its facilitators, is well on the path to becoming the norm. “Obtaining a second or third citizenship does not necessarily change one’s identity, but rather it broadens the opportunities available to a person, whether it be venturing into another market or calling a new place home,” says Mr Nanthan at the Commonwealth of Dominica.

“Second citizenship is the the key to freedom of movement, and in some cases, security for oneself and one’s family. It serves as a platform for becoming a global citizen.” [PwM](#)

Introducing the researcher

The Citizenship by Investment (CBI) Index is the brainchild of James McKay, a research analyst and consultant with more than a decade's experience in the implementation and execution of complex research and data analysis projects.

Upon obtaining a degree in psychology and statistics from University College London, James gained considerable research experience working in the fields of fast-moving consumer goods (FMCGs), pharmaceuticals, and later, finance and investment. This

then impelled him to turn his attention to one of the most dynamic sectors of modern immigration: citizenship by investment.

James used guidance from the OECD's Handbook on Constructing Composite Indicators, and applied a five-stage process to produce the CBI Index.

The first, 'pre-proposal stage' required him to attend meetings, speak to experts, and gain general knowledge on economic citizenship.

The second, 'proposal stage' saw him design the CBI Index.

The third, 'information gathering

stage' involved the collection of primary and secondary data, such as the laws, regulations, and practices of the many jurisdictions currently offering citizenship by investment to qualifying foreigners.

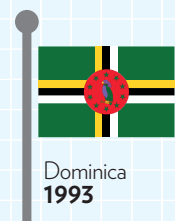
The fourth, 'product build' stage comprised the analysis and interpretation of the collected data.

The final and fifth 'review stage' saw James make a final assessment of results.

James is proud to have generated the first-ever up-to-date, comprehensive breakdown of today's citizenship by investment programmes. ●

THE HISTORY OF CBI

St Kitts and Nevis was the first nation to implement citizenship by investment, enshrining it in its laws shortly after achieving independence. Austria passed its relevant nationality legislation one year later. For almost a decade, citizenship by investment would not be employed by other countries, until the Commonwealth of Dominica launched its own programme. Starting with 2002, the number of countries adopting citizenship by investment steadily increased, with 2013 and 2014 seeing the introduction of four programmes in three different continents.



1980's

1990's

St Kitts and Nevis
1984



Austria
1985



The CBI Index: why, what, who and when

WHY

The CBI Index operates as a comprehensive ranking system to evaluate active citizenship by investment programmes, delivering objectivity and accuracy in an industry that can at times be subject to misinformation.

Relying on quantitative and qualitative research, and bringing together distributed pockets of data, the CBI Index is also an integrated resource designed to facilitate reference and review of citizenship by investment programmes, and to provide a single, comprehensive tool on which analysis and personal evaluation can be based.

WHAT

The CBI Index allows for two modes of comparison: a ranking of the overall performance and desirability of 12 CBI programmes, and a ranking by reference to seven 'pillars'. The latter focuses on specific programme factors, such as mandatory travel and residence requirements, allowing readers to isolate programme attributes and create a citizenship strategy focused on their individual priorities.

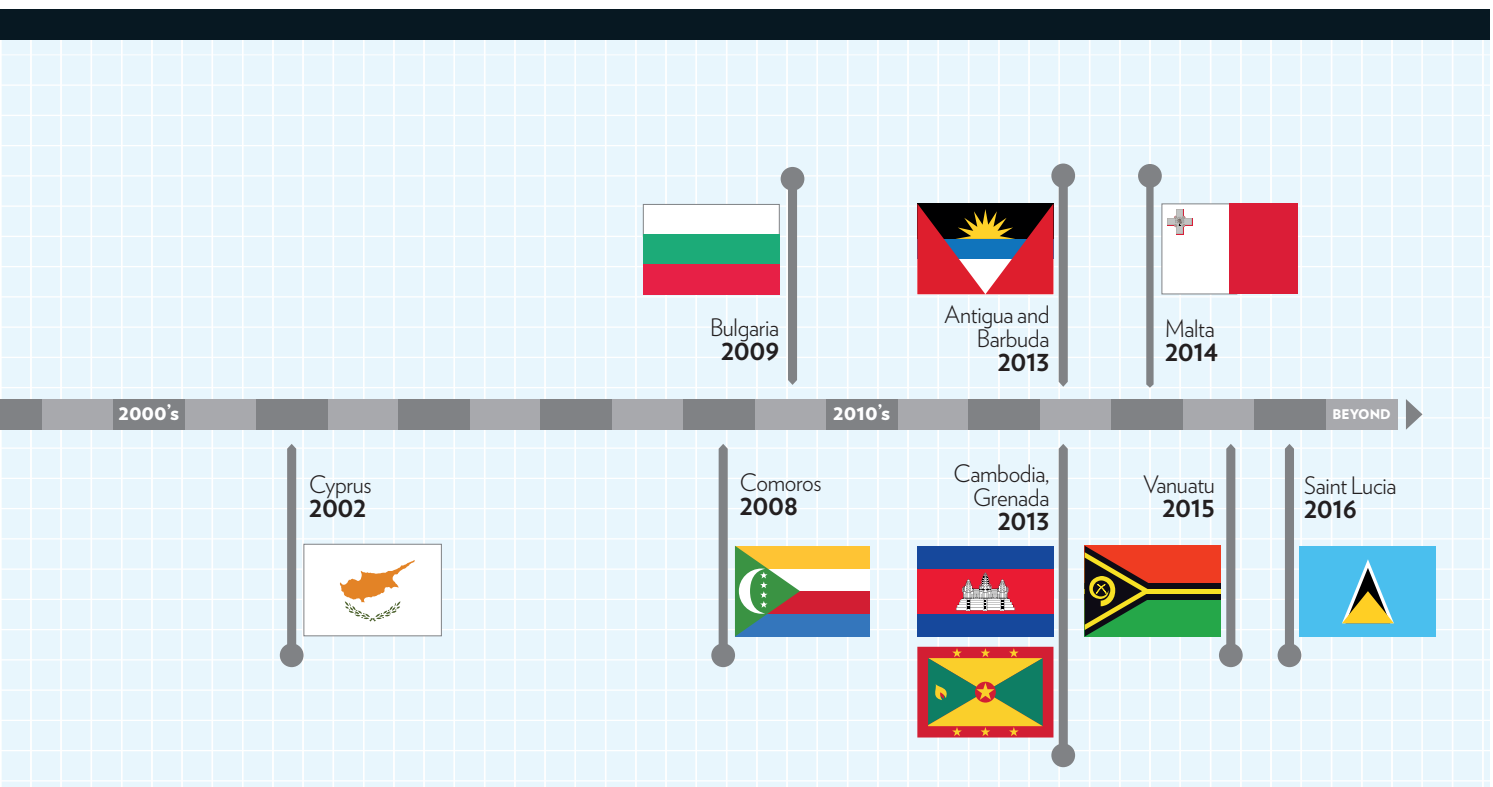
WHO

The CBI Index is intended for the use, in the first instance, of finance advisers, attorneys, and practitioners. In the second instance, it is hoped that businesspersons, investors, and

international families will themselves take the opportunity to assess the citizenship by investment options currently available to them. In both cases, the CBI Index will assist the making of sound decisions on citizenship by investment, help assess current trends, and predict future ones.

WHEN

The CBI Index is constantly evolving, responding to changes in the legal framework in which the programmes exist, and to the socio-economic developments that shape citizenship by investment jurisdictions. In line with our commitment to truth and exactness, the CBI Index will therefore be re-issued on an annual basis. ●



Becoming a citizen

WHAT IS CITIZENSHIP?

Citizenship diversification, just like asset diversification, can ensure that the onuses of citizenship never outweigh the advantages

One of the core attributes of citizenship by investment programmes is their aptitude for openness – allowing individuals to obtain dual nationality without needing to demonstrate ancestral ties to a host country, or family connections with current citizens.

Nationality and identity feature prominently in the public discourse,

even as their meaning becomes less intelligible. What is it to be a 'national', what benefits attach to that classification, and how likely is it that those benefits will persist in the future?

Generally, being a 'national' or 'citizen' of a country means an individual is entitled to certain civil rights and protections, and, in return, is bound by duties and allegiance.

However, as countries disaffiliate themselves from international organisations, embrace isolationist policies, and begin to close themselves to global trade and connectivity, what those rights may truly entail becomes less clear. Will Britons be able to live and work in Europe tomorrow? And will US citizens continue to hold the

same freedom to trade and travel as they do today?

Citizenship diversification, just like asset diversification, can ensure that the onuses of citizenship never outweigh the advantages, as the latter can be derived from multiple, independent channels.

The CBI Index makes it possible for persons to determine whether, on balance, the acquisition and relinquishment of liberties makes citizenship of a particular country a step worth taking.

It is thus an assessment tool for individuals actively seeking to preserve, or even improve, their standing vis-à-vis their government and the international community as a whole. ●

Generally, being a 'national' or 'citizen' of a country means an individual is entitled to certain civil rights and protections, and, in return, is bound by duties and allegiance



Selecting citizenship by investment

THE SELECTION PROCESS

For the applicant, citizenship by investment can represent freedom, safety, and wellbeing

Many individuals realise the importance of second citizenship and seek routes to obtain an alternative citizenship.

While traditional methods of obtaining a second citizenship, such as by birth, descent, marriage, or residence, remain available to qualifying applicants in many jurisdictions, citizenship by investment assures freedom of mobility and financial security within the framework of speedy processing.

Citizenship by investment programmes operate to strengthen a nation's economy by the injection of foreign direct investment, while bestowing upon applicants the gift of citizenship. Generally, an applicant must thus make an investment so significant that it is likely to have a visible impact on the nation's economy.

Avenues for investment vary from one jurisdiction to the other, although most favour providing an option between a contribution to a government-run national development fund and a real estate purchase. Government bonds are also a prevalent alternative, as is the purchase of corporations.

For host nations, citizenship by investment can provide much-needed financial support, reinvigorating the economy both directly – through donations to charitable entities or state-sponsored initiatives – and indirectly, such as by raising demand for real estate. For the applicant,



second citizenship can represent freedom, safety, and wellbeing.

The world's earliest citizenship by investment programme was launched in 1984 by St Kitts and Nevis. Having gained prominence across the Caribbean, citizenship by investment is now administered in Europe, Africa, and Asia – allowing prospective applicants to choose a jurisdiction from almost any corner of the globe.

The CBI Index endeavours to provide such prospective applicants with the tools they require to make a learned decision on which of these many locations would best suit their needs. ●

“Most jurisdictions favour providing an option between a contribution to a government-run national development fund and a real estate purchase

Due diligence: the key to a successful programme

DUE DILIGENCE

The standards and the integrity of due diligence checks form the bedrock of CBI programmes

The expansion of citizenship by investment over the past five years has seen the equally rapid increase in competition between the countries that offer such economic citizenship programmes as they vie with each other for investors.

This competition has at times resulted in a reduction in the investment threshold requirements. Combined with a backdrop of growing levels of uncertainty in parts of the world – the scene is set for a record surge of interest in citizenship by investment.

