JULY 2023

# FIRST MILLS



**INITIATING COVERAGE** 

## An essential ingredient, and more!

We initiate coverage on First Mills with a Neutral rating and a PT of SAR97.0. First Mills is the leading manufacturer of flour, animal feed and other wheat derivative products in Saudi and the largest player in the flour market with an estimated value market share of 29.3% in 2022. The Saudi flour market is unique, stable and defensive in nature with the General Food Security Authority (GFSA) being the main supplier to a limited number of producers. The flour market is expected to grow steadily with a 2022-2026f CAGR of 3.5%, led by the bakery (5.5%) and pasta (5.7%) segments. We expect First Mills' net income to record a 2022-2027f CAGR of 7.4% to reach SAR311mn by 2027f driven by expansions, new products, and operational efficiencies. The stock is trading at 2023f P/E and EV/EBITDA of 26.6x and 20.5x vs the peers average of 20.2x and 12.7x, respectively.

The flour market – A unique market with a steady growth

The Saudi flour market is unique, stable and defensive in nature with the GFSA being the main supplier to a limited number of producers. To meet local demand, GFSA supplied and distributed 3.5mn tons of wheat to milling companies to produce c2.6mn tons of flour and other related products in 2021, reflecting a 2018-2021 CAGR of 0.9%. Going forward, the flour market is expected to grow steadily with a 2022-2026f CAGR of 3.5%, led by the bakery and pasta segments. The bakery segment is expected to record a 2022-2026f CAGR of 5.5% while the pasta and noodle segment is expected to grow by a CAGR of 5.7%. Additionally, new segments are expected to be introduced such as Semolina which is estimated to record a strong growth of 6.7%.

• First Mills - A key player with a dominant market share

Founded and headquartered in Jeddah, First Mills is the leading manufacturer of flour, animal feed and other wheat derivative products in Saudi and it is the largest player in the flour market with an estimated value market share of 29.3% in 2022. The company sells more than 48 flour products to a wide range of customers both B2B and retail across Saudi through its four production facilities in Jeddah, Qassim, Tabuk and Al-Ahsa. The company has also presence in other regions through sales and distribution warehouses. The company's facilities have a total flour milling capacity of c1.35mn tons/annum and feed mixing capacity of c0.29mn tons/annum. Additionally, it plans to expand its Jeddah facility by 650 tons/day during 2023f-2025f, introduce new products (Pesa & Mixes) and develop new facilities to produce Semolina by the end of Q4 23f.

Net income to record a CAGR of 7.4% during 2022-2027f
 We expect revenues to grow by 4.5% yoy to SAR955mn in 2023f, driven by higher utilization of wheat mills which will offset the impact of lower prices of feed and bran and we expect net income to remain largely flat in 2023f. Going forward, we expect First Mills

to deliver a 5-year revenues CAGR of 5.5% to reach SAR1.19bn by 2027f. Subsequently, we expect profitability to record a 2022-2027f CAGR of 7.4% to reach SAR311mn by 2027f driven by new capacities, higher utilization rates and the introduction of new products. We expect net margins to expand from 23.8% in 2022 to 26.1% in 2027f.

Initiating coverage with Neutral rating and a PT of SAR97.0
We initiate coverage on First Mills with a Neutral rating and a PT of SAR97.0. We believe
the defensive market dynamics, the company's large market share, expansion plans and
operational efficiencies are the key positives, while the sector's sensitivity to the
potential subsidy removal is the main concern. The stock is currently trading at 2023f P/E
and EV/EBITDA of 26.6x and 20.5x vs the peers average of 20.2x and 12.7x, respectively.

#### **Summary Financials**

SAR mn	2022	2023f	2024f	2025f	2026f	2027f
Revenues	914	955	1,100	1,143	1,168	1,193
Gross profit	398	411	479	511	525	534
Gross margin (%)	43.6	43.0	43.6	44.7	45.0	44.8
EBIT	256	280	326	353	362	367
EBIT margin (%)	28.0	29.3	29.6	30.8	31.0	30.8
EBITDA	307	337	388	416	426	432
EBITDA margin (%)	33.6	35.2	35.2	36.3	36.5	36.2
Net Income	217	213	261	291	303	311
Net Income margin (%)	23.8	22.3	23.7	25.4	26.0	26.1
EPS	3.9	3.8	4.7	5.2	5.5	5.6

