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Turning regulation into value



University of St.Gallen

STRENGTHENING WHOSE TS

VIEW TRANSNATIONAL REGULATION AS CRUCIAL TO YOUR BANK'S SURVIVAL



Turning regulation into value

A study by KPMG AG Switzerland

in cooperation with the Institute of Management at the University of St. Gallen.

Philipp Rickert, Partner and Hans Stamm, Director

Prof. Dr. Dr. Tomi Laamanen

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IMPLEMENT REGULATION PROMPTLY, FOCUSING ON ADDED CLIENT VALUE

Focus on niches.

7%

GOVERNMENT AND REGULATION

Core team:

KPMG Switzerland University of St. Gallen (HSG)

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Greater protection of clients' assets has been high on regulators' agendas since the 2008 financial crisis. For private banks, this means a wealth of new and expanded transnational regulation, some of which has already passed into Swiss law. Respondents in our last private banking study -«Success through innovation» (2013) - envisaged a transformation of their industry. They cited regulation alongside profitability concerns, potential scale benefits and technology-enabled opportunities as a key driver of change. Our new study demonstrates how regulation in particular is at the center of this transformation, and we discuss how Swiss private banks can turn regulation into value.

As the Swiss private banking industry depends heavily on access to foreign client bases and markets, the negative implications of not securing an international level playing field would be severe.

Philipp Rickert and Hans Stamm, KPMG Switzerland

Introduction

- Switzerland's governmental, regulatory and banking industry bodies must therefore engage positively, proactively and in a coordinated manner with the development of transnational regulation. Importantly, they must find an appropriate, principles-based approach to local implementation.
- It is then down to market participants to use regulation as an impetus to innovate business models and improve client satisfaction, particularly by creating value for clients through superior service quality and professionalism. Doing so will restore confidence in the industry and allow Swiss banks to more effectively seek out new growth opportunities.
- We hope you find our insights in this study interesting, and we would invite you to discuss with us their implications for your organization.

PROGRESSIVE, ADVANCED REGULATION STRENGTHENS INTERNATIONAL COMPETITIVENESS

The determinants of the competitiveness of an industry sector or cluster in a given country were first introduced in Harvard Business School Professor Michael E. Porter's book, «Competitive Advantage of Nations». We believe these determinants remain of utmost relevance for the private banking industry.

Known as the «Diamond model for the Competitive Advantage of Nations», his model comprises four inter-connected elements relating to a particular sector and country:

- **1 Firm strategy, structure, and rivalry**: the intensity of competition;
- 2 **Demand conditions:** the nature and level of advancement and sophistication of the clients of the products and services;
- **3 Related and supporting industries:** the existence of other sectors that support the industry's success; and
- 4 **Factor conditions:** the existence of an educated workforce and other factors of production required.

In addition, **government influence** interacts with the other four.

The more favorable the factors are for the development of an industry sector or cluster, the more internationally competitive it becomes.

The more competitive an industry in a particular country, the more competitive the winning firms become when competing internationally.

Similarly, the tougher and more demanding are the customers, the more advanced and sophisticated are the processes the industry sector will produce.

Taking into consideration Professor Porter's model, together with our own insights and experience, we argue that: the more progressive and advanced the regulation aimed at the Swiss private banking industry, the stronger the banks can be expected to become internationally. This because they must learn to cope with the regulation, develop more sophisticated processes and business models, and innovate more than their foreign counterparts.





VIEW TRANSNATIONAL REGULATION AS CRUCIAL TO YOUR BANK'S SURVIVAL

Swiss private banking remains an export-led business. Swiss governmental, regulatory and banking industry bodies must play a proactive role in shaping transnational regulation to ensure an international level playing field and restore the industry's superior reputation.

ADOPT AN APPROPRIATE AND PRINCIPLES-BASED REGULATORY **APPROACH**

Transnational regulation should apply to all Swiss private banks in the interests of client protection and confidence. However, implementation should be appropriate and principles-based.

IMPLEMENT REGULATION PROMPTI FOCUSING ON ADDED CLIENT VALUE

Adapt your strategies and seek ways to generate further value for you and your clients. Communicate the value of regulatory-driven changes positively to clients to improve confidence and trust. Do not discharge the banker's responsibility by hiding behind regulation.

RETHINK YOUR BUSINESS MODEL TO REALIZE EFFICIENCIES AND PURSUE GROWTH

Significant investment will be needed in digitalization to comply with new regulation. Use the opportunity to redesign your business model, innovating to position the bank for future growth.

EVOLVE THE RELATIONSHIP MANAGEMENT **APPROACH AND CLIENT** COMMUNICATIONS

UTILIZE TECHNOLOGY FOR EFFECTIVE **OPERATIONALIZATION**

Form a seamless triangle between regulatory requirements, client expectations and your bank's operational excellence. Use digitalization and big data to enhance service quality and provide transparent pricing models while delivering cost efficiencies.

Fulfill clients' expectations for their RM to be a personal coach, to take on a more sociable role, and to have at his disposal a range of technologies to enhance the client experience and convenience, while complying with applicable regulation.

