

GIBRALTAR · PORTUGAL
LONDON · HONG KONG

Financial Services

Expert Wealth
Management &
Financial Solutions

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 **ABACUS**
FINANCIAL SERVICES • EST. 1974



Welcome to Abacus!

You are the most important person in our business. We will always put you at the centre of everything we do, whether you are just browsing or about to embark on a relationship with us.

No organisation worth its salt ever rests on its laurels: we are restless in our endeavour to bring about your success and constantly strive to do better by and for you. Our aim is to work hard to achieve your goals and, if you will let us, to invest in and maintain our relationship with you for a generation and more. Whatever you want to engage us to do for you, we will do it well, on time and give you value for money.

This is our promise – we will deliver. My hope is to meet you in person one day and be able to extend a personal welcome to our leading-edge financial services team.

My very best wishes

Chris Pitaluga
CEO – The Abacus Group





We are an independent global financial services provider. Our range of services is primarily aimed at corporate and private clients with cross-border financial requirements. We are proud to offer creative, compliant solutions with a professional efficiency that makes us stand out from the crowd.

Over 40 years in this business has taught us a great deal. We have witnessed an ever-changing international regulatory environment, more integrated taxation regimes, an increasingly complex legal landscape and a world of more competitive international jurisdictions.

We have nonetheless thrived in this context of complex financial change that allows us to share our expertise and provide value for our clients.

This macro environment sets the scene for some of the challenges and pressures our clients face. Whether their needs involve the optimal organisation of family wealth, setting up an investment vehicle, corporate re-structure, or the planning of cross-border financial affairs in a sensible, compliant and tax-efficient manner, we are their quiet, professional partner.

**WE STRIVE TO PROVIDE
INNOVATIVE, EFFECTIVE
AND STRATEGIC SOLUTIONS
ACROSS OUR BROAD
RANGE OF SERVICES.**



Our Services

TRUSTS AND FOUNDATIONS

COMPANY INCORPORATION AND MANAGEMENT

COMPANY SECRETARIAL SERVICES

ACCOUNTING AND PAYROLL

INTERNATIONAL PENSIONS: QROPS & QNUPS

FAMILY OFFICE SERVICES

FUND ADMINISTRATION

WEALTH MANAGEMENT

RESIDENCY SOLUTIONS: GIBRALTAR & PORTUGAL





PEOPLE DO NOT CARE HOW MUCH
YOU KNOW UNTIL THEY KNOW
HOW MUCH YOU CARE

Teddy Roosevelt

Our clients have taught us

Over the decades, we have listened to our clients. Our core values represent what our clients have consistently told us they want from their trusted professional partners. We understand what is important in how we deliver our services, and our business philosophy revolves around these core principles