Source: The company, SNB Capital Research estimates

## NEUTRAL

Price target (SAR)	97.0
Current price (SAR)	102.0
Upside/Downside (%)	(4.9)

#### VALUATION MULTIPLES

	22	23f	24f
P/E (x)	26.0	26.6	21.7
P/B (x)	7.5	6.8	6.0
EV/EBITDA (x)	22.5	20.5	17.8
Div Yield (%)	2.5	2.5	2.5
c			

Source: SNB Capital Research estimates

#### MAJOR SHAREHOLDERS

Investor	% Ownership
AlMutlaq Industrial Investme	ent Group 30%
Abdulla Abu Nayan Trading	Co. 21%
Al Safi Advanced Investmen	t Co. 12%
Foreign Ownership	1.31%
Source: Saudi Exchange, SNB Capita 2023	al. As of 17 July

#### STOCK DETAILS

510010011100		
M52-week range H/L (S	SAR)	104/64
Market cap (\$mn)		1,510
Shares outstanding (mi	n)	55.5
Listed on exchanges	Saudi Ex	xchange
Price perform (%)	Si	nce IPO
Absolute		44.7
Rel. to market		41.9
Avg daily turnover (mn)	SAR	US\$
Since IPO	390.7	104.2
Reuters code		2283.SE
Bloomberg code	FIRS	TMIL.AB
	www.firstn	nills.com

Sarah AlBassam +966 11 874 7176 sarah.albassam@alahlicapital.com

## **Investment Thesis**

## A unique market with a steady growth

The Saudi flour market is unique, stable and defensive in nature with one main supplier (GFSA) and a limited number of producers. To meet local demand, GFSA supplied and distributed 3.5mn tons of wheat to milling companies to produce c2.6mn tons of flour and other related products in 2021, reflecting a 2018-2021 CAGR of 0.9%. This consists of c3.1mn of imported wheat and c0.4mn tons of local production. Apart from that, Saudi imported c63,000 tons of flour which represents only c2.4% of local demand. Wheat flour/capita in Saudi is expected to increase from 45.7kg in 2021 to 51.7kg in 2026f (CAGR of 2.1%). The flour market is expected to record a 2022-2026f CAGR of 3.5% to reach c3.19mn tons driven by the bakery segment while the animal feed and bran market is expected to grow by a 2022-2026f CAGR of 2.2% due to growth in local meat production.

## Bakery to drive growth

Flour is used in producing different product categories including 1) bakery, 2) pasta and noodle and 3) Semolina. The bakery segment is expected to lead the growth for flour demand in Saudi, recording a 2022-2026f CAGR of 5.5% to SAR52.3bn driven mainly by 1) higher income per capita, 2) expansion of modern trade channels, 3) increased prevalence of western style foodservice outlets which is expected to record a 2022-2026f CAGR of 12.2%. The pasta and noodle segment is also expected to record a strong CAGR of 5.7% in 2022-2026f to reach SAR5.4bn. Additionally, the new Semolina market is expected to record a 2022-2026f CAGR of 6.7% to reach SAR206.4mn with volumes reaching 79,600 tons (2022-2026f CAGR of 3.7%).

## The beginning

Privatization is one of the key initiatives introduced by Vision 2030, which covers a wide range of sectors, including healthcare, education, food and aviation. Saudi has four milling companies which were established in 2017 with GFSA conducting the migration and legal framework as it allocated the 13 milling facilities to the companies. In 2020, the First Milling Company and Third Milling Company privatization was completed with the First Milling Company awarded to Raha AlSafi Consortium and the Third Milling Company awarded to Alrajhi, Ghurair and Masafi Consortium. The second phase was completed in 2021 with the Second Milling Company awarded to Alajlan, NADEC and Olam Consortium while Allana, Al Othaim and United Feed Consortium were awarded the Fourth Milling Company. First Mills was the first to be listed in the Saudi market with the remaining 3 expected to be listed in the coming period. Following to the privatization, we note that GFSA will not issue any new license to milling companies to operate in the market for 10 years.

## A competitive landscape

The flour market in Saudi is dominated by four players located across the country. The companies had a combined flour market share of 88.4% in 2021, while the remaining 11.6% is imports. These companies provide most of the flour supplied to bakeries and manufacturing sector, while imported flour is mainly supplied to retail and HORECA channel. On the other hand, the animal feed market is considered highly competitive and fragmented with a large number of market players, led by ARASCO. The combined animal feed market share of milling companies was 33.3% in 2021, while 22.3% was held by ARASCO.