Client Satisfaction TRANSMATIONAL REGULATION

EXECUTIVE SUMMARY

As an export-based industry, the survival of Swiss private banking depends on its access to an international client base in relevant markets. Adoption of transnational regulation is especially critical as the foreign onshore business gains importance while the offshore business declines. Transnational regulation should therefore not be seen as an option. Rather, it is central to a sustainable and successful Swiss private banking model. Successful adoption of transnational regulation requires proactive engagement by Swiss governmental bodies, FINMA and banking industry groups such as the SBA. They must seek to positively shape regulation, uniting to ensure an international level playing field on which Swiss banks can demonstrate their competitive advantages of professionalism, high service quality, and political and economic stability. Implementation of regulation should be on an appropriate, principles-based manner, however, and banks that do not comply must be held accountable.

principles-based manner, however, and banks that Implementing change is the first step. Communicating it is also vital. Banks must clearly articulate the value of regulatory-driven changes for clients, including For their part, banks should embrace and implement higher service quality, helping clients better regulation fully and promptly, with the ambition of understand their risk appetite, more tailored solutions increasing value and experience for their clients. In through the bank's use of big data and, crucially, addition to securing their ability to access foreign greater transparency over products and pricing clients, regulation can deliver a range of advantages. models. Regulation should not be used as It will help banks to enhance their USPs in core an instrument to shift responsibilities for financia markets, adapt strategies and seek new ways to activities from the bank to its clients. generate value for both bank and client. Choosing to Proactively embracing regulation will help restore over-comply with client regulation in particular will clients' trust and confidence in Swiss private produce higher levels of client satisfaction. banking. It will facilitate higher service quality at Technology is a key enabler of this change - but while competitive rates, connecting banks and clients digitalization is a top issue on banks' agendas, more effectively. It will also cement the competitive it is not being applied as much as it should be. Banks advantages of Swiss banks on the global stage and secure Switzerland's role as a leading wealth must become more technologically savvy, standardizing and digitalizing core processes (which management hub. will yield cost efficiencies) as well as introducing

a range of communication channels that clients increasingly expect. Clients want their RM to be a personal coach, to play a more sociable role, and to have at his disposal a range of technology-based tools to add more value during meetings and other interactions. Such tools, incidentally, will be helpful in gaining access to new generations of clients and those at a geographic distance such as in emerging markets.

BUSINESS ///OCE

Priority agenda for action

We have combined our own insights with the results of our interviews and online survey. The result is a number of action points that Swiss private banks and their regulators, industry bodies and relevant governmental bodies should consider in helping the industry to turn regulation into value.

Use regulation to secure the **competitiveness** of Swiss private banks..

- Ensure strict supervision and controls when introducing transnational regulation into Swiss law, to achieve an international level playing field.
- Adopt a united voice between Swiss governing bodies, FINMA and the banking industry. Shape a common agenda and participate proactively in transnational regulatory developments to help maintain Switzerland's preeminent role.
- Ensure reciprocity of market access through transnational regulation, to secure continued access for Swiss banks to foreign client bases as well as foreign banks' access to Switzerland.

...while helping banks protect clients' assets and restore trust

- Implement transnational regulation in an appropriate, principles-based manner rather than on a prescriptive rules basis.
- Ensure early and proactive involvement of banks in discussions with FINMA and Swiss governmental bodies when creating new regulation in order to achieve good regulatory standards that are centered on the client rather than on regulators and banks.
- Proactively engage in a cultural change within the bank to secure client benefits when introducing new regulation.

Acknowledge regulation's use in **enhancing** your business model and seeking sustainable growth...

- Redefine business models and focus clearly on core competencies, markets and services. Consider collaborations, strategic alliances and outsourcing for non-core activities.
- · Ensure your strategy is aligned with regulation, forming a seamless triangle between regulatory requirements, client expectations and operational excellence.

... creating efficiencies and differentiation by digitalizing operations...

- · Assess the changing needs of different client segments. Clients increasingly expect their private banks to provide the same level of digital sophistication as they get from retail banking.
- Reassess the respective merits of being a first mover versus taking time to see which technologies will be successful before investments are committed.
- Consider joining forces with technology providers to co-create solutions that fit the core banking platform and respond to the bank's specific needs, e.g. for suitability, on-boarding and the client advisory process.



...taking advantage of the potential of **big data...** empower them to seize opportunities such as helping clients through the voluntary giving you better access to, and analysis of, disclosure process. client data • Collect structured data to enhance the Dramatically improve client communications... effectiveness of targeting existing clients, • Assess the quality of your client increase transparency, and reduce communication. Ask clients how they wish the knowledge drain when an RM leaves to communicate and build specific the bank. clusters such as face-to-face, electronic or • Redesign pricing models, keeping them a combination thereof. simple and transparent in line with • Support the RM by providing electronic clients' increasing price sensitivity. Clearly devices such as tablets to lead through the articulate to clients the value of the new client's portfolio and enable him to simulate pricing models. outcomes. • Bring in an expert from another industry to deliver insights to improve segmentation, ...and fundamentally change the RM's role and profile to enhance client satisfaction use and analysis of client data, product offering, and pricing model sophistication. • Strengthen the RM's role, making him the client's «mini family officer» and sparring ..and recognizing the role of the board of partner. Set up training modules to equip the RM to better serve a more sociable and inter-personal relationship. Ensure the RM develops an in-depth knowledge of the client. BoD needs to adequately supervise • Free up the RM's schedule to spend more regulation implementation and sustainable time with the client and improve service compliance. quality. Where appropriate, delegate work to specialists in property advisory,

- Ensure your IT system is capable of

directors and senior management in implementing regulation Consider which skill-sets and expertise the Define at a BoD level the implementation

- strategy and principles, in particular to what level (over-compliance or minimal compliance) upcoming regulation will be introduced.
- Help RMs understand and comply with regulation, seeing it as an opportunity rather than a threat or hindrance. Equip and

insurance advisory, pension plans etc. Replace manual processes with a simple and automated client onboarding and client advisory process.