RESPONSIVENESS:
FAST AND CLEAR COMMUNICATION

ACCESSIBILITY:
CONSISTENT POINT OF CONTACT

PROFESSIONAL KNOW-HOW

FAIR PRICING

INTEGRITY AND
GUARANTEED TRANSPARENCY

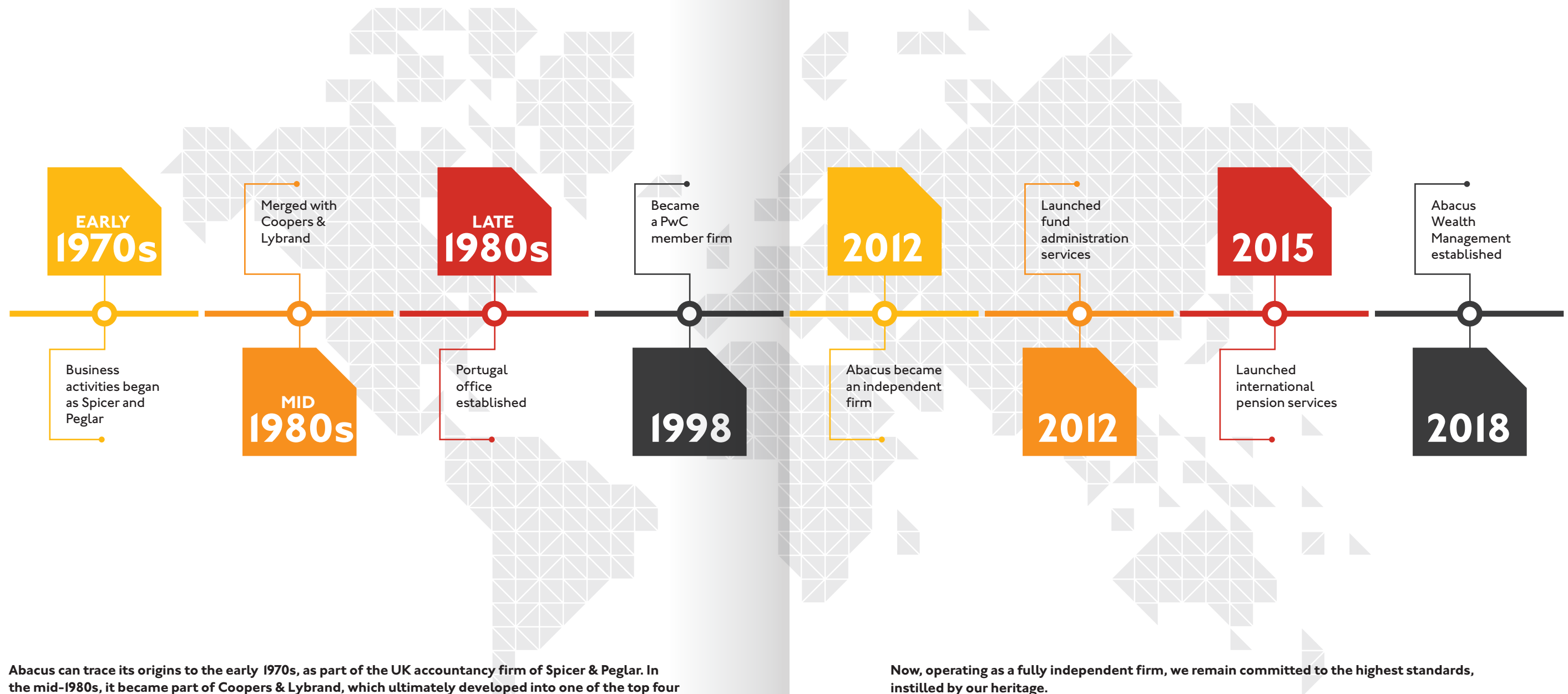
FRIENDLY CLIENT
SERVICES TEAM

LONG TERM RELATIONSHIP
BUILDING

We cannot stress too much how important these are to us in everything we do and every new client relationship we undertake. By integrating these values into our work, we have been rewarded with years of business success and client loyalty, and these are the principles on which we will continue to grow our global business.



A history of inspired success



Abacus can trace its origins to the early 1970s, as part of the UK accountancy firm of Spicer & Peglar. In the mid-1980s, it became part of Coopers & Lybrand, which ultimately developed into one of the top four global financial advisory, consulting and accounting firms, PriceWaterhouseCoopers (PwC). Abacus was a member firm of PwC in its own right.

From the late 1990s onwards, Abacus witnessed unprecedented growth in every sense: its client reach extended well beyond the confines of the Iberian peninsula and the United Kingdom; its business and product offering became increasingly sophisticated as clients demanded more from their fiduciary service provider; and its staff complement multiplied by a factor of five within a decade.

We are proud of our historic association with the PwC network of which Abacus remained a member until July 2012, when Abacus chose to become an independent firm. The partners of both firms in Gibraltar decided then that it would be mutually beneficial to allow Abacus to provide a full range of financial services, as well as its traditional trust and company management service, to all its clients which PwC's auditor independence rules had hitherto constrained.

Now, operating as a fully independent firm, we remain committed to the highest standards, instilled by our heritage.

We are privileged that our clients want to place more of their business with us, as their trusted provider. Our independence has provided the freedom to diversify our business and offer a wider range of services to complement our traditional offering of fiduciary, company administration and accounting services. Our business expanded to offer fund administration, as well as trustee and administration of our own brand of international pensions. We established an independently managed wealth management firm, regulated in Gibraltar, which specialises in the provision of financial advice, and is well versed in cross-border matters.

We turned our attention to furthering our international reach. The nature of our business has meant that we have always enjoyed an extensive global network of clients and professional intermediaries. With long-standing offices in Gibraltar and Portugal, we proceeded to open representative offices in Hong Kong and London.



Trusts

Trusts are an effective estate and succession-planning solution. They allow families to transition their wealth from one generation to the next. Using the services of a corporate trustee will ensure your assets are professionally managed at all times and provides the peace of mind that the structure will work in a way that protects the wealth and interests of your future generations.

We are licensed in Gibraltar to provide a full trustee service and can assist you with setting up your trust and any related entities, whether you are a private individual, a family office or an intermediary.

Our most popular trusts include discretionary trusts, life interest trusts, Asset Protection trusts and purpose trusts. We also administer trusts created by will.

When establishing a trust, we go to great lengths to work with you and a legal adviser to produce a bespoke trust deed that is legally and technically compliant and which takes into account your intentions, vision and specific requirements.

▼ DISCRETIONARY TRUSTS

▼ ASSET PROTECTION TRUSTS

▼ FIXED INTEREST TRUSTS

▼ PURPOSE TRUSTS

Foundations

A foundation is a flexible and increasingly popular alternative to a trust. Whilst not being a hybrid of a trust and a company, it shares many characteristics of both, as it has a separate legal personality. It can, for example, enter into contracts in its own right, as a company does, but may not trade, a characteristic it shares with trusts.

Foundations are often set up by clients from civil law jurisdictions, where the concept of a trust may not be easily recognised. They also appeal to clients who may wish to retain some degree of control over the assets transferred into the structure.