Change in the international, political, and economic landscape has brought with it the need for more detailed levels

of scrutiny, with a focus on financial crime. Terrorist financing, sanctions violations, bribery, corruption, fraud, and money laundering are all under the microscope. This is nothing new, but the stakes are much higher in the citizenship by investment context, because countries seek to protect the integrity of their programmes, the reputation of their institutions, and the value of their citizenship.

Due diligence takes centre stage as it is incumbent upon the citizenship programmes to demonstrate transparency and, more importantly, to ensure they have robust processes, policies, and procedures in place.

Many programmes, particularly those of the Caribbean, are at the vanguard – leading the evolution of due diligence beyond the basic online checks that are undertaken by other countries. The best programmes see the inclusion of on-the-ground enquiries, second-tier corroborative interviews, biometrics,

and, most importantly, live ongoing monitoring of applicants.

This latest element is mirrored in the financial services sector – traditionally at the forefront of development in due diligence regulation, fines, and other forms of disciplinary action. It was only in 2012 that HSBC agreed to pay the US authorities \$1.9bn in a settlement over money laundering.

The standards and integrity of due diligence checks are, and will continue to be, the bedrock of the programmes and their ongoing success, especially as they attract investors from emerging markets or jurisdictions torn by war and political or economic uncertainty.

It is worth remembering however that not all applicants for citizenship come from emerging markets or ‘broken states’. We can look closer to home. Following the Brexit result, for example, Ireland witnessed a 2,000 per cent increase in applicants from the UK. ●

The best programmes see the inclusion of on-the-ground enquiries, second-tier corroborative interviews, biometrics, and live ongoing monitoring of applicants



National empowerment through economic support

ALLOCATION OF FUNDS

If the funds raised through citizenship by investment programmes are properly allocated it can lead to a noticeable upturn in a nation's fortunes

Citizenship by investment programmes return a substantial amount of economic revenue to host countries, particularly when these are small island developing states. A remarkable growth story can be seen in St Kitts and Nevis, where, according to the IMF, in 2015 the Citizenship by Investment Programme contributed to 12 per cent of the national GDP, and assisted the country in cutting its public debt from 159 percent of GDP – a figure recorded in 2010 – to 68 per cent.

Judicious allocation of citizenship by investment funds can thus result in an upturn of fortunes for nations, and in the implementation of critical development agendas.

In St Kitts and Nevis, funds donated to the Sugar Industry Diversification

Foundation (SIDF) have been used to support construction, agriculture, education, and entrepreneurship. Projects that have had an immediate effect on the economy include the Agricultural Training Employment Project and the Capisterre Farm Project, which have created employment opportunities for local farmers and boosted production. Meanwhile, long-term undertakings such as the Student Loans Initiative and the Small Entrepreneur and Enterprise Development Programme ensure the next generation of Kittitians and Nevisians will be well placed to meet future challenges and develop key business skills.

Illustrating how citizenship by investment can emerge as a lifeline in times of distress is the Commonwealth of Dominica. In recent years, Dominica's Citizenship by Investment Programme has come to contribute significantly to the nation's GDP. However, the island was never so grateful to have established the programme than in August 2015, when Tropical Storm Erika severely damaged infrastructure and property. The programme, which in the 2015/2016 fiscal year generated a significant portion of GDP, allowed the government to focus on "building a more resilient Dominica", with infrastructure projects taking centre stage.

The rehabilitation of Douglas Charles Airport, the Storm Erika Rehabilitation Works Project, and the House Renovation and Sanitation Programme, are just a few key examples. Other ventures sponsored by the programme include geothermal power, small businesses, and tourism facilities.

While Dominica was proactive in the establishment of its programme, Vanuatu did so reactively, launching its Vanuatu Economic Rehabilitation Programme (VERP) after the passing of Cyclone Pam in March 2015. VERP funds are redirected to easing the severe economic contraction suffered because of the tropical cyclone.

How citizenship by investment funds are allocated is crucial to many nations' welfare and sustainable development. Governments that establish funds for citizenship by investment donations are able to earmark revenue for specific projects, as and when a need is identified, depending on how the fund was set up.

Furthermore, the more governments become transparent in their distribution of revenues from citizenship by investment, the more applicants can recognise the value of their contributions, and the impact that they may have on their new, fellow nationals. ●



Vanuatu launched its Vanuatu Economic Rehabilitation Programme (VERP) after the passing of Cyclone Pam in March 2015

The prerogative of only a few?

A GLOBAL APPEAL

Host nations are receiving applications from peoples of disparate cultures and backgrounds, united in their desire for a better life

One of the core attributes of citizenship by investment programmes is their aptitude for openness – allowing individuals to obtain dual nationality without needing to demonstrate ancestral ties to a host country, or family connections with current citizens.

They also release applicants from lengthy residence requirements, thus meaning that, even within the bounds of what the applicant could have achieved independently of others, citizenship by investment does not require a previous

bond with the country.

It is this openness that has encouraged investors to secure a second citizenship even in nations very distant from their own. For host countries, this has translated into applications from peoples of disparate cultures and backgrounds, united however in their desire for a better life, greater freedom, and personal security.

Given this far-reaching open-door policy, is citizenship by investment more appealing to certain national or ethnic groups than it is to others?

Antigua and Barbuda, which set up its Citizenship by Investment Programme in 2013, recorded primary interest from Asia and the Middle East. In a report released on March 3, 2016, the country's Citizenship by Investment Unit revealed that, since the programme's inception, nearly 45 per cent of applications had been received from Chinese nationals. The Unit further noted

The quest for second citizenship is not synonymous with certain national groups or regional communities

that 5.5 per cent of applications came from Lebanon, while a similar number originated from Syria.

Between its inauguration in March 2014 and June of that year, Malta's Individual Investor Programme saw almost 60 per



cent of its applications come from a single region: the former Soviet Union.

The examples provided by Antigua and Barbuda and Malta seem to suggest citizenship by investment is always dominated by particular national groups. However, other countries, such as the Commonwealth of Dominica and St Kitts and Nevis, have served as points of convergence for applicants with very diverse backgrounds.

In 2012, the former prime minister of St Kitts and Nevis, Denzil L. Douglas, disclosed that the St Kitts and Nevis Citizenship by Investment Unit had processed applications from the US, Dubai, Russia, Yemen, and Singapore. Today, applicants are welcome from across the globe, although St Kitts and Nevis still retains a security ban on Iranian and Afghan nationals. Dominica, a country that invites

60%

BETWEEN ITS INAUGURATION IN MARCH 2014 AND JUNE OF THAT YEAR, MALTA'S INDIVIDUAL INVESTOR PROGRAMME SAW ALMOST 60 PER CENT OF ITS APPLICATIONS COME FROM A SINGLE REGION: THE FORMER SOVIET UNION

participants from all nations to its programme, has also received applications from around the world. Not surprisingly, both countries have long-established citizenship by investment programmes

and have built a reputation of trust among international allies, authorised agents, and industry professionals alike.

Though little is known about the wider demographic of applicants for Comorian citizenship under its Economic Investment Programme, a high number of citizenships were awarded to the Bidoons – stateless persons of Arabic descent. Notably, the Bidoons were awarded Comorian citizenship by intervention of the governments of Kuwait and of the United Arab Emirates.

The quest for second citizenship thus seems not to be synonymous with certain national groups or regional communities, and, as home countries continue in their pursuit of restrictive policies and uncertain strategies, more and more international applicants will be attracted to the prospect of dual nationality in a welcoming, open nation. ●



Overview of the methodology

METHODOLOGY

The CBI Index is built around seven pillars, designed to satisfactorily measure global citizenship programme features and jurisdictional desirability

The CBI Index is a rating system designed to measure the performance and appeal of global citizenship by investment programmes across a broad range of indicators. Its purpose is to provide a rigorous and systematic mechanism for assessing citizenship programmes, to facilitate the decision-making process for individuals considering them, and to bring value to the citizenship industry.

The CBI Index assesses all countries with operational citizenship by investment programmes, which today include the following 12 nations: Antigua and Barbuda, Austria, Bulgaria, Cambodia, Comoros, Cyprus, Dominica, Grenada, Malta, Saint Lucia, St Kitts and Nevis, and Vanuatu.

A primary methodological objective was to isolate factors that could satisfactorily measure programme features and jurisdictional desirability. Seven factors, or 'pillars', were identified for this purpose. The seven pillars that constitute the CBI Index include:

1. Freedom of Movement
2. Standard of Living
3. Minimum Investment Outlay
4. Mandatory Travel or Residence
5. Citizenship Timeline
6. Ease of Processing
7. Due Diligence

Arriving at an appropriate rating for the seven pillars involved a complex combination of benchmarking, statistical analysis, and comparative investigation.

Each of the seven pillars is scored out of a maximum of 10 points, calculated on an averaging basis from the scores of composite indicators and sub-indicators. The maximum attainable score achievable by a programme is 70, with all final scores expressed in terms of a percentage of the total points available. For example, a perfect, 70-point score would be expressed as 100 per cent.

It should be noted that, due to the vast number of statistics, indicators, and sub-indicators available for analysis, no single approach exists for the rating of citizenship by investment programmes. In framing the CBI Index however, reliance was only placed on official sources from institutions of the highest international standing and on the specialised input of industry experts, whose contributions and responses were used to obtain and interpret both qualitative and quantitative data used in the construction of the CBI Index.

PILLAR 1: FREEDOM OF MOVEMENT

The Freedom of Movement Pillar measures a passport's relative strength by the number of destinations to which it allows travel without restriction, and by the amount of prime business hubs to which it provides access. It is assumed, for the purposes of this pillar, that the passport used for travel is an ordinary passport, and not a diplomatic or service passport.

Freedom of movement within and between countries is of paramount importance to any individual seeking second citizenship. This holds true whether the individual wishes to travel for work purposes, to visit family, or for leisure.

Emphasis was placed on the total number of countries and territories that may be visited without applying for a visa. This included both visa-free and visa-on-arrival destinations, as neither require

“Arriving at an appropriate rating for the seven pillars involved a complex combination of benchmarking, statistical analysis, and comparative investigation

persons to receive a visa in advance of travel. Government and other official sources, including data from the United Nations World Tourism Organisation (UNWTO), were used to obtain up-to-date information on visa requirements for holders of each of the twelve passports under evaluation.

As business travel is a prime consideration for prospective global citizens, a passport's ability to provide access to the world's leading economic and financial centres was also evaluated. The World Bank's Ease of Doing Business Index, the World Economic Forum's Global Competitiveness Report, and other authoritative sources were used to arrive at a list of the top centres for international business.

In alphabetical order, the list included: Australia, Canada, Denmark, Estonia, Finland, Georgia, Germany, Hong Kong, Latvia, Luxembourg, New Zealand, the



The Freedom of Movement Pillar measures a passport's relative strength by the number of destinations to which it allows travel without restriction, and by the amount of prime business hubs to which it provides access

or needing to transfer and safeguard their assets.

For this pillar, a wide range of official indicators was considered to allow for an accurate assessment. Consequently, establishing an appropriate benchmark was of paramount importance, as a country's score must be viewed both as an absolute value and within the context of the other citizenship by investment countries – that is to say, as a relative value.

