

WHY RUN REAL RATHER THAN LETTERBOX SOLUTIONS?

It's tempting to play with diagrams creating structures that appear to be highly tax effective. However, if done without proper consideration of how the structure would work in practice, this can bring many dangers.

For example, your home tax administration may demand to know the location of the effective management and control of an offshore company. An unsatisfactory response could lead them to assume that the entity is managed in your home jurisdiction - with undesirable consequences.

An onshore company or branch operating within the double taxation treaty network may also be confronted with challenges from administrations in the location of the entity's business counter-party. In addition, it may be vulnerable to your home jurisdiction looking to assert home tax on the entity, on the basis of it being a controlled foreign corporation ("CFC").

The answer is clear. Whether offshore or onshore, the entity needs effective day-to-day management that takes place outside your home jurisdiction by someone who understands your business objectives.

This is where Rosetrust can help. We provide the full range of management services for you: not just dealing with statutory requirements, local bookkeeping, tax filings and management, and controlling audits, but also assisting in transaction contracts, negotiations, management, and, where necessary, default follow up. All without taking away your company's involvement in the entity's overall policies and strategies.

Naturally this has a cost. But do remember that much of the work would otherwise be performed by you or your local advisers. Rosetrust is used to integrating with clients' internal accounting and other software. In addition, our hands-on involvement gives you access to the detailed and often invaluable experience we have built up over many years of operating entities within international transactional structures.

Please contact us to discuss your needs.



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