Unlike a company, they can be set up without having a share capital, and unlike a trust, they are registered entities with their own separate identity, whereas a trust only subsists in the person of its trustee. They may be used for a specific purpose, whether charitable or otherwise but are often used in the same way as a trust is to benefit members of a family or a wider class of persons.

We are able to assist with the establishment of Gibraltar foundations, and can also administer foundations in other jurisdictions.

THE BEST WAY TO
FIND OUT IF YOU CAN
TRUST SOMEBODY IS
TO TRUST THEM

Ernest Hemingway



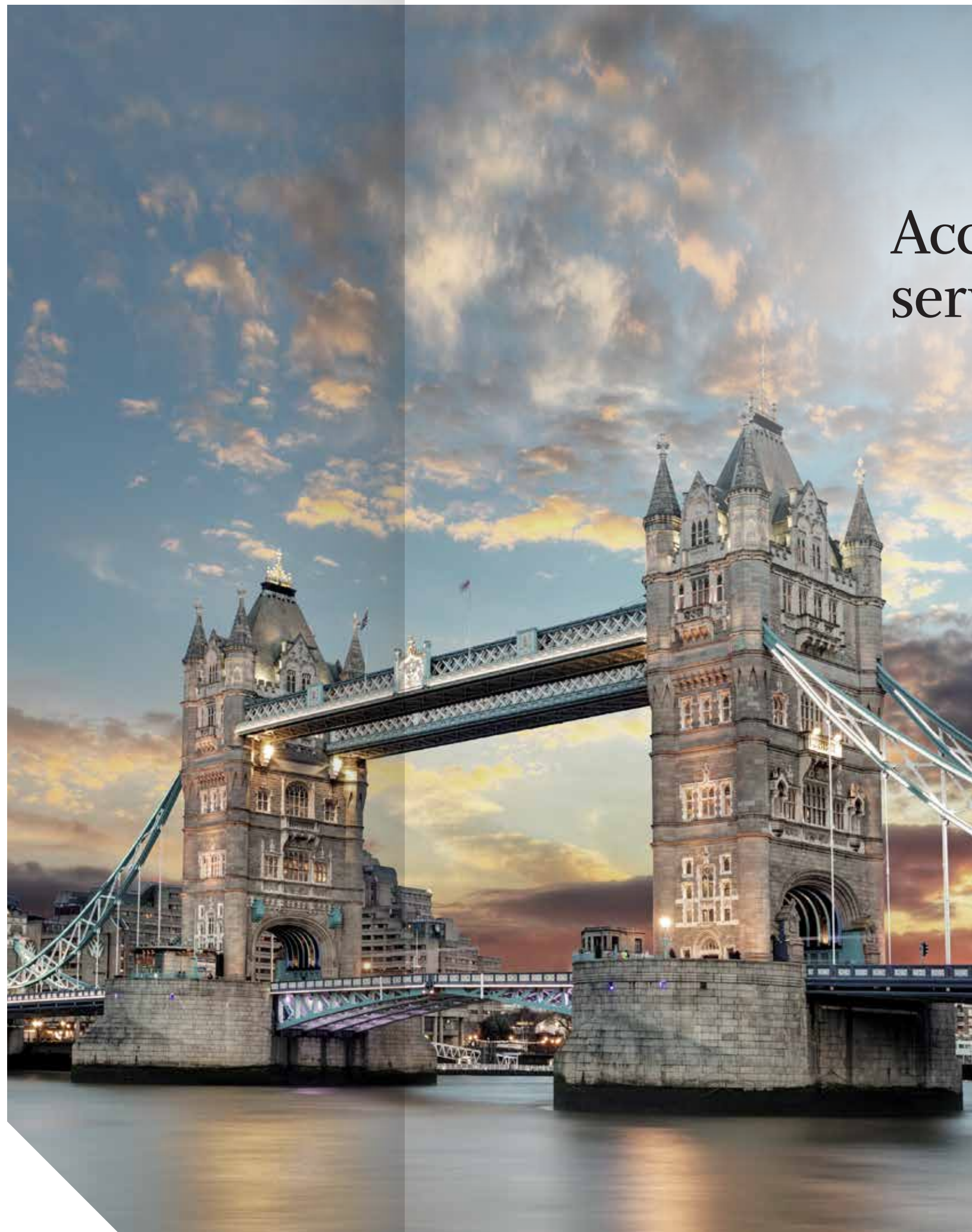
Company administration services

We have been forming and managing companies since we set up our business in 1974. We have a proven track record of expertise in company administration services and can assist you with any requirements you may have.

OUR MAIN SERVICES INCLUDE:

- ▼ COMPANY INCORPORATION
- ▼ ONGOING COMPANY MANAGEMENT
- ▼ REGISTERED OFFICE
- ▼ COMPANY SECRETARIAL
- ▼ BOARD MEETINGS
- ▼ RE-DOMICILIATION SERVICES
- ▼ PROVISION OF DIRECTORS
- ▼ POWERS OF ATTORNEY
- ▼ TRANSFERS OF BENEFICIAL OWNERSHIP

We can assist with the formation of your company, be it in Gibraltar or in a range of other jurisdictions. Although we have an extensive global network and can provide services in many jurisdictions, the most popular include Gibraltar, Malta, Cyprus, Cayman and Delaware.