Reliance was placed on the United Nations' Human Development Index (HDI) for factors such as life expectancy, education, security, and income.

As past performance is not always a guarantee of future results in the field of economic growth and development, latest projected statistics based on present-day economic circumstances were used to gauge a country's gross domestic product (GDP) growth trajectory. Data was sourced from the International Monetary Fund's World Economic Outlook to ensure accuracy and consistency.

The Standard of Living Pillar also examines a country's ability to promote freedom, and to protect the rights of individuals to act and to express themselves without undue constraints. Civil liberties and political rights within a jurisdiction were rated as part of this exercise, using sources such as Freedom House's Freedom in the World Index.

PILLAR 3: MINIMUM INVESTMENT OUTLAY

The Minimum Investment Outlay Pillar measures one of the most practical and foremost considerations of citizenship by investment: how much capital is required for the investor to become an eligible applicant for the programme of his or her choosing.

The cost of applying for citizenship by investment increases with the number of dependants – or qualifying family

Netherlands, Norway, Singapore, Sweden, Switzerland, Taiwan, the United Arab Emirates, the UK, and the United States.

For both indicators, points were awarded on a descending scale, with the highest score received by the passport with visa-free or visa-upon-arrival entry to the highest number of foreign countries or territories.

PILLAR 2: STANDARD OF LIVING

The Standard of Living Pillar is a measure of the quality of life offered by the 12 citizenship by investment jurisdictions under assessment. This pillar is vital to those who yearn to relocate and to secure a prosperous and fulfilling lifestyle. Similarly, it is key to those wanting to take advantage of local business opportunities,

The Standard of Living Pillar examines a country's ability to promote freedom, and to protect the rights of individuals to act and to express themselves without undue constraints

members – included in an application. In some jurisdictions this increase is proportional, while in others the cost only increases following the inclusion of multiple dependants. To remain consistent across all jurisdictions, it was assumed that one applicant was applying for citizenship alone. That is to say, that the application consisted of a ‘single applicant’.

Where a citizenship by investment programme offered multiple investment options, the most affordable option was selected for evaluation. For example, St Kitts and Nevis offers a single applicant the choice between a contribution to the Sugar Industry Diversification Foundation (commonly known as the SIDF) and an investment in pre-approved real estate, with the latter being the more expensive alternative. The SIDF option was therefore used to determine the minimum investment outlay for the St Kitts and Nevis Citizenship by Investment Programme.

The pillar considers pure investment requirements, exclusive of minor fees that may also apply. These may include application, processing, or due diligence fees that are similar across programmes and that do not significantly alter the cost

of a citizenship application.

The highest number of points was awarded to the country requiring the lowest minimum investment.

PILLAR 4: MANDATORY TRAVEL OR RESIDENCE

The Mandatory Travel or Residence Pillar examines the travel or residence conditions imposed on applicants both before and after the granting of full citizenship. Often busy with running a business or with international travel of their own, citizens of the world have little time on their hands to fulfil minimum stay requirements.

A careful examination of the laws, regulations, and policies pertaining to each citizenship by investment programme was undertaken. First, it was determined whether any travel or residence prerequisites applied. Second, post-citizenship requirements were examined, as well as the consequences of failing to fulfil those requirements. Third, the extent of the travel or residence requirements was analysed, with physical visits for the purposes of attending an interview, swearing an oath of allegiance, or giving biometric information all taken into account. Additionally, mandatory

“As having year-round freedom to travel is a highly-valued liberty, programmes that waived residence and travel requirements achieved the best score

travel that could only be waived or eased following the payment of a costly fee was also given consideration.

In line with the previous pillars, scrutiny focused on the main applicant rather than any dependants that may be included in the citizenship application.

As having year-round freedom to travel is a highly-valued liberty, programmes that waived residence and travel requirements achieved the best score, followed by those with minimal requirements. The lowest scores were attained by programmes with extensive requirements.

PILLAR 5: CITIZENSHIP TIMELINE

The Citizenship Timeline Pillar analyses the average time taken from when an application is submitted to the relevant government body, to when the applicant is granted citizenship and receives his or her passport – the document most frequently used by an individual to travel and prove his or her identity.

The speed at which application forms



Often busy with running a business or with international travel of their own, citizens of the world have little time on their hands to fulfil minimum stay requirements



Strict anti-terrorism and anti-money laundering (AML) legislation has prompted some governments to prohibit persons of certain nationalities from applying for citizenship, or to restrict funds transferred from certain jurisdictions in order to ensure compliance with international sanctions

and supporting documentation are processed, and the steps involved in approving an application, vary from programme to programme. Therefore, a thorough inspection of applicable laws, regulations, and policies was made to determine the official processing times mandated by each jurisdiction.

Extensive reliance was also placed on first-hand experience from applicants, agents, and other stakeholders, whose contributions proved to be an invaluable tool in ascertaining citizenship timelines.

As one of the key merits of citizenship by investment programmes is their ability to provide a rapid route to second citizenship, the highest number of points was awarded to the programmes with the shortest passport turnaround times.

Extra points were awarded to programmes offering fast-track processing options at an additional fee, as these provide an extra layer of certainty for the applicant who is urgently in need of his or her second citizenship.

PILLAR 6: EASE OF PROCESSING

The Ease of Processing Pillar measures the end-to-end complexity of the citizenship by investment application process. In some jurisdictions, the

application process can be a labour-intensive and painstaking task that is time-consuming for the applicant; in others, it is streamlined and the applicant receives clear directives on how to proceed. For the ever-busy, internationally-minded individual, the overall effortlessness of the application process is a particularly critical component and a smooth, hassle-free process can generate readiness to engage with a programme.

Multiple indicators were considered, commencing with entry qualifications such as previous business experience or fluency in a language. Knowledge of local history or culture assessments and interview requirements were also weighed.

By its very nature as a naturalisation process, citizenship by investment involves a significant amount of paperwork, including both forms and supporting documents. Having the support of an official government website and of a dedicated citizenship by investment unit to seek and obtain clarification was thus an influential factor in awarding points to a programme.

Extensive communication with advisers and legal experts is required where a jurisdiction mandates the purchase of real estate or other assets, and hefty paperwork

must also be submitted as evidence of that purchase. Therefore, countries with compulsory purchasing requisites were deemed to burden the application process.

The stability of each programme was also assessed, as applicants and service providers prize continuity throughout the application process.

Programmes with fewer demands placed on the applicant and with relatively straightforward procedures achieved higher scores for this pillar.

PILLAR 7: DUE DILIGENCE

The Due Diligence Pillar focuses on each nation's commitment to ensuring that their programme remains transparent and effective at evaluating potential candidates for citizenship. It is hence a measure of each programme's integrity.

Our analysis focused on the ability of governments to obtain information on and from applicants, such as by the performance of internal and external due diligence checks. Further indicators included police certificate requirements – including the number of nations from which a certificate must be provided – as well as requests for fingerprints or other biometric data.

Emphasis was placed on a country's ability to gather evidence on the applicant's source of funds, as this is a core step in preventing those profiting from or involved in the financing of illicit activity from obtaining citizenship.

Increasingly, strict anti-terrorism and anti-money laundering (AML) legislation has prompted some governments to prohibit persons of certain nationalities from applying for citizenship, or to restrict funds transferred from certain jurisdictions in order to ensure compliance with international sanctions. We sought to reflect these trends by including them among our indicators.

The greater a country's ability to perform background checks on applicants, the higher the score received. ●

Key findings: Caribbean programmes out in front

KEY FINDINGS

The CBI Index's key findings allow readers to either perform an overall review of the programmes, or evaluate the pillars individually

In providing both programme rankings and rankings by each of the seven pillars, the CBI Index affords readers the opportunity to either perform an overall review of the programmes, or complete a critical appraisal of the pillar that is of greatest consequence to them.

The following key findings emerge from the CBI Index rankings:

PILLAR 1: FREEDOM OF MOVEMENT

The countries that scored the highest in freedom of movement were the four European nations included in the CBI Index: Austria, Malta, Cyprus, and Bulgaria. Of these four, the highest-ranking were also members of the Schengen Area, which, for the most part, operates under a common visa policy.

The Caribbean followed Europe, having access to numerous key financial centres and having worked extensively to forge closer ties with other nations and to increase the number of destinations to which their citizens can travel visa-free. Antigua and Barbuda scored slightly higher than the other Caribbean islands.

Vanuatu ranked third-to-last, but significantly above Cambodia and Comoros, which received the lowest possible score under this section. Cambodia and Comoros received low scores both because of their poor overall ability to offer citizens visa-free travel, and because they lack the

adequate travel treaties to ensure their citizens can easily access today's prime business centres.

PILLAR 2: STANDARD OF LIVING

Standard of living saw Europe receive the highest scores, with Austria and Malta both topping the rankings. Austria obtained the best results in all sub-indicators with the exception of real GDP growth, where, together with Dominica and Saint Lucia, it was awarded the lowest mark. It is worth noting that Dominica's GDP was affected by the horrific Storm Erika, which set back the country's economic growth for 2016. It is no surprise that there are staggering growth rates seen from emerging markets such as Cambodia and Vanuatu.

The life expectancy sub-indicator revealed that, but for Austria, the longest lives can be enjoyed on the Mediterranean Sea. Close behind in second was Dominica – a lush island known for its abundant nature, spiritual atmosphere, and reliance on clean energy sources.

Expected years of schooling, another sub-indicator for a country's standard of living, saw Austria and Grenada obtain the top scores. Living in a country with more than 30 public and private universities, it should come as no shock that young Austrian men and women remain in education for long periods of time. Less well-known is Grenada's devotion to education, which has also led to it receiving international praise for its St George's University – a leading medical and veterinary school.

Overall for this pillar, Antigua and Barbuda, Dominica, and Grenada placed best out of the Caribbean – a region that, on the whole, ranked just below Europe. Island-nation Vanuatu equalled Saint Lucia and St Kitts and Nevis, while Cambodia and Comoros

Standard of living saw Europe receive the highest scores, with Austria and Malta both topping the rankings

received the lowest scores. Comoros was especially penalised by its results in sub-indicators such as life expectancy and gross national income (GNI). Cambodia was listed as the nation least dedicated to the freedom of its people, shedding light on its inability to uphold political and civil rights.

Perhaps unexpectedly, Cambodia was among the highest-ranking nations under the relative safety sub-indicator, which measures intentional homicide rates. The country scored the same as Europe and Vanuatu, the latter of which is known to be one of the least dangerous destinations in Oceania.

PILLAR 3: MINIMUM INVESTMENT OUTLAY

Offering the most affordable option for second citizenship, Comoros received its highest ranking in this pillar – which also saw Dominica and Saint Lucia top the list. Vanuatu and Grenada were close seconds, both offering citizenship to single applicants for less than or equal to \$200,000. Austria received the lowest ranking, offering citizenship for over forty times that amount.

