

Report of the 15<sup>th</sup> A2ii – IAIS Consultation Call

# Proportionate Approaches to the Supervision of Intermediaries

31 March 2016



*The A2ii consultation calls are organised in partnership with the IAIS to provide supervisors a platform to exchange experiences and lessons learned in expanding access to insurance.*

**The 15th consultation call, held on 31 March 2016, was focused on proportionate approaches to the supervision of intermediaries and the challenges faced by supervisors in implementing such approaches.**

Four calls were held: two in English, one in French, and one in Spanish. Technical inputs were provided by Michael Hafeman (actuary and independent international consultant) on the English calls, and by Andrea Camargo (Director of Regulation and Consumer Protection of the Microinsurance Catastrophe Risk Organisation - MiCRO) on the French and Spanish calls. Luciana Mateus (Superintendência de Seguros Privados (SUSEP), Brazil) and Rosalina Bactol (Insurance Commission, the Philippines) shared their experiences in regulating different types of intermediaries in their respective jurisdictions.

## Insurance intermediaries

Intermediaries are an important distribution channel used by insurers. They occupy the space between customers and insurers, which gives them a key role in building public trust and confidence in the insurance sector – particularly through their conduct and competence. Intermediaries can also promote consumer protection and financial awareness by assisting customers to make better-informed decisions about products that they buy. However, intermediaries themselves may also give rise to risks. It is therefore important that intermediaries possess the appropriate levels of skill, care and due diligence, apply adequate and appropriate governance, and are subject to regulatory standards. Appropriate supervision is needed to balance the potential benefits of intermediaries with the risks arising from them.

### **Focus: A2ii and IAIS resources on supervising intermediaries in the inclusive insurance market**

The IAIS has recognised the importance of intermediaries and their supervision, and deals with the topic in a number of documents.

[Insurance Core Principle \(ICP\) 18 Intermediaries](#) requires that supervisors ensure that intermediaries are licensed and subject to ongoing review (standards 18.1 and 18.2, respectively). The ICP recognises that this goal can be achieved in different ways, namely either through a direct or indirect approach to supervision. The indirect approach is a means of supervision where intermediaries are supervised indirectly through the supervision of the insurers. However, it is emphasised that where an indirect approach is taken, the supervisor still has the responsibility to ensure that the intermediary is appropriately supervised.

[ICP 19 Conduct of Business](#) stipulates that the supervisor sets requirements for the conduct of the business of insurance to ensure that customers are treated fairly, both before a contract is entered into and through to the point at which all obligations under a contract have been satisfied. Whereas ICP 18 focuses on intermediaries specifically, ICP 19 is relevant to the conduct of business of both insurers and intermediaries. Both ICPs are relevant for both conventional and inclusive insurance markets.

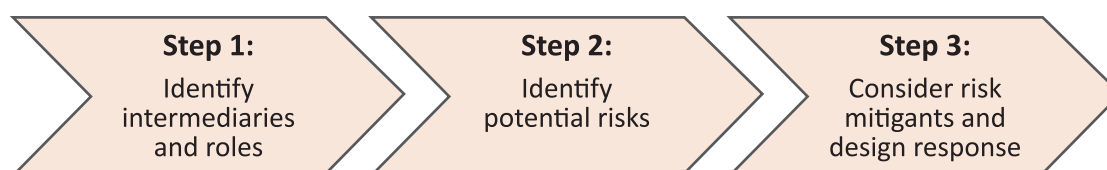
With respect to inclusive insurance markets, the [Application Paper on Regulation and Supervision supporting Inclusive Insurance Markets](#) recognises that innovative approaches may be needed to enhance access to insurance, particularly with respect to distribution channels. In this regard, the paper recommends that the primary law facilitates a wide range of forms of intermediation, and supervisory rules that are established cover the functional details for each permissible form of intermediary.

The issues and challenges for supervisors associated with a wide range of intermediaries for inclusive insurance are further explored in the [Issues Paper on Conduct of Business in Inclusive Insurance](#). The issues paper highlights that, in inclusive insurance markets, the fair treatment of customers is very important, as the customers in these markets are particularly vulnerable.

In addition, and with a broader focus than just inclusive insurance markets, the IAIS, through its Market Conduct Working Group, has started to work on [an Issues Paper](#) to provide guidance to IAIS members on approaches to consider in the conduct of business risk management, including in the implementation of ICP 19 on Conduct of Business and ICP 18 on Intermediaries. At the time of writing, the working group is reviewing comments on the first draft of this document.