Accounting services

Our experienced team of accountants supports our clients across a wide range of structures and jurisdictions. The scope of our offering ranges from the timely preparation of year-end financial statements, through tax compliance and reporting, payroll, and liaising with external auditors to sophisticated fund accounting and the calculations of net asset values as required.

Family office services

We deliver a personal service and the management of ultra-high net-worth family wealth by applying our extensive knowledge of international structuring and financial planning to an in-depth understanding of the family's needs and objectives.

We create bespoke structures geared towards management of wealth and delivery of key transactions with the back-up of a strong legal, accounting and compliance team and tax-efficient succession planning so that you may pass on your assets to the next generation as flexibly as you intend, managing out family disputes and administrative complications.

WE CREATE BESPOKE STRUCTURES GEARED TOWARDS MANAGEMENT OF WEALTH, DELIVERY OF KEY TRANSACTIONS, THE BACK-UP OF A STRONG LEGAL, ACCOUNTING AND COMPLIANCE TEAM



Fund services

Gibraltar is an excellent location for the establishment of funds. An extensive professional infrastructure, robust regulatory regime and favourable tax system has allowed the territory to position itself uniquely as a high quality, low-cost centre for fund administration. We also administer funds incorporated in other jurisdictions.

By virtue of its constitutional and economic relationship with the United Kingdom, Gibraltar sets and complies with the highest standards of regulation against a well-established legal backdrop. It has enjoyed political and economic stability for many decades and, as a result of its compliance with all the UK's, and, historically, the EU's financial services regulations, Gibraltar has achieved OECD White List status and remains committed to complying with those standards.



TYPES OF FUNDS

The two main types of fund that may be established in Gibraltar are Private Funds and Experienced Investor Funds (EIF), although UCITS may also be established. In addition, distributed ledger technology (DLT) legislation, which Gibraltar pioneered, has led to the establishment of "crypto funds", which can be structured either as Private Funds or EIFs, although the EIF vehicle is strongly recommended for this purpose owing to the high-risk nature of managing crypto assets.



“GIBRALTAR OFFERS ROBUST LEGISLATION AND TAX ADVANTAGES WITHIN A HARMONISED EU FRAMEWORK. IT IS FLEXIBLE AS A SMALL JURISDICTION WITH FIRST-CLASS INFRASTRUCTURE AND EUROPEAN “PASSPORTING RIGHTS” FOR INVESTMENT FIRMS



Private Funds

As a collective investment scheme, the Private Fund may be made available without public disclosure or notification to an identifiable group of up to 50 participants. The main advantages of a Private Fund in Gibraltar are its speed to market, lower cost, and the simplicity of registration with the Gibraltar regulator.

It is essential, however, for an Offer Document (also sometimes referred to as a Private Placement Memorandum or PPM) to be drafted by a legal adviser and the criteria that enables investors to qualify as “private” need to be defined. Unlike an EIF, there is no requirement for Private Funds either to appoint any locally authorised directors or to be audited. A fund may start life as a Private Fund in order to keep initial costs low and then after a 12 month period or later, opt to convert to an EIF.

In relation to crypto funds, a Private Fund is generally set up for the purpose of one investor, normally where the fund promoter wishes to trade its own digital assets within a formal fund structure.

**GIBRALTAR IS A
ROCK SOLID
JURISDICTION TO
SET UP A FUND.**

Experienced Investor Funds (EIFs)

EIFs are authorised and regulated by the Gibraltar Financial Services Commission (GFSC) and are collective investment schemes solely for so-called “experienced” investors. They allow for a wider range of investments than Private Funds do, from traditional asset classes to alternatives, and there are no diversification requirements. In addition to this, an EIF

may be marketed to an unlimited number of investors as long as they meet the definition of “experienced”.

Owing to these characteristics, the EIF is the main type of fund used to support investments in crypto-currencies, tokenised securities and other digital assets.

THE MAIN FEATURES OF AN EIF ARE:

They are regulated investment schemes

There is no limit on the number of investors

The Board of Directors must include two EIF Directors who are Gibraltar resident, although it is possible to apply to the regulator for this to be reduced to one EIF-authorised director. Other directors may be resident elsewhere

They may be self-managed

A regulated fund administrator is required

They must draw up a Private Placement Memorandum (PPM), offer document or prospectus

They benefit from a pre-launch approval mechanism, which means that no regulatory approval is required before the fund can start to raise capital, allowing for speed to market

They must have policies on how to deal with the custody of crypto-assets, anti-money laundering and security risks

A company manager and secretary is required

There are no investment or borrowing restrictions

They may be incorporated under a variety of structures, such as an ordinary limited company or a Protected Cell Company

A legal opinion from a Gibraltar lawyer is required to confirm compliance with EIF Regulations

