

FUND AND ALTERNATIVE ASSET MANAGERS

With the ever increasing scrutiny of the fund and alternative asset management industry, managers are faced with a constantly changing landscape of tax and regulatory regimes. In recent years, the UK has challenged current legal and structural arrangements by changing its taxation of management fees and carried interest returns, whilst the US has seen similar changes under the US Tax Cuts and Jobs Act.

The organisational structure of an investment managers business remains important with regard to protecting the taxation treatment of non-domiciled UK residents. However, when the business, its owners and/or its employees are subject to both the US and UK tax systems it is often less about complex tax structuring and more about ensuring the tax treatment across both jurisdictions is aligned and optimised. Avoiding double taxation and minimising negative cash flow is a priority. Frank Hirth's dual qualified team members ensure this simultaneous analysis is standard practice.

There are other developments, including the implementation of the Foreign Account and Tax Compliance Act (FATCA) and the Common Reporting Standards (CRS), that directly affect the asset management industry.

HOW WE CAN HELP

At Frank Hirth, we have a team of highly experienced dual US and UK handlers and US and UK specialist teams who work with those in the fund and alternative investment space. Our senior leadership team each have over 15 years' experience of assisting individuals and businesses in the Fund Manager space.

We can bring the 'best of Frank Hirth' to any engagement and assist with areas such as:

- Actively team with your Legal and Regulatory advisors to establish the business structure (see Investment Funds flyer);
- Advising on UK disguised investment management fees ("DIMF") and co-investment returns;
- Advising on the US Federal and State taxation treatment of income and carried interest returns;
- US and UK partnership, corporation tax and informational return preparation;
- US and UK personal tax and informational return preparation for owners and employees;
- Full accounting and audit services, including financial statements preparation, audit, VAT, payroll etc.;
- FATCA and CRS analysis, including entity classification and annual reporting of account holders;
- Year-end planning, including mitigation of both double taxation and negative impacts on cash flow;
- Optimising the method and timing of profit extraction from the business.

HIGHLY EXPERIENCED DUAL US/UK HANDLERS AS WELL AS SPECIALIST TEAMS.

For more information about any of these services, please contact Directors:



James Murray
James.Murray@frankhirth.com



Steve Butler
Steve.Butler@frankhirth.com



Eric Collins
Eric.Collins@frankhirth.com