Cyprus and Malta both obtained low scores, themselves extending citizenship for more than \$2m and \$1.2m respectively. Bulgaria ranked below Antigua and Barbuda and St

THE CBI INDEX									
SEVEN PILLARS								FINAL RESULTS	
Country	Freedom of Movement	Standard of Living	Min Inv Outlay	Mandatory Trv/Res	Ease of Processing	Citizenship Timeline	Due Diligence	TOTAL POINTS (70)	%
Antigua and Barbuda	8	7	8	7	10	7	8	55	78
Austria	10	9	1	8	4	2	4	38	54
Bulgaria	9	8	5	7	6	1	8	43	61
Cambodia	1	5	8	8	4	7	4	37	53
Comoros	1	5	10	9	6	9	6	46	66
Cyprus	9	8	2	7	7	8	6	47	67
Dominica	7	7	10	10	10	9	10	63	90
Grenada	7	7	9	10	10	9	8	60	85
Malta	10	9	3	2	8	3	10	45	64
Saint Lucia	6	6	10	10	9	7	5	53	76
St Kitts and Nevis	7	6	8	10	10	10	10	61	88
Vanuatu	6	6	9	9	9	10	4	53	76

Kitts and Nevis, but is the most affordable programme in Europe.

PILLAR 4: MANDATORY TRAVEL OR RESIDENCE

Dominica, Grenada, Saint Lucia, and St Kitts and Nevis achieved full scores under this pillar, as none of them require applicants to travel to or reside within their territory at any time prior to or after receiving citizenship. Indeed, these four jurisdictions rely on their stringent due diligence procedures to obviate any need to meet the applicant in person. It is important to mention, however, that these countries are famed for being welcoming, and applicants are invited to spend time visiting the countries whenever possible.

A high score was given to Comoros and Vanuatu, whose travel requirements can be waived by the payment of an additional fee. Austria, Cambodia, Antigua and Barbuda, Bulgaria, and Cyprus also received creditable scores.

Significantly below all other countries

Comoros, Dominica and Saint Lucia offer the most affordable option for second citizenship. Vanuatu and Grenada were close seconds

came Malta, whose more complex physical residence requirements placed it at the bottom of the scoring scale. Malta's 'genuine link' test only provides some flexibility to how an individual can demonstrate residence on the island.

PILLAR 5: CITIZENSHIP TIMELINE

St Kitts and Nevis, the sole nation to offer both a secure and an efficient timeframe for application processing, ranked best together with Vanuatu, which promises citizenship in around one month. High marks were awarded to Comoros, Dominica, and Grenada – whose average times were slightly less than those for Cyprus, Antigua and Barbuda, Cambodia, and Saint Lucia. In normal circumstances, these seven countries all offer processing times between more than one and less than five months.

Malta and Austria each received very low scores due to their protracted processing procedures, although it was Bulgaria that scored the lowest, as citizenship of this nation can only be

obtained within three to five years, depending on whether the applicant chooses the more expensive fast-track route.

PILLAR 6: EASE OF PROCESSING

The Caribbean was awarded the highest number of points for its ability to offer applicants streamlined and clear procedures to apply for citizenship. This reflects two important points regarding the region. Firstly, the requirements imposed on applicants in the Caribbean each follow the same model, and secondly, these nations have all committed to making their procedures transparent.

Vanuatu attained the same result as Saint Lucia, receiving equal points for all sub-indicators. Both performed weakly when evaluated for their ability to deliver on the promise of citizenship. Saint Lucia, for example, lost points following claims that all citizenships received under the December 2016

amendments to their Citizenship by Investment Programme (which came into force on January 1, 2017) would be reviewed and may be revoked should the applicant fail to make additional disclosures, payments, and filings.

Malta and Cyprus each scored below Vanuatu and Saint Lucia, dropping in the rankings because they leave no alternative to the applicant other than the purchase or rental of real estate – property transactions that inevitably come with hefty paperwork and enhanced due diligence on the property investment. While offering real estate investment under their citizenship programmes, the jurisdictions of the Caribbean do not make the purchase or rental of real estate mandatory.

With its requirement to acquire a bond portfolio, Bulgaria also failed to rank well. Lack of support from official government sources put Comoros, Austria, and Cambodia at a strong disadvantage. Enforcement of tests,

Malta scored highly for due diligence, but was penalised for its protracted processing procedures and insistence on the purchase of real estate

“The requirements imposed in the Caribbean each follow the same model and these nations have all committed to making their procedures transparent

previous business experience prerequisites, and compulsory interviews also factored in these weak results.

PILLAR 7: DUE DILIGENCE

Dominica, Malta, and St Kitts and Nevis scored equally to take first place, owing to their unique data collection and due diligence features. Generally, the Caribbean scored remarkably well – as did Bulgaria, thanks, among other things, to its thorough questioning of applicant information.

Comoros and Cyprus obtained average scores, while Austria, Cambodia, and Vanuatu each received the lowest scores attained under this pillar. Despite its high investment threshold, Austria falls short of many other nations with respect to the level of due diligence it performs on its applicants, especially when exploring the history and source of the applicant's funds.





FINAL SCORES: THE BEST PROGRAMMES

Considering the stability and longevity of the programmes in the Caribbean, it is no surprise that the Caribbean jurisdictions ranked in the CBI Index's top five positions, with Dominica – home to one of the longest-running citizenship by investment programmes, and known for its speedy procedures and affordable entry thresholds – attaining the highest ranking.

This echoes current trends in the economic citizenship market, which have seen Dominica's popularity grow in recent years. St Kitts and Nevis took second place due to its reputation for integrity and trust but scored slightly lower due to a higher investment threshold. Grenada, a relatively new programme relaunched in 2013, emerged from an unstable first year to become one of today's most interesting citizenship by investment options, particularly following the implementation of reforms in 2015.

Antigua and Barbuda and Saint Lucia, coming fourth and fifth respectively, completed the picture of a citizenship by investment arena dominated by the Caribbean.

Vanuatu, perhaps surprisingly for a

less-known programme, ranked fifth together with Saint Lucia, having obtained consistently high scores under all the pillars. Cyprus received the best score out of any European nation, distinguishing itself for its attractive travel and residence requirements. Comoros finished in eighth position, bolstered by its inexpensive investment requirements, rapid application turnarounds, and minimal travel and residence requirements – but damaged

Home to one of the longest-running citizenship by investment programmes, and known for its speedy procedures and affordable entry thresholds, Dominica attained the highest ranking

by its comparative inability to provide citizens with sufficient freedom of movement and a tolerable standard of living.

Malta, together with Austria, attained the highest scores in freedom of movement and standard of living, as well as achieved the highest score, together with Dominica and St Kitts and Nevis, for due diligence. Having received a commendable score for ease of processing, Malta was however among the lowest-scoring nations for all other pillars.

Bulgaria, the country to come 10th in the CBI Index, was especially harmed by the length of its citizenship routes and costly investment requirements. Austria is predictably one of today's least sought-after citizenship by investment programmes: enticing applicants with the promise of life in a prosperous European nation, but offering an abstruse programme known for its expensive and lengthy procedures.

Cambodia, the lowest-ranking programme, was consistently hovering at the end of the spectrum, except in the case of investment thresholds, travel and residence requirements, and citizenship timeline. ●

THE FINAL SCORES (%)	
COUNTRY	FINAL SCORE
1 Dominica	90
2 St Kitts and Nevis	88
3 Grenada	85
4 Antigua and Barbuda	78
5 Saint Lucia	76
6 Vanuatu	76
7 Cyprus	67
8 Comoros	66
9 Malta	64
10 Bulgaria	61
11 Austria	54
12 Cambodia	53

The seven pillars of the CBI Index

OVERALL RESULTS FROM THE CBI INDEX

- 90% Dominica
- 88% St Kitts and Nevis
- 85% Grenada
- 78% Antigua and Barbuda
- 76% Saint Lucia
- 76% Vanuatu
- 67% Cyprus
- 66% Comoros
- 64% Malta
- 61% Bulgaria
- 54% Austria
- 53% Cambodia



FREEDOM OF MOVEMENT

TOP 4 COUNTRIES



AUSTRIA, MALTA

Austria allows visa-free travel to more than 170 countries and 19 of the CBI Index's top international business centres

Malta allows visa-free travel to almost 170 countries and 19 of the CBI Index's top international business centres



CYPRUS, BULGARIA

Cyprus allows visa-free travel to almost 160 countries and 18 of the CBI Index's top international business centres

Bulgaria allows visa-free travel to almost 155 countries and 17 of the CBI Index's top international business centres



STANDARD OF LIVING

TOP 4 COUNTRIES



Austria, Malta



Bulgaria, Cyprus

81.6

LIFE EXPECTANCY

Life expectancy in Austria is 81.6 years, the highest of any country in the Index. Comoros is the lowest at 63.6 years



EDUCATION

Austria and Grenada score highest for expected years of schooling



MINIMUM INVESTMENT OUTLAY

TOP 3 COUNTRIES



Comoros, Dominica, Saint Lucia

\$45,000

LOWEST FEE

Comoros asks for a \$45,000 minimum contribution. Dominica and Saint Lucia require a \$100,000 contribution



MOST EXPENSIVE

Malta, Cyprus, and Austria are the most expensive citizenship by investment programmes



MANDATORY TRAVEL OR RESIDENCE

TOP 4 COUNTRIES



Dominica, Grenada, St Kitts and Nevis, Saint Lucia



RESIDENCE REQUIREMENTS

In Antigua and Barbuda, the physical residence requirement is 5 days in 5 years after obtaining citizenship



In Malta applicants must complete 12 months of residence



CITIZENSHIP TIMELINE

TOP 5 COUNTRIES



St Kitts and Nevis, Vanuatu



Comoros, Dominica, Grenada



FAST TRACK

St Kitts and Nevis is the only programme to offer a fixed Accelerated Application Process (AAP), ensuring applications are processed within 60 days



EASE OF PROCESSING

TOP 4 COUNTRIES



Antigua and Barbuda, Dominica, Grenada, St Kitts and Nevis



Cambodia is the only country that requires applicants to take a culture or history test



Austria and Comoros both require applicants to sit a mandatory interview



Cambodia carries out a language test



DUE DILIGENCE

TOP 3 COUNTRIES



Dominica, Malta, St Kitts and Nevis



The best ranked countries for due diligence have a system which displays robust external due diligence including on the ground checks, plus assistance from international law enforcement agencies



Fingerprinting or other biometric data collection was an important factor

Country profiles

COUNTRIES

A snapshot of the 12 countries which make up the CBI Index

ANTIGUA AND BARBUDA

Antigua and Barbuda are two islands of the Lesser Antilles in the eastern Caribbean Sea. United under one sovereign state, Antigua and Barbuda are harmoniously headed by one democratically elected parliament and a constitutional monarchy, responsible for the governance of the nation's population of around 91,000 citizens.

Antigua and Barbuda became independent from the UK in 1981, but aspects of British culture remain, such as the official language being English and cricket being the national sport.

Antigua, the largest of the two islands, is divided into six parishes and is home to the port-city of St John's, the country's capital. Barbuda is inched to the north of its sister island, and offers a more private Caribbean experience.

Antigua and Barbuda's GDP grew by 2.5 per cent in 2015, and is expected to moderate to 2 per cent in 2016. Tourism, investment banking, and manufacturing are the largest contributors to the nation's economy, with tourism accounting for almost 60 per cent of GDP. Despite the islands relying heavily on their natural environment to attract foreign visitors, particularly from the US, Antigua and Barbuda is first in the world for its per cent usage of fossil fuels to generate electric energy.