They must be audited annually by an approved auditor



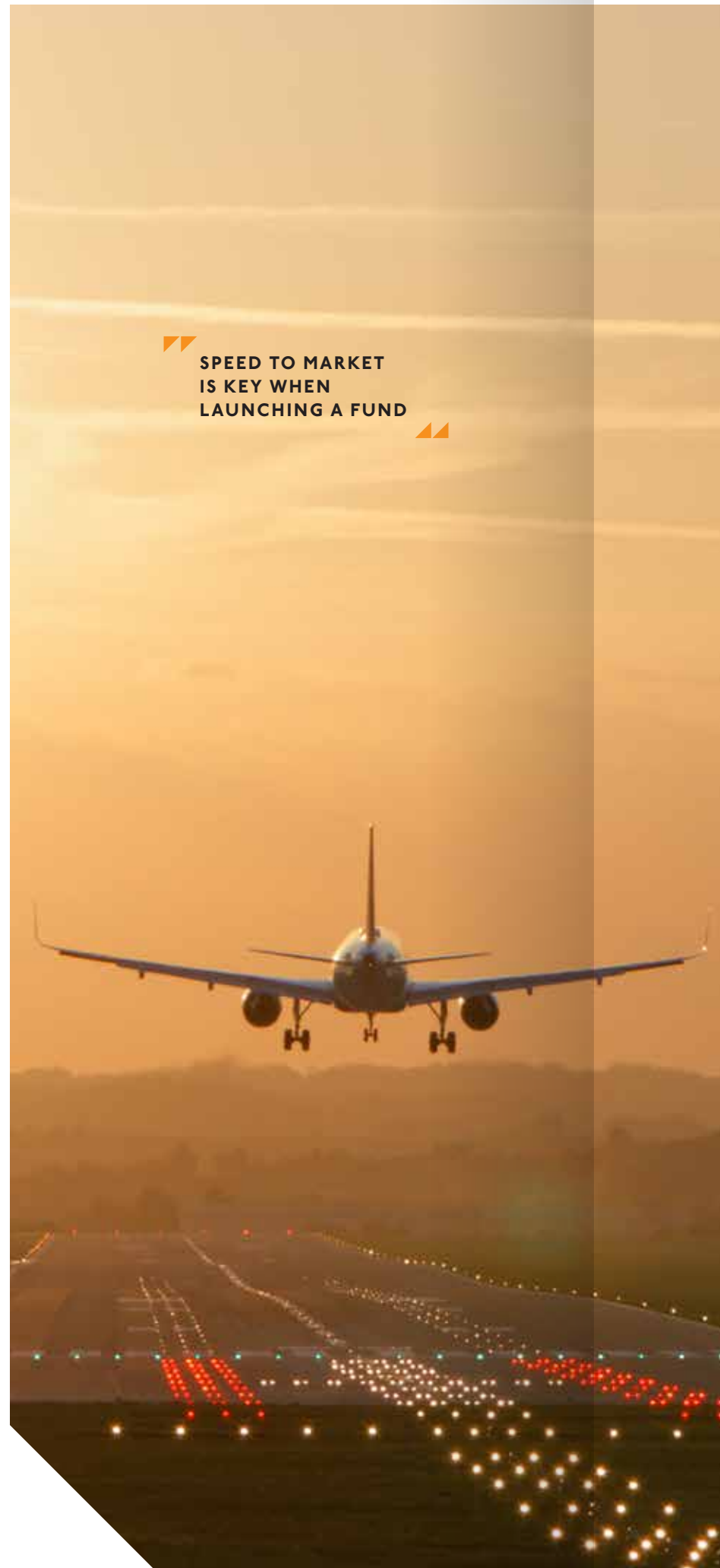
Taxation of a fund in Gibraltar

Gibraltar's corporation tax rate is 12.5%. However, all income received by a Gibraltar fund which accrues and is derived from outside of Gibraltar is not liable to taxation. In addition, there is no VAT or capital gains tax and no dividend or withholding tax for non-Gibraltar residents.