In July 2016, the IAIS also issued a consultation draft of an [Application Paper on Approaches to Supervising the Conduct of Intermediaries](#), which discusses approaches that IAIS members may wish to consider when developing or revising their supervisory regimes for the supervision of intermediaries and implementing ICP 19 on Conduct of Business and ICP 18 on Intermediaries in their supervisory frameworks.

## Proportionate approaches to regulating and supervising intermediaries in inclusive insurance markets



The figure above shows the three steps necessary to achieve proportionate and appropriate regulation and supervision of intermediaries, specifically in inclusive insurance markets. The starting point for these steps is to achieve a broad overview of the market, including all intermediaries in the market and the differences in the activities they undertake. From there, the supervisor must go further in investigating the specific roles of intermediaries within their respective business models and the risks associated with their different activities. After understanding the context of these risks in the market, appropriate regulation and supervision should be designed.

The following provides guidance to the supervisor on what to consider in each step of the process highlighted above.

## Step 1: Develop knowledge of the business

In order to develop an appropriate proportionate supervisory approach to intermediaries, there are some basic, risk-focused questions that a supervisor must ask about the market. In order to ask and answer these questions, it is important for the supervisor to first understand the business:

- Which products are available in the market?
- Which products are available to whom?
- What are the characteristics of the different target customers?
- What business models are being used to deliver the products to the target customers<sup>1</sup>?
- Who are the intermediaries involved in these business models?
- What roles do these intermediaries play in these business models?

In comparison to conventional insurance, inclusive insurance business models usually have more diverse and a higher number of intermediaries along the insurance value chain. It is also common for aggregators<sup>2</sup> to be involved. Such intermediaries do not always focus only on traditional roles, such as sales and marketing. Depending on the business model, the following roles might be undertaken by the various intermediaries:

- Underwriting
- Administration
- Product development<sup>3</sup>
- Marketing
- Sales
- Premium collection

Regulatory focus should be on the most significant risks. As such, it is important to understand the different roles in order to gain an appreciation of which activities might create risks and require regulation, and then determine an appropriate regulatory approach to the supervision of intermediaries.

## Step 2: Identify potential risks

Risks arising from the activities of intermediaries could affect the insurer, the client or both. There are two key questions to note when considering such potential risks:

- What are the risks generated by the activities of the intermediaries?
- What might increase risks related to intermediaries in *inclusive* insurance?

<sup>1</sup> An analysis by the A2ii of inclusive insurance providers, products and channels across 25 countries identified eight different business models. A summary of these business models and their arising risks can be found in the A2ii Technical Note [Evolving microinsurance business models and their regulatory implications](#) or Section 2.3 of the [Issues Paper on Conduct of Business in Inclusive Insurance](#).

<sup>2</sup> Aggregators are organisations that group a critical mass of people, typically for a purpose that was originally unrelated to insurance. Examples are agricultural cooperatives, social organisations, supermarkets, utilities or mobile network operators. Their roles and activities in a business model vary depending on the relationship they have with their customers or members. For example, aggregators can operate as mass merchandisers or collective decision-makers on behalf of their members. As such, they are often in a good position to offer their customers or members access to insurance.

<sup>3</sup> Intermediaries are traditionally not involved in product development, but increasingly there are instances where this happens, such as where aggregators or third-party service providers are involved. Examples include mobile network operators or microinsurance brokers.

To answer the first question, it is important to take into account the entire product lifecycle<sup>4</sup> based on a functional activity approach. This means investigating the activities of the intermediaries rather than judging from the type or title of the intermediary. Their activities will not always be immediately clear from their titles, and a single intermediary could be involved in multiple aspects of the cycle. At each point of the cycle, consider what risks each activity poses; what the intermediaries do to deal with these risks; and whether this is adequate.