• Ensure the RM's incentivization is in line with the bank's strategy and culture in this new regulatory environment.



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Clarity on The Future of Swiss Private Banking

MANNER.

Methodology and glossary

This study is based on a combination of qualitative interviews and a quantitative online survey. A total of 50 banks in Switzerland and Liechtenstein were included in our study.



Key findings:

 Throughout this publication, the «Key findings» sections are based on the results of the interviews and survey. They are not necessarily the views or positions of KPMG and / or the University of St. Gallen, whose views may be found in the «Our insights» and «Agenda for action» sections of this publication.

GLOSSARY

AEol	Automatic Exchange of Information	
AuM	Assets under Management	
BoD	Board of Directors	
CDC	Client Data Confidentiality	
CHF	Swiss Francs	
CISA	Collective Investment Schemes Act	
FATF	Financial Action Task Force	
FIDLEG	Swiss Financial Services Act	
FINMA	Swiss Financial Supervisory Authority	
FSB	Financial Stability Board	
HNWI	High Net Worth Individual	
M&A	Mergers & Acquisitions	
MiFID	Markets in Financial Instruments Directive	
OECD	Organization for Economic	
	Co-operation and Development	
RM	Relationship Manager	
SBA	Swiss Bankers' Association	
UHNWI	Ultra High Net Worth Individual	
USP	Unique Selling Proposition	

Chart sources All charts and graphics are sourced from KPMG and / or the University of St. Gallen based on the results of the interviews and survey, unless specifically stated otherwise.

DEFINITIONS

- The terms «banks», «banking», «private banks», «private banking» and «wealth management» are used interchangeably for the purpose of this publication. All refer to private banking unless specifically stated otherwise.
- «Swiss private banking» refers to the private banking industry in Switzerland and Liechtenstein.
- Pure private banks: refer to banks that operate exclusively in the wealth management field.
- Universal banks (including cantonal banks): refer to banks offering a range of private, retail and corporate banking services.
- Swiss subsidiaries of foreign banks: refer to the private banking or universal banking subsidiaries in Switzerland of non-Swiss banks.
- Transnational regulation: refers to regulation issued by international regulators and organizations such as the OECD, EU and FSB. It is a combination of 'hard laws' and directives, as well as softer rules such as guidelines, standards and rankings.
- Big data refers to large data sets that are difficult for commonly utilized software tools to capture, manage, process and analyze. It typically relates to substantial volumes of structured and unstructured data.
- For ease of reading, we refer to RM and client throughout the publication as «he» or «him». In this context, this refers to both he or she, or his and her.

Detailed study results

CHAPTER I

Restoring trust and securing Swiss banking preeminence

The events of 2008 contributed to a legitimacy crisis in the global banking industry. A severe decline in the public's confidence and trust was accompanied by serious questions over the appropriateness of banking business practices and structural failures to address key stakeholder requirements. Key concerns surrounding the private banking industry regarded tax morality and transparency.

As a consequence, recent national and transnational regulatory developments seek to establish an international level playing field by effecting cultural and behavioral change throughout the industry. New regulation aims to restore confidence in the private banking business model, allowing it to fulfill stakeholder demands and prosper as a sustainable business.

«BANKS WILL REMAIN PROFITABLE THROUGH REGULATION»

Interviewee from a universal bank

«ADOPTING TRANSNATIONAL REGULATION IS CRUCIAL FOR SWISS PRIVATE BANKING TO SURVIVE. HOWEVER, ONLY THOROUGHLY THOUGHT-THROUGH (AUGENMASS) REGULATION WILL LEAD TO ADDED VALUE FOR CLIENTS AND BANKS»

viewee from a pure private bank

25

A wealth of transnational regulation

Transnational regulation refers to regulation issued by international regulators and organizations such as the OECD, EU, FSB and FATF. It is a combination of 'hard laws' and directives, as well as softer rules such as guidelines, standards and rankings. The private banking industry has seen a recent surge in transnational regulation, such as OECD Art. 26.





Enhancing the competitiveness

of Swiss private banks

Transnational regulation is an effective framework to eliminate, control and monitor uncompetitive business practices such as legal and regulatory arbitrage and circumvention. It can provide reciprocity of market access, securing Swiss banks' access to foreign clients and markets. It also establishes an international level playing field on which Swiss banks can demonstrate their superior competitive strengths. Full, appropriate and prompt compliance with transnational regulation is necessary to drive the maximum benefit for Swiss private banking. It is also key to Switzerland's status, competitiveness and reputation as a sustainable, leading hub for global wealth management.

Key findings:

- · Most banks interviewed believe that a comprehensive, regulated playing field framework would enhance the industry's reputation.
- · Almost all respondents are of the opinion that implementing transnational regulation in Swiss law will improve the reputation of the Swiss financial center. It will create additional growth opportunities by leading to an increased focus on the international client business.
- Respondents generally acknowledge that the financial crisis made it necessary to revise and expand regulation and supervision. Due to the increasing volume and extent of transnational regulation, however, banks expect the Swiss regulator and the SBA to participate more proactively in co-creating transnational regulation.