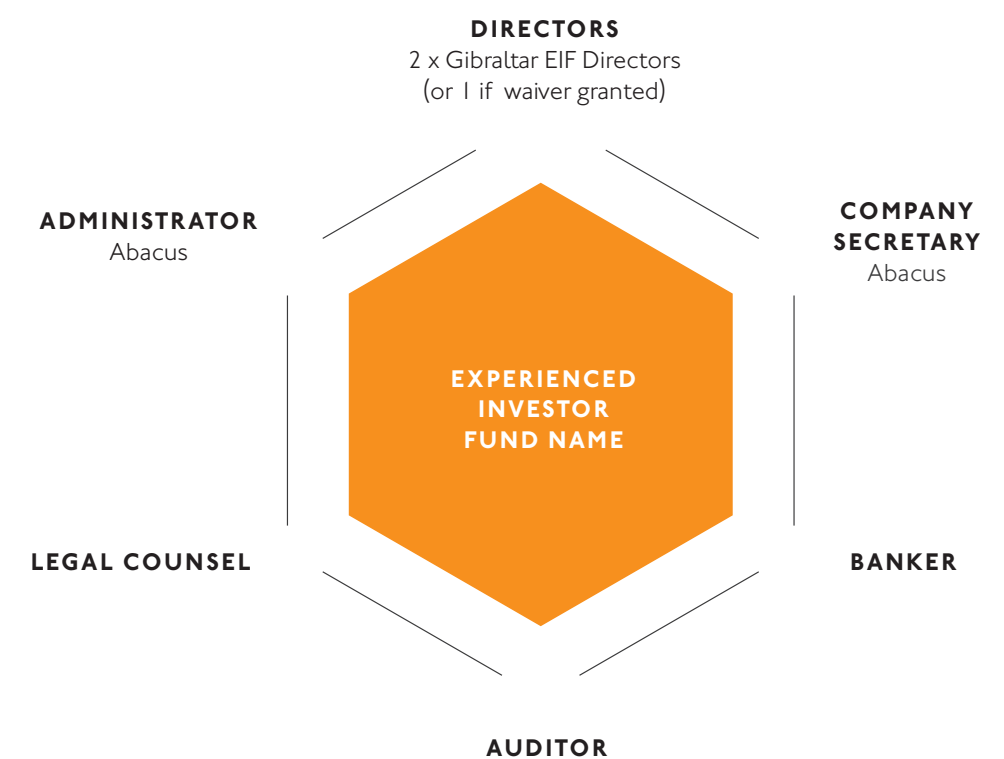
Our Fund Administration Services

We provide a full range of fund administration and fund accounting services. We can also assist with the establishment of the fund's legal entity and provide ongoing registered office and company secretarial services. We have excellent relationships with relevant professional partners, such as lawyers, banks, and auditors, and we arrange all initial meetings as required to ensure the successful establishment of your Gibraltar fund. Our team of fund experts will be delighted to assist you with your new fund and guide you through the entire process. If you prefer your fund domicile to be outside Gibraltar, we can still work with you and provide our fund administration service.

**SPEED TO MARKET
IS KEY WHEN
LAUNCHING A FUND**



Stakeholders in an Experienced Investor Fund





International pensions: QROPS & QNUPS

QROPS

A QROPS is an overseas pension scheme which may enable you to draw your pension in a tax-beneficial way, providing certain conditions are met. It stands for Qualifying Recognised Overseas Pension Scheme.

It is a HMRC-recognised pension scheme based in another country or jurisdiction which will accept the transfer value from your UK-registered pension scheme, be it an occupational or a personal pension scheme. This makes it possible to transfer your UK pension to a jurisdiction that may be more suitable for your personal and financial circumstances, than if you left it in the UK. We offer Gibraltar and Malta QROPS.

WHO IS ELIGIBLE?

Any national who has built up a UK-registered occupational or personal pension and has now become a UK non-resident, or is thinking of becoming so in the near future. It might be suitable for any individual who is considering retiring abroad, although for the full tax benefits to apply, you must have been a non-UK resident for 10 complete tax years when you commence taking benefits from your pension plan. A QROPS may also be appropriate for a UK resident with pension funds approaching the UK Lifetime Allowance limit who has not applied for transitional protection. There is no requirement for you to be resident in the jurisdiction chosen for your QROPS. Gibraltar offers a low, flat rate of tax of 2.5% on QROPS pension income, both for residents and non-residents and there is no inheritance tax.

QROPS - BENEFITS

- ▶ You can access wider investment options.
- ▶ You remove your pension from the UK tax system, thereby only paying tax on your pension in your jurisdiction of tax residence where tax rates may be lower than in the UK.
- ▶ You can reduce your currency risk as your QROPS can be denominated in euros.
- ▶ The value of your QROPS will not be subject to a test after the transfer has been effected, and therefore you may save a possible future tax charge had it been left in the UK.
- ▶ You may be eligible to take a tax-free lump sum of up to 30% of the pension value.
- ▶ You can plan the succession of the assets by nominating a beneficiary who will receive the value of your QROPS after your death.
- ▶ You can consolidate all your existing pension plans into one scheme, administered by one provider.





QNUPS

A QNUPS is an overseas pension scheme which may enable you to benefit in a tax-efficient manner from assets that might not otherwise be included in your pension provision. It stands for Qualifying Non-UK Pension Scheme.

It is an overseas pension plan that meets the definition of the QNUPS regulations as set out in the Inheritance Tax Statutory Instrument (SI) 2010/051. QNUPS must meet certain strict requirements and incorporate specific criteria in their scheme rules, in a similar way to QROPS, but with additional flexibility, so that they may be considered as an acceptable overseas pension scheme by HMRC.

A QNUPS can be a highly attractive supplementary pension vehicle when used as part of a wider retirement planning strategy. It can be used to meet a funding shortfall in your retirement and help you achieve the level of pension income you require, in a flexible investment environment and with substantial tax advantages. As a non-UK pension scheme, there are no limits on the amount of contributions you can make into a QNUPS, and the annual allowance and lifetime allowance limits do not apply, even for UK residents.