## Fixed pricing and potential subsidy removal

Wheat is distributed to milling companies by GFSA based on specific agreed upon quantities at a fixed subsidized price of SAR180/ton. In return, flour is sold by milling companies at a fixed price of SAR500/ton to entities that are registered with the GFSA. This results in a

spread of SAR320/ton. Fixed prices are implemented on bulk and 45kg flour (70%, 80% and 95% flour extraction) while 1kg-10kg products pricing is not subject to any pricing regulations. A key point to highlight is that the fixed subsidy regime is expected to expire by July 2025f with no clarity whether the subsidy will be completely removed, amended or maintained. In case the subsidy is removed, we believe flour selling prices will be adjusted upward to maintain the spread broadly stable. We also expect demand to remain unchanged as flour is a main ingredient in most staple food items. Despite that, we believe the removal of the subsidy is a major risk factor for the sector.

#### By-products, attractive market dynamics

Producing by-products is one of the key advantages of Saudi milling companies due to limited additional costs. Although flour pricing is generally fixed, prices of by-products are determined by global wheat prices and supply-demand factors which we believe is a key positive. Feed prices increased to SAR903/ton in 2021 from SAR782/ton in 2020 and compared SAR638/ton in 2019. We believe the sharp increase is due to higher global wheat prices which grew by c20% yoy in 2021. Bran prices followed a similar trend as it increased from SAR712/ton in 2020 to SAR970/ton in 2021 before reaching SAR995/ton in 2022. This is significantly higher than SAR708/ton in 2018. We believe variable pricing for by-products is a key earnings driver for milling companies going forward.

## First Mills - A key player with a dominant market share

Founded and headquartered in Jeddah, First Mills is the leading manufacturer of flour, animal feed and other wheat derivatives products in Saudi. It is the largest player in the flour market with an estimated market share of 29.3% in 2022 (in terms of value). The company sells more than 48 flour products to a wide range of customers both B2B and retail across Saudi through its four production facilities in Jeddah, Qassim, Tabuk and Al-Ahsa. The company also has presence in other regions through sales and distribution warehouses. The company's production facilities have a total flour milling capacity of 4,200 tons/day (c1.35mn tons/annum) and feed mixing capacity of 900 tons/day (c0.29mn tons/annum). Operating rates are expected to improve from 88% in 2021 to reach 95%-97% in the medium term driven by the ongoing operational efficiency measures.

### The future: new products and additional capacities

First Mills growth plans concentrate on strengthening its local presence and increase its customer base. It is also focusing on building exporting capabilities, targeting the MENA region. The company plans to expand its Jeddah facility by 650 tons/day (c0.21mn tons annually, c13% of total capacity) during 2023f-2025f. Mill C will add 250 tons/day in 2023f, Mill A will add 250 tons/day in 2024f and Mill B will add 150 tons/day in 2025f. The company is also planning to develop new facilities to produce Semolina (used in pasta and noodles), which is expected to be launched by end of Q4 23f with a total capacity of c0.096mn tons. This product will use imported wheat and will be sold at market prices to main manufacturing companies. Additionally, First Mills is planning to introduce new products such as Pesa and Mixes in 2023f.

### Revenues to record a CAGR of 5.5% during 2022-2027f

We expect revenues to increase by 4.5% yoy to SAR955mn in 2023f, driven by higher utilization of wheat mills which will offset the impact of lower realized prices of feed and bran. The company is also introducing Mixes and Pesa which are expected to cumulatively contribute c2.5% to the company's topline in 2023f. Going forward, we expect the company to deliver a 5-year revenues CAGR of 5.5% to reach SAR1.19bn by 2027f. We expect flour to remain the main contributor to topline, but its contribution is expected to gradually decline to 54% by 2027f, while we expect Semolina to contribute 6% of revenues in 2024f

and to reach 8% by 2027f. For Mixes and Pesa, we expect their contribution to increase to 3.0% in 2027f to SAR35.6mn.