Our insights:

- We believe that only a strong collaboration between Swiss regulatory authorities and international institutions will lead to an international level playing field. Active engagement by Swiss representatives in the creation of new rules will strengthen Switzerland's position.
- In our opinion, transnational regulation presents an opportunity to bring Swiss private banking in line with international standards as well as providing reciprocity of cross-border market access.
- Adoption is the only way for Swiss banks to remain internationally competitive. Full, appropriate and prompt compliance is needed to avoid costly delays and to enhance both efficiencies and added value for clients.

.. the financial center improving its reputation and Switzerland being recognized internationally as a «clean» financial center.

growth opportunities by increasing the focus on the international client business

.. Swiss banks becoming more competitive in view of foreign providers.

. the necessity of a dual (transnational / national) regulatory system because of the specificities of a «Swiss finish»

... a huge change in business models.

higher implementation costs which would have a negative influence on banks' profit situation

∩ 0/₋

AGENDA FOR ACTION:

- Ensure strict supervision and controls when introducing transnational regulation into Swiss law, to achieve an international level playing field.
- · Working groups comprising delegates from across Swiss governance bodies and industry representatives should contribute to the creation of global standards and to



Switzerland's response to these standards. Achieving an international leadership role in selected important topics is essential. • Ensure reciprocity of market access through transnational regulation, to secure access for Swiss banks to foreign client bases as well as foreign banks' access to Switzerland.

Helping Swiss banks

to protect clients' assets and restore trust

The recent financial crisis and increasing demands for tax transparency have seen the adoption of transnational regulation such as MiFID and AEoI into Swiss law in addition to home-grown regulation. This is necessary to restore clients' trust and confidence in a private banking business model whose reputation is considered damaged. An appropriate, principles-based approach to implementing regulation is required, however.



They will provide transparency for the client and thus help him / her decide on products

Clients will be better informed of the risks borne by the products.

Clients will have more rights against the bank.

They will improve clients' confidence in the bank

Regulations are not pragmatic and patronize clients



AGENDA FOR ACTION:

- Seek a principles-based approach that assures an appropriate implementation of regulation, involving regulators deciding what should be regulated and banks how it should be implemented. There should be a collaboration to operationalize regulations.
- Ensure early and proactive involvement of banks in discussions with FINMA and Swiss

Key findings:

- Most respondents believe that present regulatory developments will increase transparency for clients by encouraging banks to help them decide on products and services and understand associated risks. This will also strengthen clients' rights vis-à-vis banks.
- Only a minority feels that new regulation will restore client confidence in the private banking business and in banking generally.
- Most respondents believe that regulation is inappropriate and patronizes clients. Furthermore, it disproportionally shifts responsibility to clients, allowing bankers to hide behind regulation.
- An appropriate implementation of regulation is considered critical to growth. The Swiss regulator should take into account differences between banks, in particular differences based on the bank's business model.
- Further, banks are of the opinion that a lack of differentiation prevents the market from developing with regard to new types of banks, products, distribution systems etc. A «one size fits all» approach to regulation is inappropriate and could hinder future success.

Our insights:

- Both present and future regulatory developments are necessary for the private banking industry to meet stakeholders' demands and to prosper.
- Proactive and early involvement of banks in the process of creating new regulation is necessary.
- Regulation should first and foremost protect the trusted relationship between banks and their clients.
- In our opinion, banks underestimate the potential for regulation to improve client confidence, especially among foreign clients. While responsible business practices play a key role, proactive implementation of new regulation will lead to a higher standard of service. It will improve the attractiveness of banks to clients, provided banks use regulation to place the clients interests at the center of their activities.



governmental bodies when creating new regulation in order to achieve good regulatory standards that are meaningful for clients rather than for regulators and banks.

• Proactively engage in a cultural change within the bank to secure client benefits when introducing new regulation.

Strengthening whose hand?

The impact of new regulations on banks and clients



FIDLEG

(the Financial Services Act) aims to improve client protection and create a level playing field. It contains rules regarding the provision of financial services and financial instruments, and facilitates the enforcement of clients' claims against financial institutions. It is expected to take effect in 2018.

- 50% of respondents are of the view that new FIDLEG regulation benefits the client more than it benefits the bank through enhanced transparency and protection. Swiss subsidiaries of foreign-owned banks favored FIDLEG more, as these banks are ahead of Swiss counterparts due to parent groups' needs to fulfill home country requirements.
- A further 30% see no benefit to either banks or clients. They consider that the client is patronized in making investment decisions due to a limited range of products and services. Banks incur high compliance costs. Clients with lower assets will pay proportionately more. • Only 20% believe that the additional knowledge collated by banks on their clients allows
- the bank to better fulfill the client's needs.

AEol

(Automatic Exchange of Information) involves the systematic and periodic transmission of taxpayer (individuals and corporations) information to the taxpayer's country of residence by the country in which the bank is domiciled. AEol will be implemented in Switzerland in January 2017, with the first exchange of information due in September 2018.

• 45% of respondents believe AEoI benefits neither bank nor client. They argue that implementing and maintaining systems and tools to record the necessary data involves high cost and no value. Some raised concerns over data protection and confidentiality vis-à-vis access by foreign tax authorities.