Whilst there is no UK tax relief available on such contributions, QNUPS allow a wider range of investment options than their UK counterparts including cash, equities, private equity, bonds, commercial property, and even, and especially, residential buy-to-lets.

**WHEN YOU STOP LIVING AT
WORK AND START WORKING
AT LIVING – RETIREMENT**



QNUPS - WHO MAY BENEFIT?

- ▶ UK domiciled, but non-UK resident individuals who wish to make retirement provision and are not eligible to pay into a UK-registered pension scheme.
- ▶ UK expatriates who may eventually return to the UK.
- ▶ UK residents who wish to contribute more than the permitted annual allowance of £40,000 into their pension schemes may opt to use a QNUPS, in addition to their UK pensions, to house such additional contributions.
- ▶ High net-worth UK residents who find that their UK pensions are approaching the UK Lifetime Allowance Limit, and feel that this restricted pension value will not generate sufficient pension income in retirement to maintain their current lifestyle. A QNUPS may be used to complement their UK pensions and boost their overall retirement income.
- ▶ UK resident and UK domiciled but non-resident individuals who wish to hold (or currently hold) residential property, such as holiday homes or buy-to-lets (not their main residence) that they regard as a future income stream in retirement. These arrangements can be formalised by transferring the property into a QNUPS and benefiting from the tax advantages associated with recognised pension structures.



Residence solutions: Gibraltar

1 Gibraltar category 2 status

Gibraltar is a sought after jurisdiction for individuals with substantial worldwide assets and income, offering the financial benefits of compliant tax planning in a unique Mediterranean environment.

Individuals can establish residence in Gibraltar and benefit from a favourable low-income tax treatment known as a Category 2 status ("CAT2 status"). Status is subject to an application granted at the discretion of the Gibraltar Finance Centre Director once certain criteria has been met. Residence can then be easily obtained once the CAT2 status has been granted.

KEY FEATURES AND BENEFITS

CAT2 individuals are taxed under the Allowance Based System ("ABS") on the first £118,000 of assessable income, per year of assessment. This amounts to a maximum tax payable of £44,470 per year of assessment under the ABS. The minimum tax payable income from a CAT2 individual is £37,000. Tax is only paid on income remitted (i.e., physically transferred) to Gibraltar.

Gibraltar property rental income falls outside from the maximum capped accessible income.

Existing CAT2 individuals are required to make a one-off payment in advance of £44,470 by 30 November 2022 and new CAT2 individuals are required to make this payment on confirmation of their status.

If individuals leave Gibraltar and their CAT2 certificate is surrendered, this sum is fully refunded.

Individuals can benefit from Gibraltar as an efficient financial services centre, with no inheritance tax, gift or wealth tax or capital gains tax.

Children of individuals with a CAT2 status are also eligible to attend state schools in Gibraltar which follow the UK national curriculum.

Notably, there is no minimum number of days that must be spent in Gibraltar in any year of assessment to enjoy a CAT2 status, however individuals should not engage in any trade, business or employment in Gibraltar, unless agreed in advance with the Gibraltar Finance Centre Director.

WHAT ARE THE REQUIREMENTS?

- ▶ The purchase or rental of approved and suitable residential accommodation in Gibraltar, available to the individual and if applicable, their family. Accommodation must be available for exclusive use to the individual and if applicable, their family, for the whole of the year assessment.
- ▶ A minimum of £2 million net assets. The Government of Gibraltar will wish to ensure that the applicant has the means to be financially self-sufficient.
- ▶ Individuals must have been a non-Gibraltar tax resident for the five continuous years preceding the application.
- ▶ Individuals are required to provide a CV listing their qualifications and work experience, and two references for the purpose of confirming their good financial standing. One must be from a recognised banking institution
- ▶ Individuals must have or take out private medical insurance.

INDIVIDUALS CAN ESTABLISH
RESIDENCE IN GIBRALTAR AND
BENEFIT FROM A FAVOURABLE
LOW-INCOME TAX TREATMENT
KNOWN AS A CATEGORY 2 STATUS