The financial sector is a growing segment of the economy, with a number of commercial banks having been set up on the islands, including foreign ones from Canada and Britain. Antigua and Barbuda's primary exports include boats, ships, and petroleum.

AUSTRIA

Austria is a cultural masterpiece of art, music, and literature, with notable names such as Gustav Klimt and Wolfgang Amadeus Mozart having called the country home.

A dominant central European power in the 19th century, Austria has today retained a population with a diverse ethnic heritage, including peoples from Germany, Turkey, and the Balkans. After World War II, Austria became a federal, democratic republic. Austria's government is seated in the capital, Vienna.

Austria has been a member of the European Union and of the Schengen Area since 1995, but it remains to some extent dependent on Germany, its closest trading partner and a country with which it shares a long history and a common language.

The services sector plays a major role in Austria's economy, having contributed more than 70 per cent of the nation's GDP in 2015. The World Trade Organisation (WTO) has ranked Austria as number 22 in the world for exports in commercial services, and number 29 in the world both as an exporter and importer of merchandise. Personal income tax cuts in 2016 have had a positive effect on the economy, expected to grow by 1.4 per cent by the end of the year.

Austria is a mountainous nation, a large portion of which is in the Alps. Skiing is a growing industry, with villages such as Hallstatt and Alpbach becoming increasingly popular. Locations such as the Baroque town of Salzburg, whose historical centre is a Unesco World Heritage Site, are also major magnets for visitors.

BULGARIA

Bulgaria is a country located within the Balkan Peninsula of south-east Europe, bordering Romania, Turkey, Greece, Macedonia, and Serbia.

With a rich history finding its roots in

Bulgaria is not yet a member of the eurozone, but the lev, Bulgaria's official currency, is pegged to the euro

the late seventh century and encompassing Byzantine and Ottoman rule, as well as Soviet control as a member of the Eastern Block, Bulgaria is now a parliamentary republic and formally part of the European Union. It is not yet a member of the eurozone, but the lev, Bulgaria's official currency, is pegged to the euro.

After almost a decade of decline and slow growth, fiscal discipline returned Bulgaria to stability. The country enjoyed a GDP growth rate of around 1.6 per cent in 2014 and 3.0 per cent in 2015, which the International Monetary Fund (IMF) expects to be maintained for 2016. Economic growth can also be traced to the government's increased efforts in tackling corruption.

Sofia, the capital city, is the most successful city in south-eastern Europe with respect to employment and real GDP, with output fuelled by around 39 per cent by the business and finance sectors.

Inflows to the capital and to the country are partly due to Bulgaria's gentle taxation regime, which affords persons and corporations the lowest income tax in the European Union.

The official language of Bulgaria is Bulgarian.

Bulgaria's population is estimated at almost 8m, composed primarily by native



Bulgarians, and Turkish and Roma minorities. In recent years however, the country has witnessed rapid demographic changes ascribed to the European Migrant Crisis.

CAMBODIA

The Kingdom of Cambodia is situated in south-east Asia, where it borders Thailand, Vietnam, and Laos. Cambodia is a country with a rich heritage, having been home to some of the oldest empires in the eastern world, and having been further shaped by its French colonial past.

Cambodia's population of approximately 15m is governed by a constitutional monarch and a democratic parliament, that has however been largely dominated by the Cambodian People's Party. The country's official language is Khmer, although exposure to international trade has resulted in English becoming a familiar language to many.

Phnom Penh is the nation's capital and the centrepiece of the country's infrastructure, culture, and cuisine. Rural Cambodia is responsible for much of the country's manufacturing and exports, with the Asian Development Bank noting that garment and footwear exports increased by 9.4 per cent in the first six months of

2016. Farming is still a learned trade, passed from generation to generation, which today contributes to around 30 per cent of GDP. Typical harvested produce includes rice, maize and soya beans. Overall, Cambodia has been demonstrating momentous growth for over a decade, with the World Bank anticipating a 6.9 per cent growth for 2016.

The poverty rate in Cambodia varies from urban centres to rural areas, and while wealth has increased in the past years, the United Nations Development Programme estimated that 13.5 per cent of the country's population lived in poverty in 2014. Deforestation is also a concern, with a 2015 Forest Trends report highlighting that 14 per cent of Cambodia had been earmarked for land conversion.

COMOROS

The Union of the Comoros is a cluster of islands 875 kilometres north-west of Madagascar off the African east coast.

One of the smallest but most densely populated countries in Africa, the Comoros is inhabited by approximately 788,000 people, with around 40 per cent of the population aged under 14. The many islands of the Comoros are home to a diverse ethnic population with African,

Cambodia has been demonstrating momentous growth for more than a decade

Arabic, and French ancestral ties.

The official languages of the Comoros are Comorian, Arabic, and French, allowing for wide participation in the country's economy and infrastructure. The capital city, Moroni, is in the island of Grand Comore, also known as N'gazidja, and is shrouded in Arabic and early Islamic influences.

With temperatures being relatively high throughout the year, the Comoros could attract year-round tourism, but the industry is still in its early stages. Ecotourism is a popular experience in the Comorian island of Mohéli, known for its untouched scenery and wildlife.

A developing nation, the Comoros is heavily dependent on fishing and agriculture. In 2013, around 71.5 per cent of its land was being put to agricultural use, with key export products including vanilla and ylang-ylang. The International Monetary Fund (IMF) forecast a real GDP growth rate of 2.2 per cent for 2016.

The Comoros has struggled with maintaining a stable government since its independence from France in 1975. One of the main Comoro Islands, Mayotte, voted to remain part of France, but its status as a French insular department is contested by the Union of the Comoros.

CYPRUS

Cyprus is the third largest island of the Mediterranean Sea, and is only a short boat ride away from both Greece and the Middle Eastern nations of Turkey, Syria, Lebanon, Israel and Egypt. Although a united geographical entity, Cyprus is unofficially partitioned into two: the Republic of Cyprus and the Turkish Republic of Northern Cyprus. The latter, the product of Turkish occupation in 1974, is only recognised by Turkey.

The population of Cyprus is estimated to be around 1,165,000, with majority ethnic groups being Greek-Cypriot and Turkish-Cypriot. Recent migration trends have also seen large numbers of foreign communities residing on the island, including many Greek, British, Romanian, Bulgarian, and Filipino individuals.

Cyprus has a strong economy, characterised by little unemployment. Its low tax and inflation rates have made Cyprus a desired destination for offshore companies and the relocation of assets, thus attracting foreign investment. The

International Monetary Fund (IMF) has estimated a real GDP growth rate of 2.8 per cent for 2016, but has forecasted a reduction in growth to 2.2 per cent for 2017.

Art, culture, and archaeology play a significant part in shaping Cypriot identity, and draw worldwide visitors. The Kourion Archaeological Area and the Kato Paphos Archaeological Park, both Unesco World Heritage Sites, are just two of the many reminders of the splendour of ancient Cyprus. Tourism made a total contribution of 21.3 per cent to the country's GDP in 2014.

DOMINICA

Situated between Guadeloupe and Martinique, the Commonwealth of Dominica is a single-island nation in the Caribbean Sea.

Dominica is one of the most forested countries in the world by percentage of land area, and has thereby earned the epithet 'Nature Island of the Caribbean'. The environment is of key importance to the government, which is currently heavily

Grenada, known as the 'Island of Spice', has a population of approximately 107,000

“Dominica is one of the most forested countries in the world by percentage of land area, and has earned the epithet 'Nature Island of the Caribbean'”

investing in eco-tourism and clean energy as a means of championing and preserving the island's natural habitat. A 2016 study by the Economic Commission for Latin America and the Caribbean (ECLAC) placed Dominica as the Caribbean Community (CARICOM) nation with the highest percentage use of renewable energy, thanks to its extensive use of wind and hydropower.

The capital of Dominica is Roseau, a hub for the provision of financial services – particularly banking. A port city on the south-western coast of the island, Roseau is also at the heart of the country's international trade.

Dominica is moving to a more service-based economy, with hotels and restaurants adding significant value to the island's GDP. Nevertheless, agriculture – historically Dominica's primary source of income – still brings significant revenue. This is reflected in the roughly 33 per cent of the island's landmass still being put to agricultural use, and being used to cultivate produce such as bananas, bay, and cocoa.

The International Monetary Fund (IMF) projects a 2.5 per cent growth rate for Dominica in 2016.

Dominica's official language is English and its currency is the East Caribbean





dollar, a stable currency pegged to the US dollar, and used by seven other Caribbean nations.

GRENADA

Grenada is a tri-island country in the south-eastern Caribbean Sea comprising of Grenada, Carriacou, and Petite Martinique. Its approximately 107,000 citizens speak English, and creole French and English are popular unofficial languages.

Known as the 'Island of Spice', Grenada is an active producer of many exotic spices including cinnamon, cloves, mace, and nutmeg. Tourism and travel are also key to the economy, accounting for 25.5 per cent of Grenada's GDP in 2015 – a value that is expected to rise to 31.5 per cent in 2026.

Overall, the World Bank anticipates an annual GDP growth of 3 per cent for Grenada by the end of 2016, the fourth-highest growth in the Eastern Caribbean Currency Union. The Caribbean Community (CARICOM) has also highlighted Grenada's prominence as one of the highest exporters of telecommunications, computer, and information services of the Organisation of Eastern Caribbean States.

St George's University, known for its medical curriculum, is a benefactor of the

country's economy and is the largest private employer on the island of Grenada. It attracts renowned academics and a diverse student body.

Grenada's colonial past has shaped its culture – a blend of African, French, English, and Spanish influences – and is infused into the wide selection of cuisines, traditional attires, and festivals taking place throughout the year. Festivals are sources of allurements for the international community, with the Annual Grenada Sailing Festival and Grenada's Spice Mas Festival being prime examples.

MALTA

Malta is an archipelago located in the central Mediterranean Sea and composed of three major islands: Malta, Gozo, and Comino. Maltese architecture reflects the many cultures that, throughout history, called the country home, with buildings drawing inspiration from differing styles ranging from Italian and French Baroque, to the British Neogothic and Victorian styles.

The country's official languages are Maltese and English, contributing to Malta's international character. Despite being one of Europe's least populated nations, with around 415,000 citizens and only 300 km² at its disposal, it is also one of

Saint Lucia's economy is driven by financial services and tourism

the most densely inhabited.

Valletta is the capital of Malta and is often frequented as a political space for European meetings and conferences. It hosted, for example, the 2015 Valletta Summit on Migration, where European and African heads of government met to discuss the European migrant crisis. The city is recognised as a Unesco World Heritage Site for its concentration of historical sites, particularly dating to the period in which Malta was governed by the Order of St John – also known as the Knights Hospitaller.

A European Union Member since 2004, and a member of the eurozone since 2008, Malta has a healthy economy. The International Monetary Fund (IMF) forecasts Malta's real GDP growth rate as 4.1 per cent for 2016. Travel and tourism made a total contribution of 27.7 per cent of GDP in 2015, expected to grow to 33.8 per cent by 2026. Other significant sectors of Malta's economy include wholesale and retail trade, especially by naval transport, and hospitality services.