- 35% of respondents are of the opinion that AEol benefits banks and the finance market by cleaning up issues and improving reputation. An international level playing field yields fresh opportunities. AEol allows banks to focus on their core business rather than tax matters.
- 15% think AEol benefits both client and bank, based on a combination of the above arguments. Clients appreciate the clear trend towards transparency and declared assets.
- The remaining 5% see an advantage of the AEoI for the client but not for the industry.

CDC

FINMA released a revision of its Circular 2008/21 on «Operational risks at banks» that defines requirements for the handling and protection of electronic client data (Client Data Confidentiality, CDC) within banks and securities dealers. It came into effect on January 1, 2015.

- 40% of respondents believe CDC benefits neither bank nor client. They view it as a necessity to ensure client data confidentiality. Security costs can be high, yet the AEoI has rendered the topic less important.
- 25% of respondents think that CDC benefits both bank and client. Firstly, data confidentiality enhances the bank's reputation. Secondly, clients have trust and confidence that the bank is protecting their privacy against third parties. Some respondents noted that the client himself typically poses the higher risk due to sometimes being careless with banking data.
- 20% consider CDC benefits clients, while it only causes additional costs to the bank.
- 15% believe CDC advantages the bank through reduced reputational risk.

Regulation as a key driver of strategy and the business model

Enhanced regulatory requirements oblige banks to take into account new variables when (re)defining business models to ensure compliance, competitiveness and value creation. Implementation costs can be high given the volume and scale of new regulation, diverting resources from the business or client-related activities. Rethinking business models, together with the necessary significant investments, can however lead to improvements in processes and efficiency. Many banks interviewed – especially smaller ones – have chosen to focus on improving processes, reducing geographic presence and cutting costs to adapt to new competitive realities.

While it is important to ensure cost-efficient operations in order to remain competitive (not least due to the cost impacts of a strong Swiss franc), cost cutting may be insufficient to survive in the increasingly transparent global private banking industry. Banks must not take their eye off growth opportunities represented by digital technology and access to emerging markets, for instance. Innovation can help in this regard, improving the bank's ability to pursue foreign clients.

«CHALLENGE IS NOT THE REGULATION BUT THE DIGITALIZATION»

Interviewee from a pure private bank

«BIG DATA OPENS NEW OPPORTUNITIES, THERE IS LESS INEFFICIENCY SINCE CLIENTS CAN BE APPROACHED WITH TAILORED PRODUCTS»

erviewee from a universal bank

Sharpening strategies and areas of focus

Regulatory change forces banks to sharpen their strategies in terms of business scope and scale, particularly given the increased focus on onshore business and the decline in offshore banking. The operational scale of larger banks enables them to absorb regulatory costs while continuing to invest in high growth markets, proactive digitalization and consolidation. Smaller and mid-sized banks must assess whether they have potential to grow into a large player or whether they should focus on a reduced number of geographies or customer segments.

Key findings:

- Regulation and intensifying competition will cause the minimum size of a private bank to increase, according to respondents.
- · Respondents believe the two most viable options for smaller banks are a niche focus or breaking up the value chain by collaborating with other institutions. Outsourcing is seen as an enabler of an even sharper focus on selected market niches.
- Most respondents view alliances and outsourcing as their main options in light of regulatory changes and the pressure to focus. While M&A is seen as part of the strategy toolkit, it is to strengthen established market positions rather than expand into new markets.
- Despite most future growth being expected from emerging markets, most respondents have reduced their international scopes: in terms of countries actively served and assets of foreign-domiciled clients. This is especially the case among universal banks, where a large majority has done so because of increased regulation.

A clear choice: strategic positioning and differentiation

We asked interviewees to position themselves on a strategy map according to where they see their particular bank's own differentiators.

- Cantonal banks (CB) are predominantly positioned to benefit from a higher degree of industrialization enabled by their retail banking operations combined with differentiation through technological innovation and proximity to clients.
- Pure private banks split into two main clusters:
- > PB1 banks have chosen a pure differentiation strategy with little or no desire to industrialize operations. These are mainly the smallest banks.
- > PB2 banks have opted to combine clientbased differentiation with technological differentiation.
- Large, globally operating Swiss private banks (GPB) and Swiss subsidiaries of foreign banks seek to combine operating scale, technological advancement and differentiation by focusing on selected key clients or client segments. Many have a particular focus on UHNWI clients and family offices.



Minimum size: the Swiss private bank of the future

Interviewees found it difficult to provide an absolute figure for the minimum size of a private bank, with the number being influenced by the bank's business model. They cited a lower sustainable minimum size for banks with a clear focus on particular client segments, a narrow product range and only domestic operations. The minimum size is less relevant for private banking businesses of cantonal banks and subsidiaries of foreign-owned banks due to synergies with other parts of the business.

At the same time, most agreed that regulation will cause the minimum bank size to increase. Most consider that the future minimum private bank size will be more than CHF 5 billion AuM. Only one quarter of respondents foresee a private bank surviving long-term with less than that amount - and only then if it has a sharp strategic focus. More than half of respondents believe the minimum size will be above CHF 10 billion AuM.

Respondents were unanimous regarding strategic options for smaller banks. They see the most viable options to be a focus on smaller niches and a break-up of the value chain by collaborating with other firms and institutions. Many noted that

Innovation - Exploration

if this is unsuccessful, the other option would be to put up the bank for sale. Realistic short-term alternatives were considered to be exchanging the banking license for a CISA license or converting the bank into a family office.

