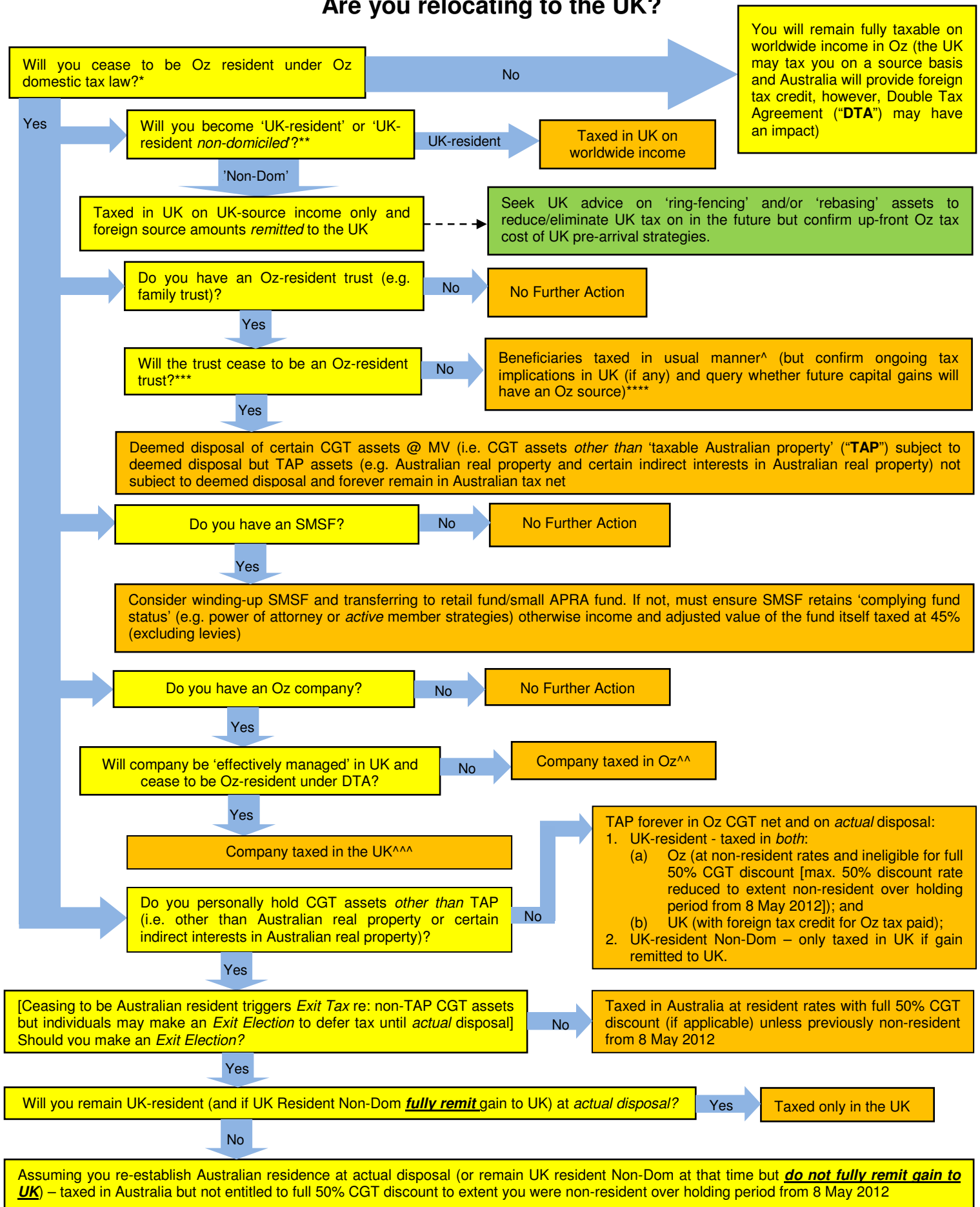


# Are you relocating to the UK?



\* Tax residency requires careful analysis of the facts in light of domestic Oz tax law;  
 \*\* Specific UK advice required;  
 \*\*\* Trust residency (except unit trusts) depends on residency of trustee or exercise of central management and control in Oz at any time in income year;  
 \*\*\*\* Foreign source capital gains flowing through an Oz trust to a non-resident beneficiary not taxed at all in Oz, however, the source of a capital gain is a vexed question based on all the relevant facts and circumstances;  
 ^ Beneficiaries generally taxed on income to which presently/specifically entitled (trustee has primary liability for non-resident beneficiary);  
 ^^ If not taxed as UK resident company under DTA, must confirm operation of UK CFC rules;  
 ^^ Confirm whether company has 'permanent establishment' (and therefore taxed on business profits in Oz)

**Disclaimer – This is general information only. Specific tax outcomes may only be determined based on the particular circumstances of each case**