

ALTER DOMUS UNITED KINGDOM

# On-the-ground support for UK clients, investments and structures

Alter Domus UK and its dedicated team of alternative asset specialists provide clients with a complete range of fund administration, corporate services and debt capital market solutions.

The UK uses an accepted business language and has an established and balanced legal, regulatory and political system. The UK also benefits from the world's largest tax treaty network and the lowest corporation tax of the G20.

It has the talent pool and infrastructure needed to effectively compete with other jurisdictions, and a current government that appreciates the alternatives industry and is making changes to allow it to develop more freely.

At Alter Domus UK, our team of London-based experts brings a real depth of understanding to the regulatory environment, the professional infrastructure and the economic landscape. We work closely with our clients and their advisors to deliver a high quality and value-adding partnership. Whether clients, their investment targets, or structures are based in the UK, we provide a complete service offering.

This sharp domestic focus is complemented by a truly global perspective. Alter Domus has a presence across five continents allowing us to tap into a network of unrivalled international knowledge and skills.

#### **KEY FIGURES**

120

LOCAL EMPLOYEES

3,600

GLOBAL EMPLOYEES

2011

UK OFFICE ESTABLISHED

\$1.6tn
GLOBAL AUA

36

OFFICES GLOBALLY

#### LOCAL SERVICE OFFERING



Corporate Services



Fund Administration



Accounting & Reporting



Tax & Regulatory Reporting



Capital Administration



Client Portal



Investor



Setup/Divestment Services



Governance & Business Support



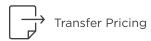
Casn Management



Depositary Services



**DCM Solutions** 





# **Qualifying Asset Holding Company (QAHC) Solutions**

The Qualifying Asset Holding Company regime, or QAHC, is the latest investment structuring product to come into play in the UK. Effective 1 April 2022 as part of the Finance Act 2022, the regime is designed to compete with tax efficient holding vehicles offshore such as in the Channel Islands and within the EU, predominantly Luxembourg.

## Why set up a QAHC?

The QAHC is designed to ring-fence certain investments to benefit from a modified tax regime with the purpose of taxing investors as if the assets were held directly rather than at each level of the structure. Key features include:

- A broad capital gains tax exemption;
- An exemption from the requirement to withhold UK tax from payments of interest;
- The potential to deduct interest on profit related debt instruments; and
- The ability to repatriate funds in the form of capital via a share buy-back.

Further characteristics of the product seek to address the factors which have previously made UK

companies less appealing to structures used by institutional investors and alternative funds both foreign and domestic.

## **Key considerations**

Once the structuring advice tends toward a QAHC, the additional requirements are modest when compared to a standard company. An initial entry notification to HMRC is required, and then an annual information return, along with monitoring that the eligibility requirements continue to be met.

Alter Domus can assist with the provision of information to the appointed tax advisor to support these requirements. All of the other requirements of a QAHC (company secretarial, board support, directorships, accounting and financial reporting) are no different to a standard company, and

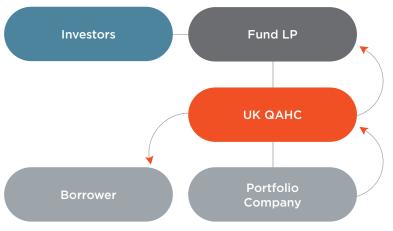
therefore Alter Domus UK is well placed to support them, and clients will benefit from cost effective access to experienced professional services.

#### What can Alter Domus do?

In line with the above, we provide a complete range of QAHC Solutions from incorporation to striking off aside from tax, legal and audit services. Our standard suite of incorporation, directorships, company secretarial, accounting, payments and reporting services are all applicable to clients setting up QAHCs, as are our specialist transfer pricing services.

Our team of 50+ Corporate Services specialists located in London have a wealth of experience supporting transactions and structures across the alternatives industry.

## **EXAMPLE QAHC STRUCTURE**



- No interest withholding tax
- Share buy-backs deemed capital
- · No stamp duty on share buy-back
  - All gains exempt except UK real estate
- Transfer pricing guidance for credit activities
- Overseas property income exempt
- Deductions for profit participating debt

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