In this context, we see three routes to success. A new regulation reduces a bank's productivity, a focus on core competencies becomes essential, and non-core activities should be outsourced or executed through strategic collaboration with business partners. A focus on key geographical markets is vital due to the need to develop different regulatory competencies for each covered country. Despite the fact that most future growth is expected to come from emerging markets (or at least from outside Switzerland) most respondents have chosen to reduce the number of countries actively covered and the assets of foreign-domiciled clients. With the exception of Swiss subsidiaries of foreign banks, respondents put more emphasis on attracting new clients than growing share of wallet. Finally, it is important to apply an appropriate client segmentation and to maintain a clear focus on key products and services. Enhanced regulation requires banks to adapt offerings. This demands a clear understanding of clients' needs.

CHAPTER II · Regulation as a key driver of strategy and the business model



Reduced productivity due additional costs.





Exchange the banking license for a CISA-license

Convert the bank into a family office

Our insights:

- Pressure on small Swiss private banks even in their home market - will create opportunities for entrants from emerging markets to use M&A to gain access to Swiss private banking capabilities.
- In our opinion, small banks will increasingly become niche players. Differentiation will enable them to secure parts of the available profit pool, introducing true service and marketing innovation. Niche players excel as they understand new ways of meeting clients' needs. Banks that are unable to differentiate will disappear.
- Cantonal banks' private banking businesses benefit from stability and scale provided by the retail banking business. They are able to share investments made by the retail banking business in information technology infrastructure, for example.
- Consolidation and synergies are ways to deal with new cost and profitability realities. Fewer banks and more strategic alliances will dominate the future marketplace.

AGENDA FOR ACTION:

- Align business models with regulation. Ensure the bank's strategy fits the new regulatory environment, forming a seamless triangle between regulatory requirements, client expectations and operational excellence.
- Redefine business models and focus clearly on core competencies, markets and services. Identify where scale effects may be achieved. Explore strategic collaborations with business and consider outsourcing noncore activities.

Which options are available to smaller banks

- Universal and cantonal banks: consider the extent to which information technology or other investments can be spread over private banking as well as retail operations while adding value to both.
- Smaller banks in particular: differentiate further in order to survive profitably. A focus on niches and forming alliances is essential. Strategies should focus on domestic markets or clearly define the cross-border markets, service offerings and client segments.

Creating efficiency and differentiation

by digitalizing operations

Digitalization offers opportunities for banks to become more efficient and to differentiate themselves from competitors. While Asian and North American banks have led developments in digital banking, this has also gained momentum in Switzerland. For many banks this has meant digitalizing back-office processes. We observe a clear trend towards digital technologies being increasingly adopted in interactions with clients in order to improve the client experience.

Key findings:

- More than half of respondents state that digitalization is a high priority on their strategic agendas. They cite it as gaining significance in the private banking value chain. However, although almost all banks recognize digitalization's importance, only a few have started work on it.
- Despite digitalization's perceived importance, several banks have opted for a follower strategy. They want to understand which solutions will be established as standard before they decide in which technologies to invest. Universal banks with retail banking operations seem to have taken the lead in leveraging their digital platforms also for their private banking clients.
- Respondents cite businesses such as PayPal as being potentially disruptive for the retail banking business, though they are not seen to yet represent any major danger for the private banking business as they target different customer bases.
- Despite digitalization being expected to create new information security risks, the majority of respondents state that they are able to deal with these risks.
- Some respondents argue that digitalization provides little added value to direct client interaction, in particular with larger clients, who still want direct personal contact with their RM.

Our insights:

- · Pure private banks, foreign banks and universal banks are increasingly digitalizing their operations, in particular suitability, client on-boarding, advisory and reporting processes. Yet, overall usage is still at a relatively low level. In addition to the more technology-savvy new generations, clients in different countries and regions progress with digitalization at different speeds. Many emerging market clients require their private banks to have advanced digital capabilities.
- Universal banks use digital technology more frequently than pure private banks and foreign banks. They see e-banking and mobile banking solutions as core elements of their offering.
- · Pure private banks and Swiss subsidiaries of foreign banks focus their digitalization efforts on enriching existing communication channels. Information/advisory platforms and digital technology to support RMs in client meetings are among the preferred digital solutions.



AGENDA FOR ACTION:

very often

- · Assess the changing needs of different segments. Digitalization is becoming increasingly commonplace in many areas of life. Private banking clients will increasingly expect their private banks to provide the same level of sophistication in the digital space as they get from retail banking.
- Reassess the respective merits of being a first mover versus taking time to see which technologies will be successful before

nt	client	

investments are committed. The latter approach lowers risk but also reduces the likelihood of gaining a competitive advantage from digitalization.

• Consider joining forces with technology providers to co-create solutions that fit the core banking platform and respond to the bank's specific needs, e.g. for suitability, on-boarding and client advisory process.

Using big data to drive benefits

The regulatory environment requires banks to collect large amounts of data. A structured approach to new client data touch points and the sourced data facilitate a better understanding of client profiles. This enables banks to improve their behavior- and need-based client segmentation, to enhance matches between client profiles and services offered and to deploy new products and price models. The structured use of data encourages a lower dependency on RMs' information about clients and increases effectiveness when approaching clients. In addition, private banks are moving towards transparent pricing models and costs of products and services.