For the second question, it is important to note that *different* types and degrees of risks arise in inclusive insurance markets compared to conventional insurance markets. The difference arises largely from distribution-related factors, specifically from the following:

- **Multiplicity of parties.** In the inclusive insurance market, the insurance value chain is often more diverse than in the conventional market. There are typically more parties involved than just the insurer, agent and broker.
- **Levels of skills and competence.** This might vary significantly. Some intermediaries are involved in the insurance business full-time. These are more likely to have been licensed by the supervisor, and therefore also tested on their competence. On the other hand, other intermediaries might only be working in insurance part-time, and therefore have a lower level of competence.
- **Interests of intermediaries.** These do not always align with those of the consumers. Some intermediaries may see insurance as a source of additional revenue to their core business, such as in the case of airtime-linked mobile microinsurance models. In these cases, meeting the insurance needs of the customer is not their fundamental goal. In contrast, an agricultural cooperative that sells insurance only to its members, and has a broader interest in its members beyond insurance, is more likely to align with consumer interests.
- **Relative bargaining power of parties.** Bargaining power does not always lie with the insurer. In cases where the intermediary is large, has a large customer base and exerts strong control over this customer base, intermediaries may dictate the terms of agreement to insurers, instead of vice versa. This is exemplified in some instances of mobile network operators in mobile microinsurance business models.
- **Potential impact on costs and reputation.** The higher the number of parties in the value chain, the higher the number of parties that require payment for their services, and also the greater and the more unpredictable the risk of reputational damage to the insurer (or even the insurance sector as a whole).

### Step 3: Consider potential risk mitigants and design response

Having achieved an understanding of the business and where its risks lie, the supervisor is now ready to consider how to deal with these risks. This will always involve balancing various interests such as consumer protection, market development for inclusive insurance, and not wanting to over-regulate the market to an extent that it is too onerous for inclusive insurers to enter.

#### Potential risk mitigants, not limited to regulation and supervision

There are various mechanisms through which potential risks in the inclusive insurance business can be mitigated. Some of them might already exist in the insurance sector of a particular jurisdiction, at one or both of the following levels:

<sup>4</sup> The product lifecycle includes the following phases: product development; product distribution; disclosure of information; customer acceptance; premium collection; claims settlement; and complaints handling. See Section 3 of the [Issues Paper on Conduct of Business in Inclusive Insurance](#).

- Country level:
  - Regulatory framework;
  - Consumer protection mechanisms;
  - Industry and other associations; and
  - Courts.
  
- Business controls:
  - Corporate governance;
  - Internal business controls; and
  - Accountability of intermediaries to others, for example to the Board of Directors or industry bodies where good behaviour is required to maintain membership.

It is important to note that not all of these mechanisms fall directly under the responsibilities of the supervisor. However, it is good for the supervisor to consider as broad a range of potential mitigants as possible, in order to gain an understanding of the remaining risks that might require supervisory action. It also helps supervisors to identify other parties and government bodies that might be involved, and that they might cooperate with.

#### **Risk mitigants to be undertaken by the insurance supervisor**

Broadly, there are two categories of actions a supervisor might undertake in making the activities surrounding intermediaries less risky: *regulation or supervision*. The different types of activities under these categories are highlighted in the table below. Regulation relates to the overall framework of rules and requirements imposed, while supervision concerns the ongoing review, reporting, monitoring, enforcement or intervention aspects.

In considering the actions that a supervisor might take to mitigate the potential intermediary-related risks, it is important to take a proportionate approach, i.e., determine the steps that would be *least intrusive* relative to the extent of risk.

“ *In taking a proportionate approach, the key is to do as little as one can, while still reducing risks to acceptable levels. Don't overdo it.* ”  
Michael Hafeman

Regulation	
<b>Licensing</b>	<p><i>Identify the parties subject to licensing.</i> May depend on the type of intermediary, or the activities undertaken, or both.</p> <hr/> <p><i>Licensing requirements.</i> What must an intermediary comply with in order to obtain the license?</p> <hr/> <p><i>Permitted roles.</i> What does a license permit an intermediary to do, and what not?</p>
<b>Responsibilities and accountabilities</b>	What should an intermediary be required to do for the supervisor to ensure the intermediary plays its role properly? Examples are record-keeping and disclosure.
<b>Simplicity</b>	Contract and product wordings are easy to explain and read.
Supervision	
<b>Monitoring and inspection</b>	The insurance supervisor monitors intermediaries directly, e.g. via mystery shopping, onsite inspections, or, where appropriate, auditing.
<b>Delegation of oversight</b>	A form of indirect monitoring. Insurers are made responsible for monitoring, supervising and reporting on their intermediaries. The insurance supervisor monitors the insurers and assesses the effectiveness of their oversight.
<b>Cooperation with other authorities</b>	The insurance supervisor could cooperate with, for example, the microfinance or telecommunications supervisors.
<b>Intervention</b>	The mechanism depends on the type of issue that arises and the party causing the issue.