2 High Executive Possessing Specialist Skills (HEPSS)

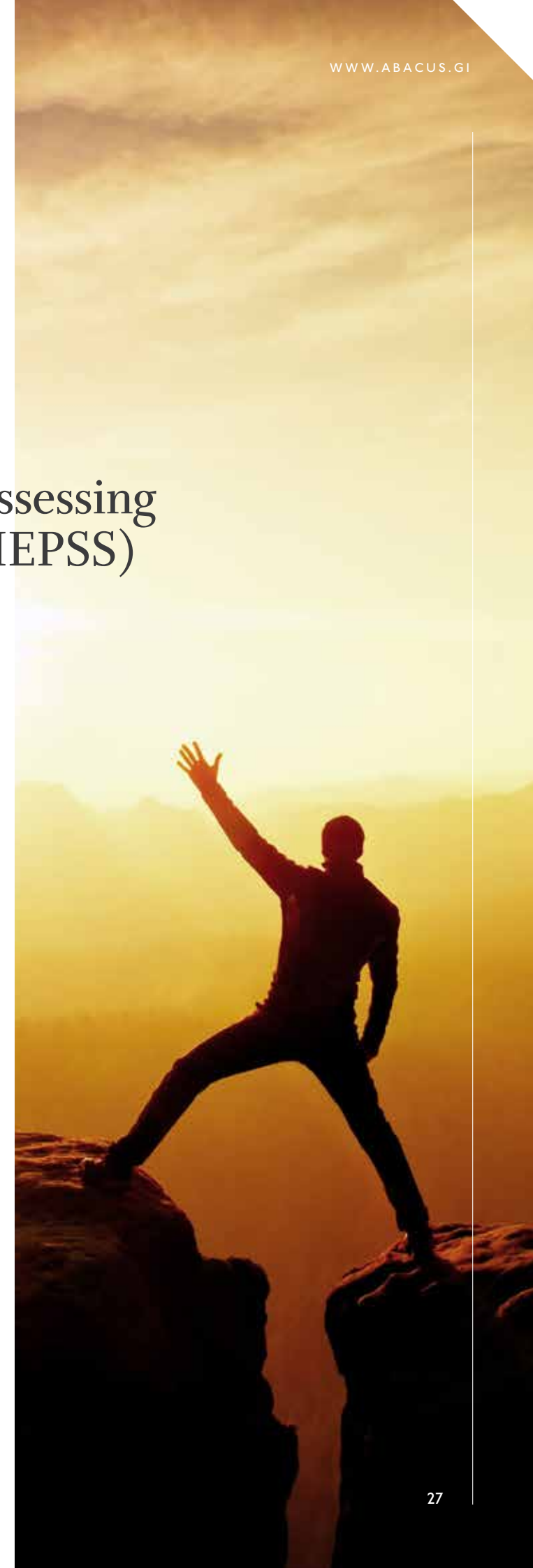
The Higher Executive Possessing Specialist Skills ("HEPSS") status is a unique employment tax status for senior executives who wish to relocate to Gibraltar and participate in business activities.

Individuals with this status benefit from only paying tax on the first £160,000 of assessable income per annum under the Gross Income Based (GIBS) tax system. This results in an annual tax payable of £43,140.

This cap only applies to income received from employment under which a HEPSS certificate has been granted. Other instances would be taxed under normal Gibraltar income tax rules.

WHAT ARE THE REQUIREMENTS?

- ▶ HEPSS status will only be granted to individuals the Gibraltar Government believe possess specialist skills that are not readily available in Gibraltar.
- ▶ Individuals must be able to offer skills which help sustain economic activity of particular value to Gibraltar.
- ▶ Individuals must own or rent accommodation in Gibraltar which meet a certain standard to obtain HEPSS status.
- ▶ The individual must not have been gainfully occupied or resident in Gibraltar for three years preceding the year of application.
- ▶ The individual must have a valid passport and provide a CV and two independent references from recognised institutions or professionals, one of which must be a bank.





Residence solutions: Portugal

Non-Habitual Residency

Portugal offers competitive tax and investment opportunities for individuals who seek to enhance their tax efficiency via the Non-Habitual Resident regime. This is a competitive and favourable tax regime that is available to non-resident individuals who have not lived in Portugal for the previous five years and who intend to establish themselves in Portugal.

Valid for a ten year period, NHR aims to attract highly skilled professionals, high net-worth individuals and investors or retirees of any nationality. Benefits include favourable taxation of foreign income, certain tax exemptions in Portugal and a possible double exemption from tax both in Portugal and the country in which the income is obtained if a Double Taxation Agreement is in place.

IN ORDER TO QUALIFY FOR NHR THE APPLICANT MUST

- ▶ Not have been taxed as a Portuguese tax resident in the five years prior to taking up residence in Portugal
- ▶ Then become a tax resident under Portuguese law
- ▶ Register as a Non-Habitual Resident in Portugal
- ▶ Rent or acquire real estate in Portugal



Wealth management



Abacus Wealth Management Limited serves the investment planning and wealth management needs of clients across Europe, including (but not limited to) Gibraltar, UK, Ireland, Spain and Portugal. We aim to provide the best advice in all cases to ensure that the highest standards of probity and professional investment decision-making are maintained.

Core areas of financial advice offered include portfolio investments, mutual funds, life assurance and retirement planning, for both private individuals and corporate clients. Abacus Wealth Management prides itself on its duty of care to clients. We are strong advocates of the modernisation of

financial and investment services in line with current technological developments, fees transparency and the cost savings that these provide to clients. Our independence ensures a full focus on client needs, acting only in their best interests by providing unbiased, transparent and independent advice.

- ▶ Investment advice
- ▶ Retirement planning and pension transfer advice
- ▶ Life insurance, critical illness and income protection advice

TRUSTED TO DELIVER VALUE

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