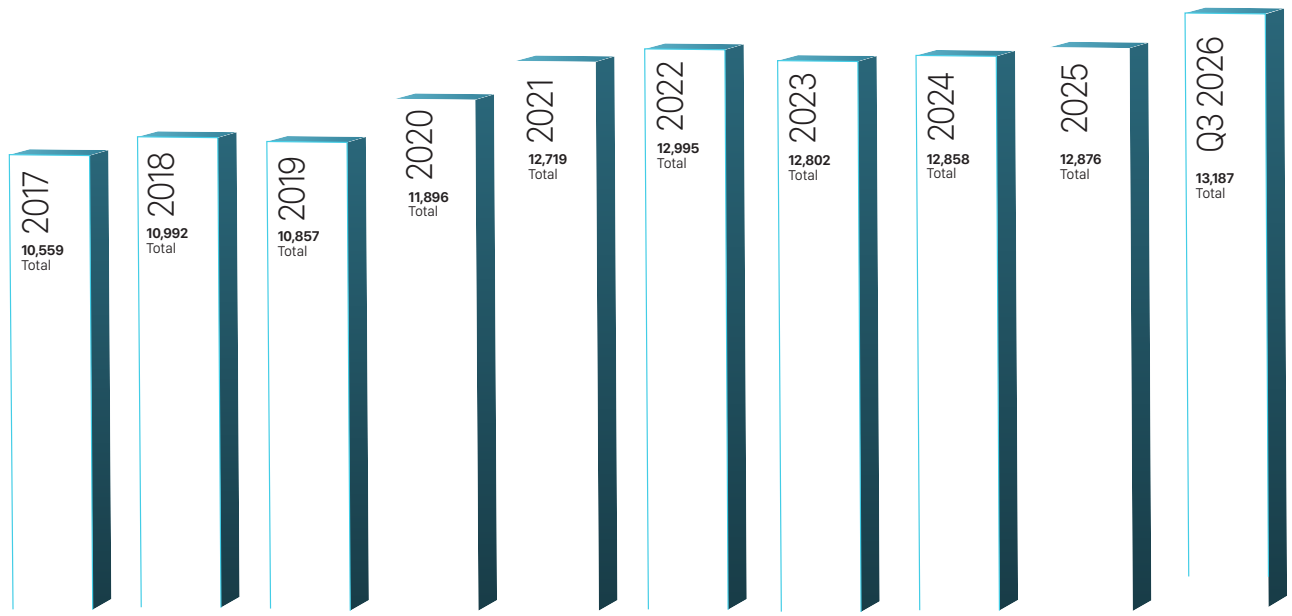
MAPLES GROUP

Open-Ended Funds Report

Q3 I 2026

The Maples Group acts for approximately one third of all mutual funds registered with the Cayman Islands Monetary Authority ("CIMA"). This report summarises data in respect of open-ended funds launched by the Maples Group during the period from 1 July 2026 to 30 September 2026.

The number of mutual funds registered or licensed with CIMA continues to rise, with the total number of mutual funds increasing during each quarter of 2026. CIMA reported that 13,187 mutual funds were registered with, or licensed by, CIMA as at the end of Q3 2026 surpassing the previous figures reported as at the end of both Q1 2026 and Q2 2026.[1]



[1] *https://www.cima.ky/investment-statistics*

Structuring, Corporate Governance and Outsourced AML Functions

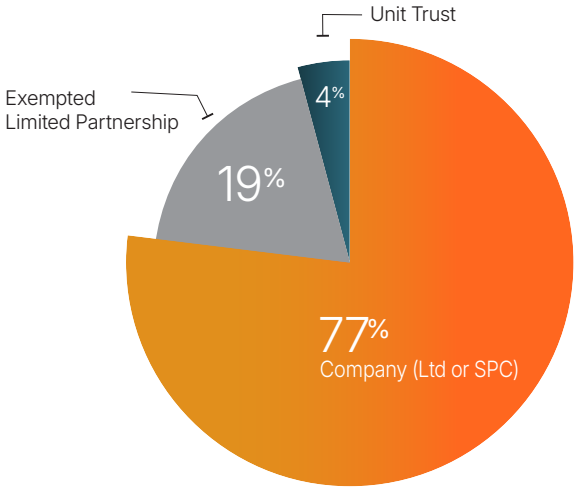
The financial year-end is a key point in the governance calendar for the governing bodies and managers of investment funds. As year-end approaches, it is a good moment to consider how governance arrangements are evolving in practice. This quarter's report assesses the preferred structures for Cayman Islands open-ended investment funds, the composition of their governing bodies and the prevalence of outsourced independent anti-money laundering ("AML") officers.