## Summary

### Focus: Recap of key considerations when developing proportionate approaches to supervising intermediaries in inclusive insurance markets

- **Understand the business.** Who are the intermediaries and what roles do they play within the business model?
- **Understand the risks.** What are the risks generated by the activities of the intermediaries?
- **Consider potential mitigants.** What existing features of the system might already help to mitigate the risks?
- **Develop regulatory and supervisory frameworks.** What are the least intrusive additional steps that can be taken to reduce the risks to acceptable levels?

The three-step process set out above (Identify intermediaries and roles; Identify potential risks; Consider risk mitigants and design response) provides an overview of the key considerations for a supervisor in determining a proportionate approach to regulating intermediaries in inclusive insurance markets. It is important to gain a holistic understanding of the market and its actors, and to move through all three steps thoroughly.

The most important understanding to gain from this process is that *different* regulatory approaches are appropriate, given *different* risks arising from *different* business environments, in which *different* types of actors are present. Considering the context in a thorough manner is essential to achieving an understanding of an appropriate course of action for the regulator.

## Country experiences

The following are the experiences of the insurance supervisory authorities in Brazil and the Philippines in developing proportionate approaches to regulating and supervising intermediaries in inclusive insurance markets.

### Country Experience: Brazil

*SUSEP, or the Superintendent of Private Insurance, is the insurance supervisor in Brazil. This federal agency is directly linked to the Ministry of Finance, and its responsibilities are the supervision and control of insurance, reinsurance, open private pension funds and intermediaries. A Consultative Commission on Microinsurance was set up, led by SUSEP and including representatives from both the public and the private sectors. The purpose of this commission was to identify what might be done to foster suitable conditions for further development of microinsurance in Brazil. Luciana Mateus presented an overview of the results during the consultation call.*

The commission analysed the intermediaries or distribution channels currently available to insurers, and, in parallel, the regulations pertaining to these intermediaries. The analysis focused on 7 types of distribution channels in particular: brokers, churches, cooperatives, 'estipulantes' (group policies), banks, department stores/retailers, and public utility providers.

- Insurance brokers are required to register with SUSEP; and
- Other distribution channels do not have to register with SUSEP, but they are required to comply with the rules set by SUSEP. SUSEP is also able to take enforcement measures against the distribution channel if consumer protection issues arise.

The analysis concluded that, as a whole, the corresponding regulations were flexible enough to accommodate these distribution channels. A notable positive aspect was that the regulation already allowed for the creation of microinsurance brokers, intermediaries that operate locally in the community. It was found that such intermediaries are important in Brazil's cultural context as clients are more comfortable buying microinsurance from people they know.

In terms of enhancements, banking correspondents were identified as a new potential intermediary. Banking correspondents are local merchants, post offices and lottery outlets that distribute financial services on behalf of banks. More than 130,000 banking correspondents were already present in more than 5,000 municipalities in the country. However, at the time of the study, they were not licensed to distribute insurance.

Thus, to fill this gap, SUSEP issued a number of circulars, creating or refining the following types of microinsurance intermediaries:

- *Bank Correspondent (SUSEP Circular 441/2012)*. This circular allowed the existing bank correspondents to add microinsurance to their portfolio of services: they may now sell microinsurance, receive premiums, and pay out claims.



- *Microinsurance Correspondent (SUSEP Circular 442/2012)*. This circular led to the creation of microinsurance correspondents, an intermediary that is similar to a bank correspondent. A microinsurance correspondent must also be a legal person. A distinction is that their contracts are with insurers directly, rather than with banks.
- *Microinsurance Broker (SUSEP Circular 443/2012)*. Microinsurance brokers are individuals who may only deal with microinsurance. The circular concerned the minimum requirements and proportionate technical training that microinsurance brokers must undergo in order to meet qualification requirements.
- *Insurance Representative (CNSP Resolution 297/2013 – SUSEP Circular 480/2013 (Ex: Retailers))*. An insurance representative must also be a legal person. It is similar to a microinsurance correspondent except that they are authorised to sell other insurance lines beyond microinsurance (See the Questions and Discussions section for more details). The circular concerned consumer protection issues.