## Historically stable gross margins

Over the last 4 years (2019-22), First Mills gross margins improved from 31.5% in 2019 to 43.6% in 2022 due to a combination of 1) higher utilization rates, 2) better realized prices of feed and bran and 3) cost efficiencies. In absolute terms, gross profit increased from SAR203mn in 2019 to SAR398mn. During the same period, operating margins increased from 20.9% to 28.0% and EBITDA margins increased from 26.4% to 33.6%. Going forward, we expect gross margins to marginally decline to 43.0% in 2023f, as feed and bran prices normalize. Subsequently, we expect margins to improve to 43.6% in 2024f and to reach 44.8% in 2027f on higher utilization rates and the impact of higher contribution of Mixes and Pesa. We highlight that the introduction of Semolina would partially mitigate margin expansion. In absolute terms, margins to improve and stabilize at c36% by 2027f. We estimate EBITDA to grow at a CAGR of 7.1% during 2022-2027f to reach SAR432mn.

## Net income to record a CAGR of 7.4% during 2022-2027f

In 2022, First Mills recorded a net income growth of 9.6% yoy to SAR217mn driven by higher topline and better margins. The impact was partially offset by higher interest rate expense as the loan was transferred to the company after the merger transaction. Going forward, we expect net income to remain largely flat in 2023f. Overall, we expect profitability to record a 2022-2027f CAGR of 7.4% to reach SAR311mn by 2027f. Accordingly, we expect net margins to expand from 23.8% in 2022 to 26.1% in 2027f.

## Strong working capital management supports cash flow

First Mills cash cycle is largely a function of inventory and account payable. It is worth highlighting that more than 95% the company's sales were in cash during 2019-22. Given the nature of the business, inventory and account payable are subject to fluctuations in global commodity prices (particularly corn and soybean). First Mills cash cycle has considerably improved over the last 4 years, from 90 days in 2019 to 7 days in 2022. This is largely due to corn prices which inflated account payable days. Trade receivable days have remained in the range of 9 to 20 days. Accordingly, we have kept it between 15 to 16 days going forward. Trade payable days averaged at 57 days between 2019-22. We forecast trade payable days to increase slightly to 62 days over our forecast horizon as new products are introduced.

### Deleverage and stable dividends pay-out

Going forward, we believe that the company's robust cash generation will enable it to repay its debt and maintain a healthy dividend payout. As capex requirement is generally moderate, we expect the company to generate an operating cash flow of SAR1.77bn over the next five years (2023f-27f), which is sufficient to meet its capital commitments. We expect the company to generate a FCFF of SAR245mn in 2023f and to grow to SAR391mn by 2027f. For debt, we expect net debt (excluding lease liabilities) to decline from SAR1.17bn in 2022 to SAR1.10bn in 2023f and to reach SAR843mn by 2027f. We believe leverage ratios would remain healthy due to the strong cash generation. We expect Net debt/EBITDA to decrease from 3.1x in 2022 to 2.7x in 2023f and further decline to 0.9x in 2027f. Given a strong cash conversion, we expect the company to maintain a dividend payout of at least 60%. Accordingly, we expect the dividend yield to increase from 2.5% in 2023f to 3.1% in 2027f.

#### **SNB** Capital Investment Ratings

OVERWEIGHT:	Target price represents an increase in the share price in excess of 15% in the next 12 months
NEUTRAL:	Target price represents a change in the share price between -10% and +15% in the next 12 months
UNDERWEIGHT:	Target price represents a fall in share price exceeding 10% in the next 12 months
PRICE TARGET:	Analysts set share price targets for individual companies based on a 12 month horizon. These share price targets are subject to a range of company specific and market risks. Target prices are based on a methodology chosen by the analyst as the best predictor of the share price over the 12 month horizon

#### Other Definitions

- NR: Not Rated. The investment rating has been suspended temporarily. Such suspension is in compliance with applicable regulations and/or in circumstances when SNB Capital is acting in an advisory capacity in a merger or strategic transaction involving the company and in certain other situations
- CS: Coverage Suspended. SNB Capital has suspended coverage of this company
- NC: Not covered. SNB Capital does not cover this company

#### Important information

The authors of this report hereby certify that the views expressed in this document accurately reflect their personal views regarding the securities and companies that are the subject of this document. The authors also certify that neither they nor their respective spouses or dependents (if relevant) hold a beneficial interest in the securities that are the subject of this document. Funds managed by SNB Capital and its subsidiaries for third parties may own the securities that are the subject of this document. SNB Capital or its subsidiaries may own securities in one or more of the aforementioned companies, or funds or in funds managed by third parties The authors of this document may own securities in funds open to the public that invest in the securities mentioned in this document as part of a diversified portfolio over which they have no discretion. The investment banking division of SNB Capital may be in the process of soliciting or executing fee earning mandates for companies that are either the subject of this document.