Preferred Fund Structure

The choice of fund structure is driven by a number of factors, including regulatory and jurisdictional considerations, liquidity, investment strategy and investor preference.

Corporate structures remained the most popular structuring option for Cayman Islands open-ended funds launched by the Maples Group in Q3 2026. Exempted companies and segregated portfolio companies accounted for approximately 77% of such funds, reflecting their familiarity among managers and investors. Exempted limited partnerships represented approximately 19% of such funds, while only 4% were structured as unit trusts.

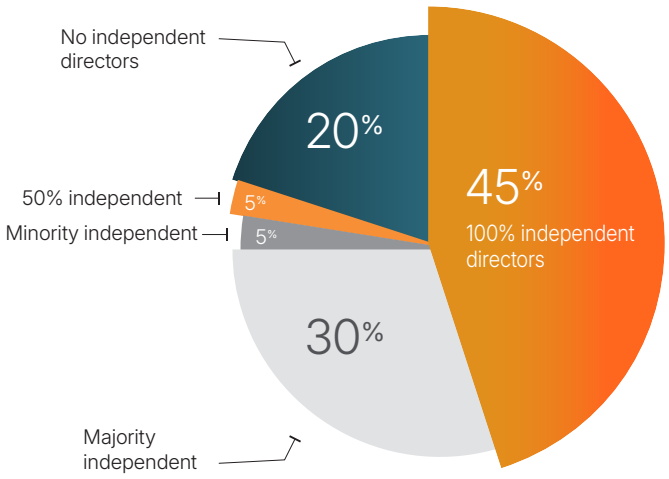
Fund Vehicle Type



Governing Body

Independent oversight remains a prominent feature of Cayman Islands investment funds. The "governing body" of a corporate fund (e.g. the board of directors) retains ultimate responsibility for the fund's compliance programme. Of the corporate open-ended funds launched by the Maples Group in Q3 2026, 45% had boards comprised entirely of independent directors, and a further 30% had a majority of independent directors. Collectively, 75% of corporate funds had all or a majority of independent directors, indicating managers have a strong preference for appointing external directors, who bring objective oversight as well as board-level experience and expertise. At the other end of the spectrum, 20% of corporate funds had no independent directors appointed, with managers preferring to appoint their own personnel to the board. This approach can offer specialist expertise, detailed knowledge of the business and practical efficiencies, but can also present certain conflicts that need to be carefully managed. The remaining 5% of corporate funds had boards comprised either of 50% independent directors or a minority of independent directors. This range of boards compositions shows that managers are tailoring boards to suit the governance needs of individual funds.

Board Independence

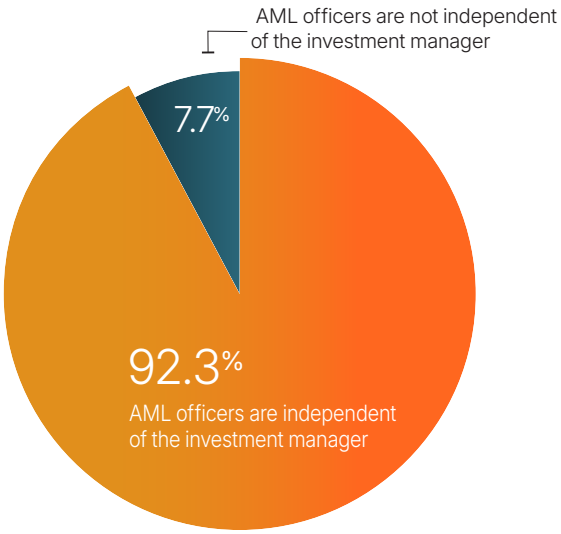


AML Officer Independence

Of the funds launched in Q3 2026, 92.3% appointed AML officers who were all independent of the investment manager, with only 7.7% appointing AML officers who were not independent of the investment manager. This reflects a strong industry preference for outsourcing the provision of AML officers to third-party service providers such as fund administrators, corporate service providers or specialist AML firms.