Establishment of an early warning system to recognize future client needs.

Products developed more precisely and more tailored to needs of individual client groups (product suitability).

Clients' readiness for higher sales volume, specifically also for products/services with higher margins.

Improved customer relationship/lovalty

No benefit because larger amounts of client data are not/cannot be used.

Key findings:

- Regulatory frameworks require private banks to collect and store client data. Digitalizing this data and structuring it so it can be analyzed further is a challenge with which banks struggle. Banks understand the value of structured data yet generally make no use of it due to technological restrictions.
- A technology-supported and structured data collection and analysis of client data will help banks further differentiate themselves, recognize clients' emerging needs, and ultimately improve client satisfaction.
- Enhanced regulatory requirements lead banks to focus more on new and transparent

pricing models, dynamic client segmentations and more personalized products and services.

- Pure private banks see less benefit than universal banks or Swiss subsidiaries of foreign banks from larger amounts of client data in respect of segmentation and product needs.
- Respondents appear to recognize the importance of enhancing front-end aspects but are investing more heavily in the back-end.
- The majority of respondents see the potential to learn from other industries how to better segment their clients, and how best to tailor and package products to individual client groups.



How do you think more transparent pricing models will influence the client's behavior?

Our insights:

- Using big data is necessary to remain compliant with regulation in an efficient manner and is helpful to demonstrate such compliance.
- Additional data gathered due to new regulation will add value to banks. It will help them differentiate through dynamic client segmentation and greater customization of otherwise standardized service offerings.
- Clients will benefit from better-tailored and personalized offerings that suit their needs, delivered across all touch points of the client interaction process.
- Private banks will be able to innovate pricing models, making clients more willing to pay for further non-traditional approaches such as advisory services, performance fees or time-based pricing.
- We expect price negotiations between banks and clients will become more difficult due to transparency of future pricing models and comparability to competitors' pricing strategies.

AGENDA FOR ACTION:

- Ensure your IT system is capable of I and analyzing larger volumes of clien data. Also ensure that it can make clien available in a structured form to allow targeted use.
- Collect structured data to:Reduce the knowledge drain when
- leaves the bank.
 Enhance the effectiveness of targe existing clients with tailored services, products and communica
- Increase transparency to enhance reputation and client satisfaction.
- Redesign pricing models, keeping the simple and transparent in line with clients' increasing price sensitivity. Co the extent to which clients are open t non-traditional approaches such as ad services, performance fees and timepricing.

holding ent ient data w	• Bring in an expert from another industry to deliver complementary insights to improve the bank's segmentation, use and analysis of client data, product offering, and pricing model sophistication.
an RM	 Use additional data gathered to improve and tailor offerings and approaches.
eting	Assess whether package offerings are attractive to particular client segments, especially in light of the fact that future
ations.	client segmentation will include dynamic aspects in addition to assets. These include needs, behaviors, life cycles, preferences and future wealth potential.
hem	
Consider 1 to advisory e-based	

Recognizing the role

of the board of directors and senior management

The board of directors (BoD) and senior management are key to effectively implementing regulation in the business. Senior management plays an important role in empowering and enabling staff, such as permitting RMs to focus on helping clients through the voluntary disclosure process. The right tone should be set from the top of the business. Over-complying with client-related regulation is to be considered a valuable exercise.



Key findings:

- Respondents view regulation as a key topic for both the BoD and management and see substantial attention by these bodies as necessary. A majority believes that special task forces should be formed to achieve an effective and efficient implementation.
- Timely implementation of new regulation depends heavily on the internal risk analysis. Around half of banks initiate a project prior to the publication of final rules, while the other half designate themselves as followers.
- Respondents note that the extent of implementation depends on the regulation. With regard to client compliance and transparency, a large majority of banks say they would move beyond formal regulatory requirements and over-comply. For non-client related areas such as Basel III, fewer banks would do so.

Our insights:

- · Implementing regulation is a leadership matter, and the BoD is in the driving seat. Compliance with regulation is a question of proper business conduct. Proactive adaption of regulation strengthens a bank's reputation and motivates staff, leading to generally higher standards in the organization and to more efficient processes in particular.
- Banks need to consider the extent to which their BoDs possess the necessary skills and expertise to oversee and be ultimately accountable for regulatory implementation and compliance.
- Different degrees of implementing regulation are possible in a successful strategy. Implementation of client-related regulation should, however, go beyond minimum requirements.

AGENDA FOR ACTION:

- Consider the BoD's skill-sets and expertise needed to adequately supervise regulation implementation and sustainable compliance.
- Define on a BoD level the implementation strategy and principles, in particular to what level (over-compliance or minimal compliance) upcoming regulation will be introduced.
- Establish a taskforce or special project team at senior management level, to take responsibility for ensuring all actual and future regulations are implemented professionally, efficiently and effectively.

To what extent will the following aspects be a challenge

- Ensure regulation is implemented or maintained in line with the agreed BoD approach and on a timely basis. Request appropriate reporting from the task force or special project team.
- Help RMs understand and comply with regulation, and to see regulation as an opportunity rather than a threat or a hindrance. Equip and empower them to seize opportunities such as helping clients through the voluntary disclosure process.