This document is issued to the person to whom SNB Capital has issued it. This document is intended for general information purposes only, and may not be reproduced or redistributed to any other person. This document is not intended as an offer or solicitation with respect to the purchase or sale of any security. This document is not intended to take into account any investment suitability needs of the recipient. In particular, this document is not customized to the specific investment objectives, financial situation, risk appetite or other needs of any person who may receive this document. SNB Capital strongly advises every potential investor to seek professional legal, accounting, tax and financial guidance when determining whether an investment in a security is appropriate to his or her needs. Any investment recommendations contained in this document take into account both risk and expected return. Information and opinions contained in this document have been compiled or arrived at by the author are from sources believed to be reliable, but SNB Capital has not independently verified the contents of this document and such information may be condensed or incomplete. Accordingly, no representation or warranty, express or implied, is made as to, and no reliance should be placed on the fairness, accuracy, completeness or correctness of the information and opinions contained in this document. To the maximum extent permitted by applicable law and regulation, SNB Capital shall not be liable for any loss that may arise from the use of this document or its contents or otherwise arising in connection therewith. Any financial projections, fair value estimates and statements regarding future prospects contained in this document may not be realized. All opinions and estimates included in this document constitute the author's judgment as of the date of production of this document, and are subject to change without notice. Past performance of any investment is not indicative of future results. The value of securities, the income from them, the prices and currencies of securities, can go down as well as up. An investor may get back less than he or she originally invested. Additionally, fees may apply on investments in securities. Changes in currency rates may have an adverse effect on the value, price or income of a security. No part of this document may be reproduced without the written permission of SNB Capital. Neither this document nor any copy hereof may be distributed in any jurisdiction outside the Kingdom of Saudi Arabia where its distribution may be restricted by law. Persons who receive this document should make themselves aware, of and adhere to, any such restrictions. By accepting this document, the recipient agrees to be bound by the foregoing limitations.

SNB Capital is authorised by the Capital Market Authority of the Kingdom of Saudi Arabia to carry out dealing, as principal and agent, and underwriting, managing, arranging, advising and custody, with respect to securities under licence number 37-06046. The registered office of SNB Capital is at King Saud Road, SNB Regional Building P.O. Box 22216, 11495 Riyadh, Kingdom of Saudi Arabia.

SNB Capital Company, Saudi Joint Stock Company, Paid up capital SAR 1,000 million, authorized by the Capital Market Authority, CR 1010231474, P.O. Box 22216, Riyadh 11495, Kingdom of Saudi Arabia, T:+966 11874 7106, F:+966 11 406 0049, www.alahlicapital.com

#### **Research Disclosures**

#### Third Party Research

This research is prepared by SNB Capital, with headquarters in Riyadh, Saudi Arabia. SNB Capital is authorized to engage in securities according to its domestic legislation. This research is not a product of Tellimer Markets, Inc., a U.S. registered broker-dealer. SNB Capital has sole control over the contents of this research report. Tellimer Markets, Inc. does not exercise any control over the contents of, or the views expressed in, research reports prepared by SNB Capital.

SNB Capital is not registered as a broker-dealer in the United States and, therefore, is not subject to U.S. rules regarding the preparation of research reports and the independence of research analysts. This research report is provided for distribution to "major U.S. institutional investors" and other "U.S. institutional investors" in reliance on the exemption from registration provided by Rule 15a-6 of the U.S. Securities Exchange Act of 1934, as amended (the "Exchange Act").

Any U.S. recipient of this research report wishing to effect any transaction to buy or sell securities or related financial instruments based on the information provided in this research report should do so only through Tellimer Markets, Inc., located at 27<sup>th</sup> Floor, 575 Fifth Avenue, New York, NY 10017. A representative of Tellimer Markets, Inc. is contactable on +1 (212) 551 3480. Tellimer Markets, Inc. accepts responsibility for the contents of this research report, subject to the terms set out below, to the extent that it is delivered to a U.S. person including major U.S. institutional investors.

None of the materials provided in this report may be used, reproduced, or transmitted, in any form or by any means, electronic or mechanical, including recording or the use of any information storage and retrieval system, without written permission from Tellimer and SNB Capital.