All of the funds surveyed had AML officers who were independent of the fund's "governing body", which reflects standard practice for investment funds registered with CIMA, and is particularly timely given the recently published Rule on Effective Compliance Programme for the Prevention and Detection of Money Laundering, Terrorist Financing and Proliferation Financing for Financial Services Providers (the "Rule") which came into effect on 18 September 2026, and requires the AML Compliance Officer to be independent of a fund's "governing body". Further details in relation to the Rule can be found in Maples' AML Update.

Independence of AML Officers



Trends: Old and New

The investment funds industry has changed markedly over recent decades. Competition for capital and talent, greater investor scrutiny and shifting regulation have prompted managers to rethink how funds are structured, how they are run and how their costs are borne. This is particularly the case when considering the prevalence of pass-through expenses and the use of artificial intelligence ("AI") in the investment process.

Pass-Through Expenses

Arrangements once seen as niche or unconventional, such as the pass-through expense model first adopted by a small number of multi-manager platforms, have in some cases become an established feature of the market. Approximately 13.5% of funds launched by the Maples Group in Q3 2026 charged pass-through expenses (being costs the manager incurs but charges directly to the fund, and ultimately to investors, rather than paying out of its management fee). Of those funds, 71.4% also charged both a management fee and a performance fee, while approximately 28.6% charged a performance fee only.

> ***13.5%** of funds surveyed charged pass-through expenses*

Fee Arrangements of Funds Charging Pass-Through Expenses



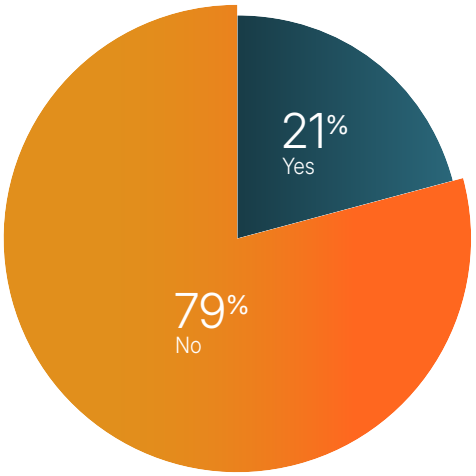
AI in the Investment Process

AI is becoming a more prevalent feature of the investment approaches of new open-ended funds and is no longer confined to quantitative funds; AI tools can now provide advanced research capabilities to a wide range of managers, including discretionary equity managers, credit specialists and macro traders.[2]

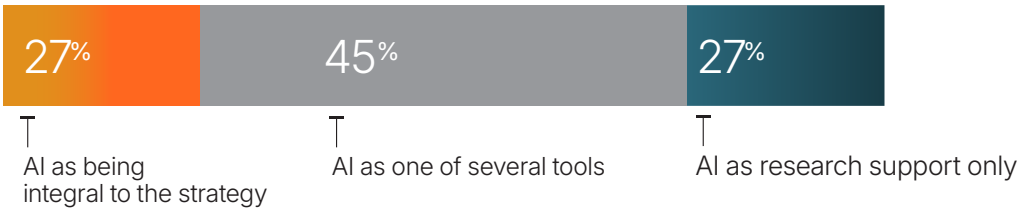
Approximately 21% of funds launched by the Maples Group in Q3 2026 disclosed the use of AI, generative AI or machine learning in their investment processes. Whilst the depth of disclosure relating to, and the use of, AI, generative AI or machine learning varied considerably, these technologies continue to feature in the investment approach of new funds. Of those funds, approximately 27% placed AI at the heart of their investment strategy, 45% deployed it as one of several instruments or tools, and 27% used it for research support only. We expect related disclosure and governance considerations to receive increasing attention from boards and investors as managers continue to integrate these technologies into their investment processes.

Clear disclosures in offering documents and oversight by the governing body are cornerstones of the effective integration of any new AI, generative AI or machine learning model or process.

Proportion of Funds Disclosing Use of AI



Role of AI in the Investment Process of Funds Disclosing the Use of AI



[2] *Opalesque for New Managers, How AI is changing the hedge fund investment process.*