SAINT LUCIA

Saint Lucia is an island nation situated in the Caribbean Sea. Part of the Windward Islands, it is known for its majestic Piton mountains, a Unesco World Heritage Site



encompassing vast numbers of rare plant and animal species, including endemic birds. Saint Lucia's aquatic flora and fauna, as well as its bountiful rainforests, have been pivotal to attracting tourism to the island.

A former French and British colony, Saint Lucia has adopted English as its official language, although many natives speak creole French. The interplay between French and British influences is also reflected in the nation's legal system: a blend of Common and Civil Law.

Saint Lucia's economy is driven by financial services and tourism. Travel and tourism contributed to approximately 39.5 per cent of the nation's GDP in 2014, a figure that is expected to rise to 50.2 per cent in 2025. Around 44 per cent of employment is generated by Saint Lucia's tourism industry.

Saint Lucia is part of the Organisation of Eastern Caribbean States (OECS), an intergovernmental entity headquartered in Saint Lucia and tasked with promoting the economic and social advancement of its members. A significant contributor to the OECS, Saint Lucia boasted the Organisation's fourth highest agricultural GDP for 2015. The International Monetary Fund (IMF) predicts a total real GDP growth rate of 1.5 per cent for Saint Lucia in 2016, rising to 1.9 per cent in 2017.

Saint Lucia holds a population of around 185,000, with Castries, its capital city, being the most changing and highly populated demographical space on the island.

ST KITTS AND NEVIS

The Federation of Saint Christopher and Nevis, commonly known as St Kitts and

Nevis, is a twin-island country of the Caribbean. Formed by volcanic activity, the islands have both white and black sand beaches, and are dominated by mountainous areas blanketed by vegetation.

Boasting one of the most successful economies in the Caribbean, and a real GDP growth rate of 5 per cent for 2015 and 3.5 per cent for 2016, the Federation can rival the more established economies of the West. The commercial centre of St Kitts and Nevis is Basseterre, the country's capital city. Basseterre is home to a dynamic financial services industry, and hosts both the Eastern Caribbean Central Bank and the Eastern Caribbean Securities Exchange.

Construction and tourism are largely responsible for St Kitts and Nevis' robust economic performance. In 2015, the Eastern Caribbean Central Bank (ECCB) reported more than 1m visitors to the island – over 200,000 more visits than in the previous year. New luxury resorts impacted the rising number of tourists, providing additional rooms and catering to the demands of high-end tourism.

Sustainable development and ecology are also national concerns of the islands, with Nevis on the route to achieving 100 per cent green energy use, scheduled for the end of 2017. National parks, plantations, botanical gardens and eco-friendly resorts also receive government support.

Nevis is also renowned for its attractive offshore financial services, particularly with respect to company incorporation and trust set up. The

Tourism is on the increase in Vanuatu

industry is highly regulated to ensure compliance with international anti-money laundering best practices.

VANUATU

The Republic of Vanuatu is an archipelago of around 80 islands sitting remotely in the South Pacific Ocean. Vanuatu has a population of approximately 280,000, with the largest demographic group being the native Melanesians. Around 74,000 individuals live in rural areas.

The official language of Vanuatu is Bislama – a fusion of English and local languages – although French, English, and other dialects are also widely spoken.

Vanuatu is divided into six provinces, each of which have elected parliaments responsible for the formulation and administration of local laws. Vanuatu also has a central, democratically elected government, but community authorities such as village chiefs continue to play an important part in politics.

The capital of Vanuatu is Port Vila, the largest city within the Vanuatu islands. With more than 80 per cent of exports leaving Vanuatu from Port Vila, the capital is an economic lifeline for the country.

Traditional practices such as farming and fishing bring much economic revenue to the islands. In 2014, agriculture and forestry accounted for 74 per cent of Vanuatu's total exports and agriculture alone added a value of 28.2 per cent to the national GDP.

With tourism on the increase, Vanuatu is becoming better known to the outside world. In the second quarter of 2016, it is estimated that 71,639 visitors arrived in Vanuatu, a 50 per cent increase from 2015. Vanuatu has also increased its reputation in the financial services, with many stakeholders attracted to the benefits of the nation's low tax regime. ●

Programme profiles

PROGRAMMES

A closer look at the 12 citizenship by investment programmes which make up the CBI Index

THE ANTIGUA AND BARBUDA CITIZENSHIP BY INVESTMENT PROGRAMME

The Antigua and Barbuda Citizenship by Investment Programme is a recent addition to the sphere of economic citizenship, having been established by the Antigua and Barbuda Citizenship by Investment Act, 2013. Antigua and Barbuda offers three investment alternatives for successful applicants.

The first alternative allows applicants to make a minimum contribution of \$200,000 to the National Development Fund (NDF), a not-for-profit organisation created with the purpose of running both public and private projects as well as charitable initiatives such as improving access to healthcare and education.

The second alternative requires the applicant to make an investment of \$400,000 or more into one of the government's approved real estate projects. Such developments include leasehold schemes, hotels, and villas that add value to the nation's tourism sector.

The last alternative entails an investment of \$1,500,000 into an eligible, government-approved, business project. Applicants can apply as joint investors so long as each applicant makes a \$400,000 investment into a project estimated to be worth at least \$5,000,000.

Government and due diligence fees apply under each of the three alternatives to citizenship, with the former starting at \$50,000 for a single applicant.

The programme's application process takes approximately three months from the date of submission to the Citizenship by Investment Unit (CIU), the

government body responsible for reviewing all applications under the programme. Due diligence procedures are strict, but a number of nationalities are outright excluded from the application process.

Antigua and Barbuda requires applicants to travel to the nation or to an embassy or consulate to sign an oath of allegiance. Furthermore, once awarded, citizenship is conditional on the applicant spending five days on Antigua or Barbadian soil within five years of obtaining citizenship.

Antigua and Barbuda offers citizens close ties to the Americas, including visa-free travel to Canada. Citizenship also comes with access to over 130 countries and territories worldwide, as well as life in a tolerant nation that accepts dual nationality.

CITIZENSHIP BY INVESTMENT IN AUSTRIA

The particulars of Austria's citizenship by investment procedures are not codified in the laws of the nation. Rather, the scheme draws broad legitimacy from Article 10, Paragraph 6 of the 1985 Nationality Act, which gives leave to the federal government to grant citizenship where an individual displays actual or expected outstanding achievements. Failure to fully codify the scheme has made it one of the least transparent processes in the economic citizenship arena.

The outstanding achievement underlined in Austria's laws translates into a number of accepted avenues for investment, although it has been reported that a monetary donation of €8-10m (\$8.9-11.2m) was sufficient to trigger the provision.

Exclusive and limited to those who can guarantee a positive attitude towards Austria and its government, the scheme has operated intermittently, and only rarely are aspiring applicants successful. The process involves significant

“Once awarded, citizenship is conditional on the applicant spending five days on Antigua or Barbadian soil within five years of obtaining citizenship

communication with various government representatives, and usually takes about two years to complete. Under Article 10(a), knowledge of the German language, with due regard for the personal circumstances of the applicant, is required for the grant of nationality. However, this has at times been waived under the scheme.

Although Austria generally disallows dual nationality, applicants who apply to naturalise under Article 10, Paragraph 6 are permitted to retain their original citizenship, bringing the scheme in line with those of other jurisdictions offering economic citizenship. Other benefits of Austrian citizenship include visa-free access to all European Union member states, the United States, and Canada. A total of more than 170 nations have implemented visa waiver programmes for Austrian citizens.

THE BULGARIAN IMMIGRANT INVESTOR PROGRAMME

The Bulgarian Immigrant Investor Programme (BGIIP), was created in 2009 with an amendment to the Foreigners in the Republic of Bulgaria Act. Designed as

a quick route to citizenship via a period of nominal permanent residence in Bulgaria, the programme does not require the investor to physically spend time in Bulgaria while waiting for citizenship to be issued. This feature makes Bulgaria one of a handful of European citizenship programmes where prior physical residence in the nation is not compulsory.

There are two investment options under the programme, the first leading to citizenship in five years, with the latter doing so in three years. Under the first option, the applicant must make a BGN1m (\$573,000) guaranteed investment in Government bonds, while under the second option the applicant must make a BGN2m investment in government bonds or in a Bulgarian company. Either investment must be retained for a period of five years, after which time it is returned to the investor without any interest that may have accrued.

Applications under the programme are first submitted to a local Bulgarian consulate, which redirects the application to the Ministry of Foreign Affairs and issues a first-stage visa for the applicant to enter Bulgaria and file for permanent residency. Thereafter, processing is conducted by the Ministry of Foreign Affairs.

The programme is only available to non-EU nationals, who must make two formal trips to Bulgaria; once to file for permanent residency, and once to register permanent residency and receive the relevant identity documents. Permanent residence may be expected within six to nine months of submission, while citizenship rests on the option selected by the applicant.

The benefits of Bulgarian citizenship include free movement rights throughout all the member states of the European Union, and visa-free access to more than 150 countries and territories. Bulgaria has yet to join the Schengen Area, although it is taking steps towards membership. Dual

citizenship is allowed without restrictions.

CITIZENSHIP BY INVESTMENT IN CAMBODIA

As early as 1996, provisions were made in Cambodia's Law on Nationality to allow foreigners to naturalise following an investment in the kingdom. These were further outlined, in their most recent form, by Sub-decree 287 of 2013. As a member of the Association of Southeast Asian Nations (ASEAN), and the only nation to offer a direct citizenship programme in Asia, Cambodia provides a gateway for investors looking to bring capital to the continent while also obtaining citizenship rights.

Cambodia currently affords citizenship to those who invest 1.25 billion Cambodian riels (around \$311,900) into the nation. The investment must be approved either by the Cambodian Development Council, or by the Royal Government. Citizenship is also available to those who donate 1 billion Cambodian riels (approximately \$249,500) for the restoration and rebuilding of Cambodia's economy.

Knowledge of Khmer history and language is required, and applicants must travel to Cambodia to obtain good behaviour, police, and health certificates, as well as to sign the relevant citizenship oath. Applicants who choose the investment option must register a residence in Cambodia at the time of the application, although they need not live there. This requirement is waived for applicants who choose to donate.

Applications are reviewed by the Ministry of the Interior, although citizenship may only be granted by the king by Royal Decree. The entire process can take between three and six months to complete.

Citizenship of Cambodia brings visa-free travel rights to around 50 countries and territories, the majority of which are located in south-east Asia. As a member of Asean, Cambodia also affords

“Applicants who choose the investment option must register a residence in Cambodia at the time of the application, although they need not live there

opportunities for facilitated trade and mobility among member states, including the right to work and live abroad for certain professionals. For those wishing to retain their citizenship of birth, Cambodia allows dual citizenship. Finally, as a citizen of Cambodia, the applicant may purchase real estate in the country – a privilege exclusive to Cambodians.