Another aspect is that the new legislation set minimum requirements for microinsurance intermediaries. Insurers need to enter into operational agreements with their intermediaries according to SUSEP rules and those agreements must be made available to SUSEP. Insurers also have to electronically submit a list of the intermediaries that they work with to SUSEP once a year.

The issuance of these circulars has helped to create more transparency in the market and strengthen consumer protection. An identified potential area for growth was to increase the number of registered microinsurance brokers. There are currently very few registered microinsurance brokers (less than 15) and SUSEP plans to undertake steps to increase their number in the near future.

## Country Experience: Philippines

*The Insurance Commission of the Philippines undertook a mapping exercise of the different types of intermediaries in its jurisdiction. During the consultation call, Rosalina Bactol of the Insurance Commission provided an overview of the different types of intermediaries found in the Philippines.*

In the Philippines, the Insurance Commission identified two broad categories of delivery mechanisms for microinsurance:

**Licensed** delivery channels. These comprise both direct sales and intermediaries:

- *Direct sales by licensed insurers and Mutual Benefit Associations (MBAs)\**
- *Intermediaries (agents and brokers) – see table below*
- *Alternative distribution channels, such as mobile network operators, pawnshops, rural banks, cooperatives*

**Unlicensed** delivery channels. These are only intermediaries:

- *Community-based schemes* – Not connected to formal insurers in any way, but rather community self-help in case of mishaps.
- *Microfinance institutions/cooperatives* – Not officially licensed to provide insurance, but have in practice been doing so nevertheless.
- *NGOs*

There are **three different types of licensed agents/brokers**. All three sell insurance, but differ in number and complexity of activities.

**GREATER RESPONSIBILITY** 

	<b>Regular Agent</b>	<b>General Agent</b>	<b>Broker</b>
<b>Form</b>	Individual person	Individual person or entity	Individual person or entity
<b>Representation</b>	Insurance entity	Insurance entities	Clients
<b>Number of insurance partners</b>	<ul style="list-style-type: none"> <li>• Life: One company</li> <li>• Non-life: up to seven companies</li> </ul>	No limits	No limits
<b>May design products</b>	No	In collaboration with insurer	Yes, but products are approved and underwritten by insurer
<b>Business plan development</b>	No	Yes	Yes
<b>Evaluation of risk</b>	No	No	Yes
<b>Administration</b>	Document processing only	Yes	Yes
<b>Selling</b>	Yes	Yes	Yes
<b>Claims</b>	Documentation only	<ul style="list-style-type: none"> <li>• Documentation and evaluation</li> <li>• Claim payments if authorised by insurer</li> </ul>	<ul style="list-style-type: none"> <li>• Documentation and evaluation</li> <li>• Claim payments if authorised by insurer</li> </ul>
<b>Use of sub-distribution channels</b>	No	Yes, with requirements on the qualification of sub-agents	Yes, with requirements on the qualification of sub-agents

Notable key differences between the intermediaries identified above are as follows:

- **Regular agents** are individual persons, whereas **general agents** may be either entities or individual persons.
- **Brokers** are the only intermediaries involved in product design. While they cannot underwrite products themselves, they may design products and send them to the insurers for approval. In such a case, the product might also be provided exclusively by the designing broker.
- **Regular agents** are not allowed to use sub-distribution channels, meaning they cannot outsource the actual sale to any other person. The person making the sale has to be the agent in person, while **general agents** and **brokers** may employ people underneath them and thus put in place sub-distribution channels, potentially widening their reach.

Following the completion of market analysis, the regulator is considering the possibility of licensing unlicensed delivery channels.

*\* An MBA is a non-profit society, association or corporation formed mainly for the purpose of paying benefits or furnishing financial support to its members in the event of illness, unemployment or death. It is defined in Sec. 390 of [the Insurance Code](#) and licensed by the Insurance Commission. As such, it is allowed by regulation to act as risk carriers and distribute their products directly to their members. This provision has been instrumental to the development of the microinsurance market in the Philippines. MBAs are the main providers of microinsurance products in the country.*

## Questions and Discussion

**?** *Regarding intermediaries, what is the biggest difference between the conventional and inclusive insurance markets?* The range of intermediaries found in conventional insurance markets is more consistent across jurisdictions. On the other hand, the diversity of intermediaries in inclusive insurance markets can vary considerably across countries – both in terms of types of intermediaries, and in the activities they undertake. To illustrate: In Southern Africa, funeral parlours are a common intermediary, where they are active in sales and sometimes even underwrite the insurance policies – whereas in East Africa, mobile network operators are the most common intermediary, and act as distributors and collectors of premiums. However, there are also cases where intermediaries for conventional and inclusive markets converge. In Brazil, insurance brokers are allowed to sell microinsurance. Other types of traditional intermediaries can sell microinsurance only if they act in the capacity of a microinsurance correspondent, bank correspondent or insurance representative. However, it is often found that such traditional intermediaries are not interested in microinsurance. In contrast, non-traditional intermediaries typically know their customers' needs and peculiarities better, in which case they are in a good position to design a suitable product that customers are also likelier to buy.