SNB Capital is the employer of the research analyst(s) responsible for the content of this report and research analysts preparing this report are resident outside the U.S. and are not associated persons of any U.S. regulated broker-dealer. The analyst whose name appears in this research report is not registered or qualified as a research analyst with the Financial Industry Regulatory Authority ("FINRA") and may not be an associated person of Tellimer Markets, Inc. and, therefore, may not be subject to applicable restrictions under FINRA Rules on communications with a subject company, public appearances and trading securities held by a research analyst account.

Tellimer Markets, Inc. or its affiliates has not managed or co-managed a public offering of securities for the subject company in the past 12 months, has not received compensation for investment banking services from the subject company in the past 12 months, and does not expect to receive or intend to seek compensation for investment banking services from the subject company in the next three months. Tellimer Markets, Inc. has never owned any class of equity securities of the subject company. There are no other actual, or potential, material conflicts of interest of Tellimer Markets, Inc. at the time of the publication of this report. As of the publication of this report, Tellimer Markets, Inc. does not make a market in the subject securities.

#### About Tellimer

Tellimer is a registered trade mark of Exotix Partners LLP. Exotix Partners LLP and its subsidiaries ("Tellimer") provide specialist investment banking services to trading professionals in the wholesale markets. Tellimer draws together liquidity and matches buyers and sellers so that deals can be executed by its customers. Tellimer may at any time, hold a trading position in the securities and financial instruments discussed in this report. Tellimer has procedures in place to identify and manage any potential conflicts of interests that arise in connection with its research. A copy of Tellimer's conflict of interest policy is available at <a href="https://www.tellimer.com/regulatory-information">www.tellimer.com/regulatory-information</a> .

#### Distribution

This report is not intended for distribution to the public and may not be reproduced, redistributed or published, in whole or in part, for any purpose without the written permission of Tellimer. Tellimer shall accept no liability whatsoever for the actions of third parties in this respect. This report is for distribution only under such circumstances as may be permitted by applicable law.

This report may not be used to create any financial instruments or products or any indices. Neither Tellimer and SNB Capital, nor its members, directors, representatives, or employees accept any liability for any direct or consequential loss or damage arising out of the use of all or any part of the information herein.

United Kingdom: Distributed by Exotix Partners LLP only to Eligible Counterparties or Professional Clients (as defined in the FCA Handbook). The information herein does not apply to, and should not be relied upon by, Retail Clients (as defined in the FCA Handbook); neither the FCA's protection rules nor compensation scheme may be applied.

UAE: Distributed in the Dubai International Financial Centre by Exotix Partners LLP (Dubai) which is regulated by the Dubai Financial Services Authority ("DFSA"). Material is intended only for persons who meet the criteria for Professional Clients under the Rules of the DFSA and no other person should act upon it.

Other distribution: The distribution of this report in other jurisdictions may be restricted by law and persons into whose possession this document comes should inform themselves about, and observe, any such restriction.

#### Disclaimers

Tellimer and/or its members, directors or employees may have interests, or long or short positions, and may at any time make purchases or sales as a principal or agent of the securities referred to herein. Tellimer may rely on information barriers, such as "Chinese Walls" to control the flow of information within the areas, units, divisions, groups of Tellimer.

Investing in any non-U.S. securities or related financial instruments (including ADRs) discussed in this report may present certain risks. The securities of non-U.S. issuers may not be registered with, or be subject to the regulations of, the U.S. Securities and Exchange Commission. Information on such non-U.S. securities or related financial instruments may be limited. Foreign companies may not be subject to audit and reporting standards and regulatory requirements comparable to those in effect within the United States. The value of any investment or income from any securities or related financial instruments discussed in this report denominated in a currency other than U.S. dollars is subject to exchange rate fluctuations that may have a positive or adverse effect on the value of or income from such securities or related financial instruments.

Frontier and Emerging Market laws and regulations governing investments in securities markets may not be sufficiently developed or may be subject to inconsistent or arbitrary interpretation or application. Frontier and Emerging Market securities are often not issued in physical form and registration of ownership may not be subject to a centralised system. Registration of ownership of certain types of securities may not be subject to standardised procedures and may even be effected on an ad hoc basis. The value of investments in Frontier and Emerging Market securities may also be affected by fluctuations in available currency rates and exchange control regulations. Not all of these or other risks associated with the relevant company, market or instrument which are the subject matter of the report are necessarily considered.