THE COMOROS ECONOMIC INVESTMENT PROGRAMME

The Comoros passed its first Law on Economic Citizenship on 27 November 2008, having found authority to do so in Articles 5 and 19 of the Constitution of 23 December 2001. The Economic Investment Programme was devised as a means of generating income for the nation, with the Gulf States as key target markets.

Shortly after its inception, the Comoros announced that more than \$200m would be invested through the programme in return for the naturalisation of 4,000 families, each between six and eight family members. The families were all composed



of Bedoon, stateless people who generally do not enjoy the same rights as those of the nationals of the countries they reside in, primarily the United Arab Emirates and Kuwait.

The programme has since sought to entice individual investors, with minimum required investments set each financial year by the relevant Finance Act. Furthermore, each naturalisation requires the payment of 1,000,000 Comorian francs (around \$2,000) to the national Treasury.

The body responsible for processing all applications under the Comoros Economic Investment Programme is the Independent National Committee, which aims to process each application within a timeframe of 45 to 80 days. Economic citizenship is granted by a decree of the President of the Republic issued by the Council of Ministers.

The programme does not require applicants to reside in the archipelago, and is restricted to those foreigners whose habitual residence is outside Comorian territory. Unlike for other programmes, there is a requirement that the applicant not support principles contrary to Sunni Islam, the nation's dominant religion. The applicant must also attend an interview and provide biometric data before an

enrolment officer in Dubai, or anywhere in the world provided the applicant pays for the officer to travel.

The Comoros Programme for citizenship offers rewarding personal benefits, such as travel to more than 45 countries and territories, many of which are located in Africa and south-east Asia. The Union of the Comoros respects the applicants' personal choice to retain their citizenship of origin by allowing dual nationality once Comorian citizenship is obtained. However, as a citizen who was naturalised through an investment in the Comoros, an applicant will not have the right to vote, become part of the country's judicial branch, or join the army.

SCHEME FOR NATURALISATION OF INVESTORS IN CYPRUS BY EXCEPTION

Grounded in Section 111 of the Civil Registry Laws of 2002-2013, the Scheme for Naturalisation of Investors in Cyprus by Exception had undergone several alterations. In its original form, it required a €15m (\$16.8m) investment – an exorbitant price that discouraged applicant participation. The current scheme was unveiled in 2014, and last amended in late 2016 by the nation's Council of Ministers.

Applicants under the Cypriot scheme

The first families 4,000 families naturalised under the Comoros programme were all composed of Bedoon stateless people who generally do not enjoy the same rights as those of the nationals of the countries they reside in, primarily the United Arab Emirates and Kuwait

may apply either as individuals or through one or more companies, so long as they complete all required investments at most three years prior to applying, and preserve those investments for a further three years following citizenship.

All applicants for citizenship must purchase real estate valued at €500,000, and declare that real estate as their permanent residence. They then have a choice of three options in which they must invest €2m.

The first option involves the purchase of or participation into a Cypriot company resulting in the creation of five jobs for citizens of Cyprus or of the European Union who legally resided on the island for five years prior to the investment.

The second option entails transferring €2m in alternative investment funds (AIFs) established and investing in Cyprus. The AIFs must both be licensed and supervised by the Cyprus Securities and Exchange Commission (CySec).

The third option involves purchasing buildings, land under development, or infrastructure valued at €2m, whether these be residential or commercial. Applicants who select residential real estate under this option however need not spend the additional €500,000 to establish a permanent residence in Cyprus.

Combination investments – so long as they amount to €2m – are allowed, and applicants who select to diversify their investment may also purchase government bonds for a maximum value of €500,000.

Applications for citizenship under the scheme are processed by the Ministry of Interior and are further subject to application and processing fees. The applicant must be a resident permit holder at the time of application, otherwise an application for residency may be lodged at the same time as the application for naturalisation. The application process takes a minimum of three months and involves no language test or interview requirements.

Benefits for acquiring citizenship in Cyprus includes freedom of movement and residence in any other European Union member state, although it does not occasion membership of the Schengen Area. Citizens may avail themselves of visa-free travel to around 160 countries.

THE DOMINICA CITIZENSHIP BY INVESTMENT PROGRAMME

Dominica's Citizenship by Investment Programme was launched in 1993 and is known for being one of the world's most efficient and transparent citizenship options. It plays a major role in promoting social and environmental causes, particularly sustainable development.

The programme was recently reshaped by the 2014 Citizenship by Investment Regulations to include diverse investment options and even stricter regulation processes, enabling stringent review of applicants.

The programme currently offers two investment opportunities: a one-time contribution into the Economic

Diversification Fund (EDF) or an investment in government-approved real estate. Funds transferred to the EDF have been instrumental in Dominica's national development, particularly by the reconstruction of key infrastructure and public buildings, as well as by the financing of Dominica's offshore and agricultural sectors.

The EDF option requires a contribution of \$100,000 for a single applicant – a value that increases as family members are added to an application.

The real estate option requires an investment amounting to at least \$200,000, to which a single applicant must add a \$50,000 real estate government fee. The real estate must be held for a period of three years, increased to five years if the purchaser is also an applicant for citizenship by investment. Other applicable fees include due diligence and processing fees.

The Citizenship by Investment Unit (CBIU) is the government authority tasked with managing and processing

Benefits for acquiring citizenship in Cyprus includes freedom of movement and residence in any other European Union member state

“Dominica’s programme is one of the most accessible in the world as it does not does not impose any restriction based on the applicant’s nationality

applications for citizenship under the programme. To qualify for Dominica's Citizenship by Investment Programme, applicants must have a clean criminal record and prove they are of good character, as well as pass a series of due diligence checks.

By regulation, the CBIU must respond to an application within three months of its submission. Application processing is however often much faster, taking between 45 and 60 days. There are no interview or travel requirements.

Applicants under the programme are also exempt from residency requirements, whether before or after attaining citizenship. Applicants also need not learn English, or show a history of education or business experience. The programme is one of the most accessible in the world in that it does not impose any restriction based on the applicant's nationality.

Benefits of citizenship of Dominica include visa-free travel to more than 120 foreign destinations, dual citizenship, and the opportunity to experience a different lifestyle in one of the most eco-friendly destinations in the world.



THE GRENADA CITIZENSHIP BY INVESTMENT PROGRAMME

Created in 2013 by the Grenada Citizenship by Investment Act, Grenada's Citizenship by Investment Programme supports the nation's renewable and sustainable development initiatives, and stimulates foreign investment to promote tourism, construction, agriculture, and manufacturing. The Grenada Programme has gained recognition and trust thanks to its due diligence processes.

The Grenada Citizenship by Investment Programme offers applicants two investment options. The first option includes a contribution of \$200,000 into the National Transformation Fund (NTF), a government institution responsible for locating and financing alternative, economically-stimulating investments for the country. The second option allows the applicant to purchase a \$350,000 government-approved real estate project, which the applicant must hold for at least three years.

Applicants under either option are responsible for paying associated application, processing, and due diligence fees. An application by up to four family members requires an additional US\$50,000 Government fee where the real estate option is selected.

The application process, showcasing an administration timeline of 60 business days, is also one of the most seamless, requiring no interview, no business experience, and no language requirement. Travel to Grenada or residence therein are also not necessary under the programme. Every application is vetted by the Citizenship by Investment Committee (CBIC), and must go through a series of external due diligence checks before it is readied for final review and for approval by cabinet.

Grenadian citizenship can benefit successful applicants by providing them with options for global mobility, particularly to China and the US, the latter of which



allows Grenadian citizens to apply for a renewable visa through its E-2 Programme. Dual nationality is allowed.

THE MALTA INDIVIDUAL INVESTOR PROGRAMME

As the European Commission's first recognised citizenship by investment programme, Malta's Individual Investor Programme is a strong contender on the European scene. Moulded in its current form by Legal Notice 47 of 2014, the programme is capped at 1,800 successful applicants.

The Individual Investor Programme has a single three-tier investment strategy for applicants interested in obtaining citizenship of the island.

First, the applicant must make a €650,000 (\$728,000) non-refundable contribution to the Malta National Development and Social Fund, a separate legal entity administered by a board of governors charged with using the funds to advance education, research, innovation, social purposes, justice and the rule of law, employment initiatives, the environment, and public health.

Applicants can then either purchase real estate at a minimum value of €350,000 or rent property at a cost of at

Malta's scheme was the European Commission's first recognised citizenship by investment programme

least €16,000 per annum. Whether the applicant chooses to purchase or rent, the real estate must be maintained for a period of five years, during which time it may not be let or sublet.

To complete the investment portfolio, the applicant must also acquire government bonds, stocks, or special purpose vehicles for a value of €150,000, to be retained for a period of five years.

As well as meeting a qualifying contribution for investment, applicants must also pay due diligence fees, used to assess their suitability for citizenship. They must also purchase global health insurance, to be prolonged indefinitely.

Applications for citizenship of Malta are processed by Identity Malta, a procedure that takes at least one year as applicants must show 12 months' residence on the island. A residence card is issued to enable applicants to live on the island prior to gaining citizenship.

Maltese citizenship does not come at the price of one's previous nationality, as dual nationality was allowed in 2000. It brings a number of benefits including the right to live and work in the European Union, and visa-free travel to the Schengen Area and a total of more than 165 countries and territories.

THE SAINT LUCIA CITIZENSHIP BY INVESTMENT PROGRAMME

The newest economic citizenship programme to emerge on the world stage, inaugurated in January 2016, is Saint Lucia's Citizenship by Investment Programme.

Saint Lucia has four investment options available to applicants preferring to invest under this Programme. The fastest option is a contribution to Saint Lucia's National Economic Fund (NEF). Moneys deposited into the NEF are funnelled into progressive local development projects, selected by the minister of finance with the approval of parliament. Originally set at a \$200,000 contribution, on January 1, 2017, the government reduced the entry threshold to \$100,000 – causing some local criticism and speculation that the programme was not sufficiently popular.

The second option under the programme asks applicants to make a minimum investment of \$300,000 into a government-approved real estate project. Real estate projects are expected to be boutique properties or fractions of branded

hotels and resorts, and must be maintained by the applicant for a period of five years.

Applicants may also purchase government bonds worth at least \$500,000. The bonds must be held for five years, and may not return a rate of interest to the applicant.

Under the final option of the programme, applicants can make a minimum investment of \$3,500,000 into a government-approved enterprise project, which may be brought to the attention of the Government by the applicant. The project may range from the building of a port to the establishment of a university, and must result in the creation of at least three permanent jobs. Applicants may partner with others to launch a joint venture, so long as a total minimum investment of \$6m is made, with each investor contributing no less than \$1m. At least six permanent jobs must be generated as a result of the joint venture.

Due diligence and processing fees apply under all options, while administration fees apply only to the real

Saint Lucia's is the newest economic citizenship programme to emerge on the world stage

estate, government bond, and enterprise project options. The latter start at \$50,000 for a single applicant.

Applications are processed by the Citizenship by Investment Unit (CIU), with the first year of the programme's existence seeing applications returned to applicants with an approval or denial within three months of submission. There is no need for applicants to learn any language, or to prove any business or education skill. Further, applicants are not required to attend an interview.