**?** *What are the most common roles fulfilled by intermediaries in inclusive insurance markets?* This depends on the type of organisation that the intermediary is. If the core business of the intermediary is not insurance (such as in the case of a mobile network operator), they commonly take on the role of premium collections as they usually have the infrastructure to do so. If the intermediary is mainly a members-based organisation, such as a cooperative, it is more likely to be involved in consumer education and actively assist with administrative processes such as premiums collection and claims.

**? In the Philippines, there are microfinance institutions that act as microinsurance intermediaries. These are unsupervised by the Insurance Commission. How does the Insurance Commission manage the arising risk?** Some of their activities might be supervised by the relevant supervisors (such as the microfinance institution or telecommunications supervisors). However, this does not cover their insurance activities. The Philippines is aiming at formalising these delivery channels by bringing them into the licensed space in the future. As a general principle however, it is important for the insurance supervisor to hold regular dialogue with supervisors from other sectors that regulate the intermediaries involved in the business model. It is also important that insurers are responsible for the intermediaries they work with, and that there is adequate reporting from these intermediaries.

**? What is the difference between the microinsurance correspondent and the insurance representative in Brazil?** These two types of distribution channels are quite similar. For instance, both (i) must be legal persons; (ii) have to enter into a contract (operational agreement) with the insurer; (iii) can sell insurance contracts; (iv) can act on behalf the insurer in respect of collection of premiums and payment of pay-outs; (v) are not allowed to require purchase of their own products as a precondition to purchase the insurance product; (vi) have to keep records of the complaints against themselves; and (vii) can be subject to onsite inspections by SUSEP.

The key differences are: (i) the microinsurance correspondent is allowed to sell only microinsurance products, whereas the insurance representative can sell other types of insurance products besides microinsurance products; (ii) an insurer assumes directly and completely any wrongdoing of the microinsurance correspondent, whereas the insurance representative and the insurer have joint and several liability; and (iii) there is no explicit requirement to have a cooling off period for products purchased through a microinsurance correspondent, while in respect of an insurance representative, a cooling off period of 7 days is applicable.

**? How should a supervisor take on the ongoing supervision of intermediaries, particularly with respect to corporate governance and reporting requirements?** The supervisor must decide for either direct or indirect supervision. Large intermediaries, involved in large numbers of insurance activities, should be supervised directly. This would include inspection of strategy, risk management practices, internal controls, and even onsite inspections. Smaller intermediaries, or those that perform insurance activities as side activities to their main business, may be supervised either directly or indirectly. In the case of direct supervision, supervision should be directed at the particular issue that the supervisor finds critical. It might also be more efficient to supervise the intermediaries indirectly by making the insurers responsible for keeping oversight over them.

**? What are some examples of supervisory approaches to training for intermediaries operating in the inclusive insurance market?** Examples of proportionate training requirements can be found in India and the Philippines, where training for microinsurance intermediaries is proportionately simpler and subject to a reduced number of hours compared to conventional insurance. The purpose was to prevent the cost of training from being a barrier to the insurers and intermediaries in entering the inclusive market. In Brazil, the School of Insurance is responsible for training agents and brokers specific to microinsurance.

**? How should the supervisor deal proportionately with intermediaries that sell insurance to corporate clients, rather than more vulnerable individual clients?** Commonly, insurance sold to individuals is more heavily regulated than insurance sold to corporate clients. This is not necessarily proportionate, since a corporate client, even one that deals regularly with financial issues, does not inherently have a better understanding of insurance – particularly if it is a complex product. As a whole, the supervisor should base the level of supervision and regulation on the complexity of the product, as well as whether the corporate client is able to understand the product and assess if it meets their insurance needs. If the client is able to do so, there might not be a need to regulate so closely.



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