



BOLDER GROUP

(www.boldergroup.com)

Offshore Wealth Virtual Conference
November 2021



Global Reach

British Virgin Islands (BVI)

Cayman Islands

Curacao

Hong Kong

London

Luxembourg

Netherlands

Nevis

Philippines

Singapore

United Kingdom

United States

Zurich



Scope of Operations

Comprehensive Approach

At Bolder Group we specialize in 4 areas of operation:

I) Private

- Company Formation & Management Services
- Estate & Multigenerational Planning
- Family Office Services
- Philanthropic strategies
- Governance Solutions
- Financial Accounting & Reporting

II) Corporate

- Company & SPV Structuring
- Business Support & Market Entry
- Corporate & Secretarial Services
- Financial Accounting & Reporting



Scope of Operations

Comprehensive Approach

At Bolder Group we specialize in 4 areas of operation:

III) Funds

- Hedge Funds
- Private Equity / Venture Capital Funds
- Cryptocurrency Funds
- Real Estate Funds
- Fund of Funds
- Managed Accounts

IV) Governance

- AML: Outsourced KYC Compliance
- AMLCO – MLRO – DMLRO Services
- Automatic Exchange of Information
- Directorship & Office Services
- Regulatory Services

COMMONLY USED STRUCTURES

- BVI Business Company
- Investment Funds
- Trusts



BVI BUSINESS COMPANY

The most common type of company in the BVI is a BVI Business Company and these can be limited by shares or guarantee, or unlimited, and are commonly referred to as BCs.

BVI BC MAIN CHARACTERISTICS

- 1 Director
- 1 Member
- Financial Records
- No Audited Financial Statements

INVESTMENT FUNDS

The following legal structures are available for BVI Investment Funds:

- BVI Business Company
- Segregated Portfolio Company
- Limited Partnership
- Unit Trust

TYPES OF BVI INVESTMENT FUNDS

Incubator Fund

- Maximum 20 investors
- Minimum initial investment \$20,000
- Not exceed \$20 million AUM
- Limited to 2 years with a possible extension of another 12 months. Must then convert or terminate

TYPES OF BVI INVESTMENT FUNDS

Approved Fund

- Maximum 20 investors
- Not exceed \$100 million AUM
- Must appoint an Administrator

TYPES OF BVI INVESTMENT FUNDS

Private Fund

- No minimum initial investment amount
- Limited to 50 investors or must be offered on a private basis
- Classified as a Mutual Fund and benefits from being recognised by the BVI FSC

TYPES OF BVI INVESTMENT FUNDS

Professional Fund

- \$100,000 minimum initial investment
- Aimed at professional investors or investors who are HNWI
- Classified as a Mutual Fund and benefits from being recognised by the BVI FSC

TYPES OF BVI INVESTMENT FUNDS

Public Fund

- No minimum investment requirement
- Aimed at retail investors
- Extensive regulation and oversight by the BVI Financial Services Commission

TRUSTS

Main uses of BVI Trusts

- Will substitute and avoidance of probate
- Ease of administration of family wealth
- Tax planning
- Business and Family succession planning
- Testamentary freedom for those subject to forced heirship principles
- Philanthropy and other non-charitable purposes
- Asset Protection

TRUSTS

VISTA Trust

Allows the shareholder to establish a BVI Trust over the a BVI Company which disengages the Trustee from administrative and managerial responsibility in relation to that BVI Company

TRUSTS

Private Trust Company (“PTC”)

A PTC is a company incorporated with its main function being to act as the Trustee of a specific trust or a number of related trusts.



bolder

Cayman Islands

COMMONLY USED STRUCTURES

- Investment Funds
- Limited Partnership
- Limited Liability Company
- Foundation
- Trusts



Cayman Islands

INVESTMENT FUNDS

Unregulated Fund (Section 4(4))

- Limited to 15 investors which must have the right to elect and/or remove the operator of the Fund
- Must appoint an AMLCO, MLRO and DMLRO



Cayman Islands

INVESTMENT FUNDS

Registered Fund (Section 4(3))

- Minimum investment requirement of \$100,000
- Must appoint an AMLCO, MLRO and DMLRO
- Local audit requirement
- 2 Directors (individuals) registered with CIMA



Nevis

COMMONLY USED STRUCTURES

- Limited Liability Company (LLC)
- Company with limited liability (Ltd., Inc.)
- Trusts
- Captive Insurance



Nevis

TRUSTS

Asset Protection Trusts (“APT”)

To qualify the following criteria must be met:

- Must be at least 1 trustee, which can be a Nevis company, or trust company
- Settlor and beneficiaries must be non-residents of Nevis
- Trust property must not include land in Nevis



Nevis

TRUSTS

Highlights of the APT

- Can't be declared void by reason of any forced heirship rules
- Foreign judgements are not enforceable in Nevis
- Creditor must prove, beyond reasonable doubt, that Trust was established with the intent to defraud him
- Action to set aside the Trust must be done within 2 years of the date the trust was settled
- Creditor must deposit \$25K before bringing action against the trust
- Protector is mandatory



Nevis

CAPTIVE INSURANCE

- No requirement local directors
- No requirement for local board meetings
- No local legal counsel
- No local bank requirement
- No local signatory
- 2 Directors (must be individuals)



Netherlands

COMMONLY USED STRUCTURES

- Company with limited liability (BV)
- Coop
- Fonds voor Gemene Rekening (FGR, mainly used for investment funds)

BV (mainly used as a Holdco)

Main Characteristics

- Practically no minimum capital is required
- Different types of shares allowed. Shares with no rights to profit or liquidation proceeds must always have voting rights
- Shares cannot be listed on a stock exchange
- Annual AGM

Main Reasons to establish a Dutch Holdco

- Participation exemption (no double taxation, as subsidiary has been taxed)
- Absence of capital tax
- Shares cannot be listed on a stock exchange
- Extensive network of some 100 tax treaties and use of EU Parent-Subsidiary Directive
- Low dividend WHT rates on in/out bound dividend payments (EU and/or tax treaty countries)
- Tax treaties with Dutch Antilles



Singapore

COMMONLY USED STRUCTURES

- Singapore Company (limited by shares, by guarantee or unlimited company)
- Limited Liability Partnership
- Singapore Variable Capital Company (S-VACC), relatively new for asset management



Singapore

Singapore Company

Main Characteristics

- May be public or private, with limited or unlimited liability
- One director who must be ordinarily resident in Singapore
- At least one shareholder (individual or corporation). 100% foreign ownership is allowed
- Need to appoint a secretary
- Audited is required (exceptions: turnover less than S\$5 million; less than 20 individual members or has not commenced business)
- AGM must be held



Singapore

Singapore Company

Benefits

- More than 60 double taxation treaties
- No capital gains tax and income is assessed on a territorial and remittance basis
- Foreign source income is not taxed if not remitted to Singapore which allows for low tax jurisdictions to be incorporated into the structure
- Corporation tax is a flat 17% and may be reduced to nearer 10-15% based on trading incentives



Singapore

Singapore LLP

Main Characteristics

- Must have a minimum of two partners and there is no limit on the number of partners that an LLP may have
- Partners can either be individuals or corporations
- Must have registered address in Singapore
- Must have at least one Manager who is a natural person and ordinarily resident in Singapore. The Manager does not need to be a partner of the LLP
- Has separate legal personality
- Must keep accounting records, but not file them