Citizenship of Saint Lucia offers a viable alternative for anyone seeking a relaxing lifestyle and global access to around 125 countries and territories. Saint Lucia has no restrictions on holding dual nationality.

THE ST KITTS AND NEVIS CITIZENSHIP BY INVESTMENT PROGRAMME

As home to the world's longest-standing Citizenship by Investment Programme, the Federation of St Kitts and Nevis has a 33 year-long history of leading the field of economic citizenship. Today, the programme has earned a reputation as the 'platinum standard' of citizenship by investment, offering applicants the opportunity to partake in one of the most diversified economies of the Caribbean.

To qualify for citizenship under this programme, applicants are invited to invest in either the Sugar Industry Diversification Foundation (SIDF) or pre-authorised real estate. SIDF applicants can contribute a non-refundable sum of \$250,000 – a minimum threshold that increases as more individuals are included in an application. Contributions are redirected to projects that facilitate the country's transition from an economy specialised in sugar production, to one that offers a variety of services and produce.

As an alternative investment option, applicants can purchase real estate worth at least \$400,000. A \$50,000 real estate government fee is applicable for single





applicants. The property must be retained for a minimum of five years. Due diligence fees apply under both options.

The Citizenship by Investment Unit (CIU) is responsible for processing all applications for citizenship by investment. Processing of each application can take between 45 days and three months, and a VIP Accelerated Option, available at a premium fee, allows applicants to receive their passport within 60 days of date of submitting their application. The process entails neither an interview, nor a language, education, or business requirement. Travel to the twin-islands is not obligatory, and no minimum residence stays apply either prior to or after citizenship is obtained.

Benefits of the St Kitts and Nevis Citizenship by Investment Programme include visa-free travel to more than 130 countries and territories, the option to maintain multiple nationalities, and the opportunity to become a citizen of one of today's fastest growing nations.

THE VANUATU ECONOMIC REHABILITATION PROGRAMME

Introduced by Honorary Citizenship (Vanuatu Economic Rehabilitation Program[me]) Regulation Order No. 34 of 2015, the Vanuatu Economic Rehabilitation Programme (VERP) was

launched as a means of reinvigorating the South Pacific island nation's economy following the passage of Cyclone Pam on 15 March 2015, which resulted in severe infrastructural damage.

There is a single route available under the VERP: a contribution to the Vanuatu Government VERP Account in the amount of \$130,000, which includes a family of four with a main applicant, a spouse, and two children under the age of 18. To this sum, applicants must add citizenship, passport, Vanuatu Investment Promotion Authority (VIPA), and due diligence fees.

Offering one of the quickest processing times, at only one month following receipt of all documentation, the VERP has no language, residence, or minimum education requirements. To take the citizenship oath and obtain finalised citizenship papers, the applicant may choose between travelling to Vanuatu, waiting until the relevant Commissioner for Oaths visits the nearest Diplomatic Mission, or paying a fee to cover the cost of the Commissioner traveling to the applicant's place of residence.

Applications are received by the Citizenship Commission and due diligence checks are performed by the Financial Intelligence Unit working closely with

St Kitts and Nevis is one of the world's fastest-growing nations

In Vanuatu, the final grant of citizenship rests in the hands of the president, who acts upon the advice of the prime minister

Interpol. The final grant of citizenship rests in the hands of the president, who acts upon the advice of the prime minister.

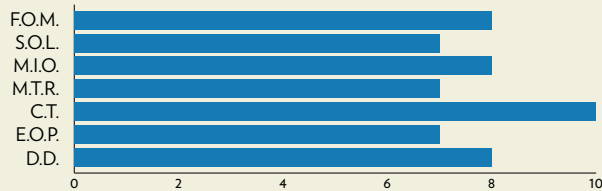
Although Vanuatu recognises dual citizenship as of 2013, citizens who are dual nationals may not vote, hold or serve in any public office, or be politically involved in Vanuatu – such as by affiliating with a political party or funding activity that may cause political instability. Any citizen of Vanuatu may however benefit from visa-free travel rights to around 110 territories, including, as of 28 May 2015, the Schengen Area. ●

Country snapshot

ANTIGUA AND BARBUDA



CAPITAL CITY
St John's
POPULATION (2016)*
93,000
OFFICIAL LANGUAGE
English
CURRENCY
Eastern Caribbean dollar

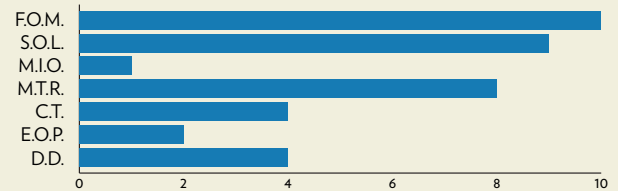


Final score 78%

AUSTRIA



CAPITAL CITY
Vienna
POPULATION (2016)*
8,661,000
OFFICIAL LANGUAGE
German
CURRENCY
Euro

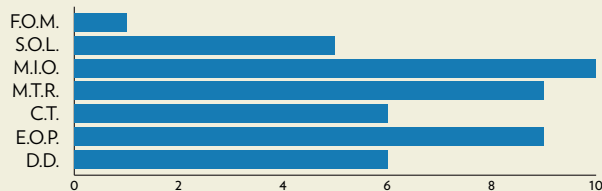


Final score 54%

COMOROS



CAPITAL CITY
Moroni
POPULATION (2016)*
807,000
OFFICIAL LANGUAGE
French, Comorian, Arabic
CURRENCY
Comorian franc

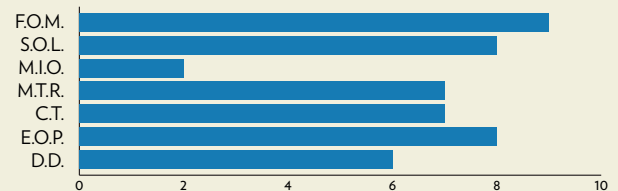


Final score 66%

CYPRUS

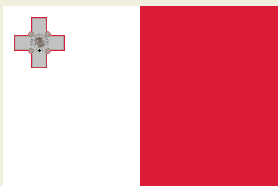


CAPITAL CITY
Nicosia
POPULATION (2016)*
1,177,000
OFFICIAL LANGUAGE
Greek, Turkish
CURRENCY
Euro, Cypriot pound

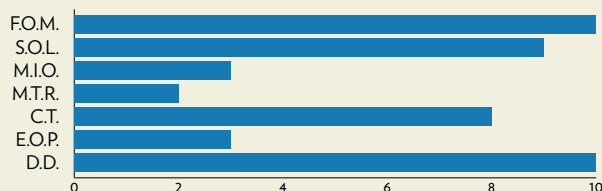


Final score 67%

MALTA



CAPITAL CITY
Valletta
POPULATION (2016)*
433,000
OFFICIAL LANGUAGE
Maltese, English
CURRENCY
Euro

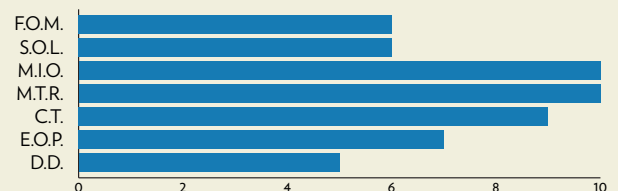


Final score 64%

SAINT LUCIA

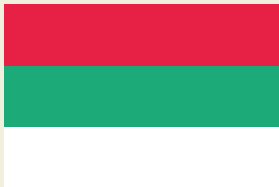


CAPITAL CITY
Castries
POPULATION (2016)*
186,000
OFFICIAL LANGUAGE
English
CURRENCY
Eastern Caribbean dollar

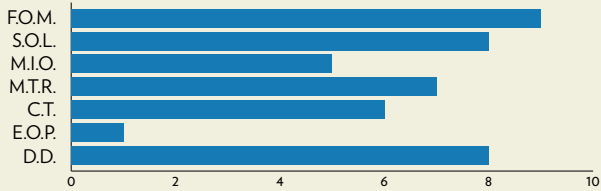


Final score 76%

BULGARIA



CAPITAL CITY
Sofia
POPULATION (2016)*
7,126,000
OFFICIAL LANGUAGE
Bulgarian
CURRENCY
Bulgarian lev

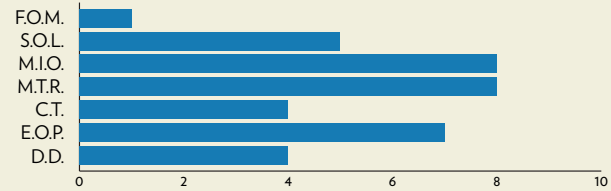


Final score 61%

CAMBODIA



CAPITAL CITY
Phnom Penh
POPULATION (2016)*
15,827,000
OFFICIAL LANGUAGE
Khmer
CURRENCY
Cambodian riel

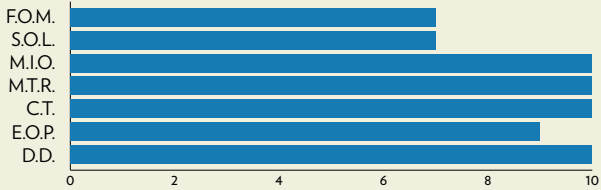


Final score 53%

DOMINICA



CAPITAL CITY
Roseau
POPULATION (2016)*
73,000
OFFICIAL LANGUAGE
English
CURRENCY
Eastern Caribbean dollar

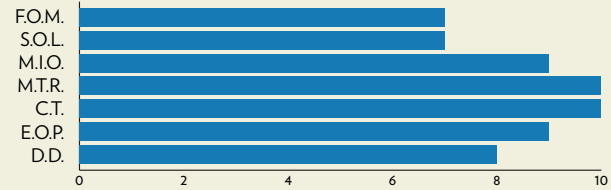


Final score 90%

GRENADA



CAPITAL CITY
St George's
POPULATION (2016)*
107,000
OFFICIAL LANGUAGE
English
CURRENCY
Eastern Caribbean dollar

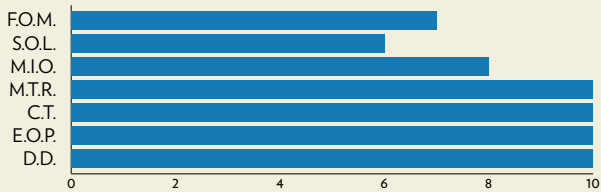


Final score 85%

ST KITTS AND NEVIS



CAPITAL CITY
Basseterre
POPULATION (2016)*
56,000
OFFICIAL LANGUAGE
English
CURRENCY
Easter Caribbean dollar

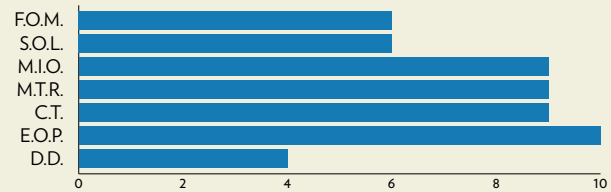


Final score 88%

VANUATU



CAPITAL CITY
Port Vila
POPULATION (2016)*
270,000
OFFICIAL LANGUAGE
English, French, Bislama
CURRENCY
Vanuatu vatu



Final score 76%

* Source: the World Bank Data Bank