Ensuring client satisfaction

through improved relationship management

Banking remains a business based on trust. It is of paramount importance that client satisfaction tops the industry's agenda. The bank must put the client at the heart of its activities, ensuring open and transparent communication. Ethical behavior, fair pricing, data protection and good organization will help generate client confidence.

At the same time, clients' demands are changing. They expect the RM to be a personal coach, providing support that goes beyond traditional service offerings. This involves putting the client at the center of the relationship and servicing his needs rather than being a «spreadsheet manager».

Although this yields opportunities for the bank to facilitate more fruitful communications, this «new normal» in client servicing requires a change in mindset regarding RMs. Banks must ensure that RMs are trained and equipped to serve such evolving needs, in particular those of new generations of clients.

«THE ROLE OF THE RELATIONSHIP MANAGE WILL BE EVEN M COMPREHENSIV THAN TODAY – HE LIKE A «MINI FAMIL **AND SPARRING PAR**

Interviewee from a pure private ban

Clarity on The Future of Swiss Private

S ARE BECOMING RE DEMANDING SK FOR REAL TIME **ON ANYWHERE** AND ANYTIME»

Interviewee from a subsidiary of a foreign bank

Dramatically improving

client communications

While face-to-face communication remains an integral part of the mix, there is an overall increase in the frequency of bank-client communication through a greater range of channels. Ultimately, it remains at clients' discretion how they prefer to communicate with their RM.

Banks are therefore advised to revisit their communication strategy, in particular which channels are offered to clients. They should bear in mind the growing need to use technology to communicate with clients over great distances, especially in emerging markets.



Key findings:

- Digitalization is largely seen as a complement to existing communication. Clients generally use digital communication tools for private use, and now increasingly for business.
- Most respondents take the view that new digital channels will lead to a dramatic increase in digitalized communication between clients and banks. They nevertheless remain of the opinion that verbal communication does - and will continue to - play an important role.
- The pace and frequency of communication will also increase. The majority of clients demand 24-hour access to information. They want to be able to view vital information online at their convenience, irrespective of location and time.
- Respondents believe the role of social media in the provision of information will become more important, especially for exchanging thoughts on investment opportunities.

Our insights:

- We see communication becoming more frequent and more intensive, triggered by the new wave of transparency and new means of electronic communication.
- We expect a revolution in client advisory communications. Client meetings will be much more effective as the RM will be equipped with digital tools such as tablets that enable him to demonstrate and simulate portfolio analyses and new strategies, among others.
- Regulation will help drive communication between client and bank by automating formal documentation matters such as investment recommendations and advisory protocol. This will yield greater efficiency and will increase the quality of client documentation.

AGENDA FOR ACTION:

- Assess the quality of bank's client communication. Ask clients how they wish to communicate and build specific clusters such as face-to-face, electronic or a combination thereof.
- Provide key clients with the same access rights to the core banking system as enjoyed by the RM or external asset manager (e.g. 24/7 telephone or online service).

To what extent will communication with clients

• Support the RM by providing electronic devices such as tablets to lead through the client's portfolio and enable him to simulate outcomes. Client documents (e.g. advisory protocol) should be available on demand in a client meeting. Consider and develop usage of social media channels as a new means of interacting with clients for general information purposes.

Fundamentally changing

the relationship manager's role and profile

The RM represents the bank to the client and is the access point for the client's wishes. The RM's role requires excellent client service skills. Although this remains unchanged, the RM will play an increasingly central role going forward. Regulation will help fuel change in the RM's role and profile.

Key findings:

- Respondents are of the opinion that the RM's role and profile will change dramatically and will be more comprehensive. The RM will need to become more of a generalist, have a strong personality, play a sociable role and have an excellent knowledge of his clients' behaviors, needs and family background.
- The RM also needs an adequate knowledge of products and services including non-banking services. His role should, however, lean towards facilitating and coordinating contact between the client and the bank's specialists across property, fund, pension plans etc.
- · Regulatory requirements (e.g. cross-border, suitability) lead respondents to believe that an individual RM's role will be limited to a few target markets.
- Respondents expect a closer relationship between the RM and client to increase client satisfaction and confidence in the bank. An RM certification is not considered necessary.

Our insights:

- We believe that the RM will remain key as the client's entry point to the bank. Adequate knowledge and social competence is essential to provide excellent client service.
- · It is our understanding that clients want to have a «living» banking experience. They wish to enjoy the relationship with their RM, with RMs providing a more personable and sociable service. Overall, they expect a close relationship that is based not only on a business transaction. The RM's role will change from a «spreadsheet manager» to a real servicer of the client's needs.
- Clients expect the RM's advice to always be fully compliant with regulation in order to avoid a breach.
- It needs to be clear that conduct is a major risk for banks and than non-compliance cannot be tolerated.



AGENDA FOR ACTION:

- Critically assess the client advisory organization and processes. Strengthen the RM's role, making him the client's «mini family officer» and sparring partner.
- Free up the RM's schedule to spend more time with the client and improve service quality. For instance, replace manual processes with a simple and automated client onboarding and client advisory process.
- RMs must focus on their core competencies and the new expectations of them. Where

- appropriate, work should be delegated to specialists in property advisory, insurance advisory, pension plans etc.
- Set up training modules to equip the RM to better serve a more sociable and interpersonal relationship. No matter how it is delivered, in-depth knowledge of the client is key.
- Ensure RM's incentivization is in line with the bank's strategy and culture in this new regulatory environment.

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