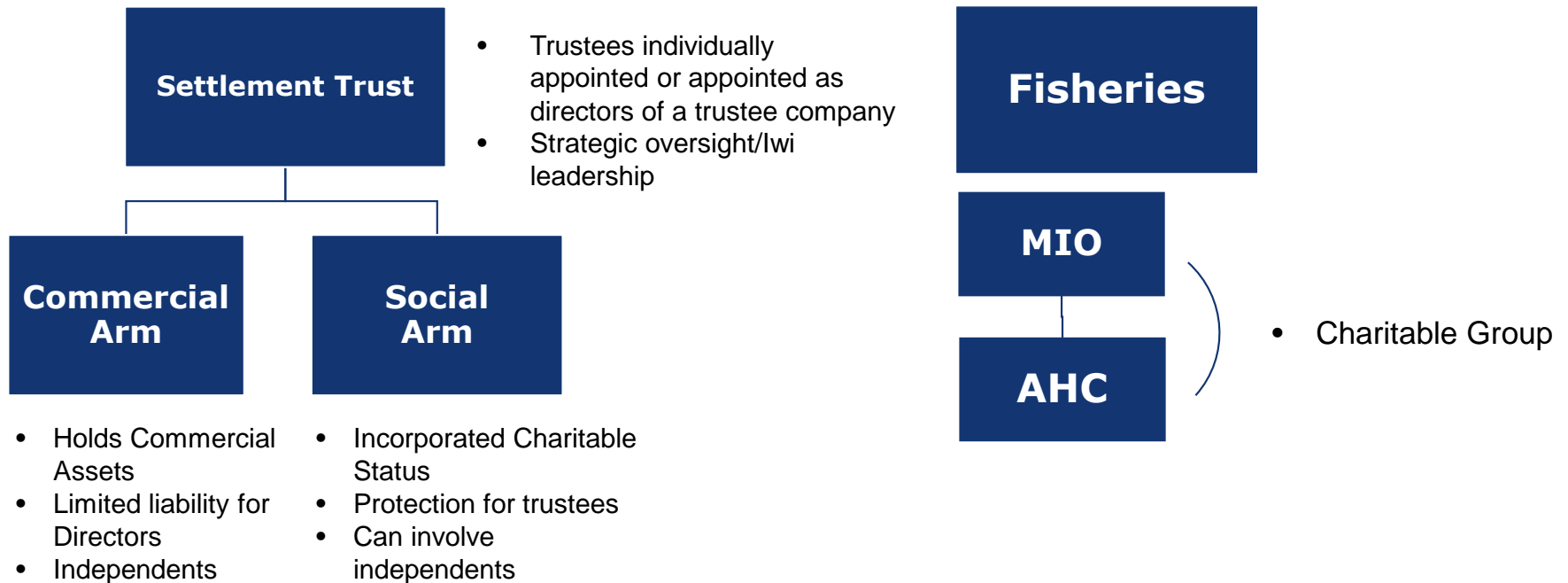


Settlement Trusts

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Most common structures

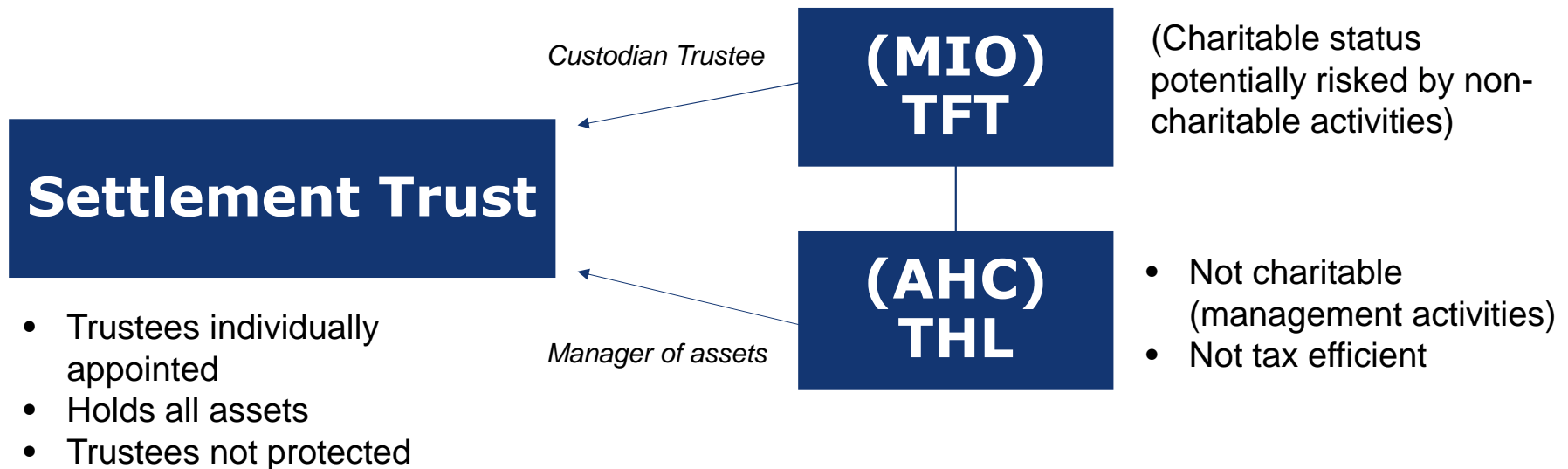


Common three tier structure






Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA
Commercial arm	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA
Charitable arm	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

In all three arms Trustees / governors are protected from personal liability for commercial activities and Tax is minimised as appropriate.

Tapuika Structure

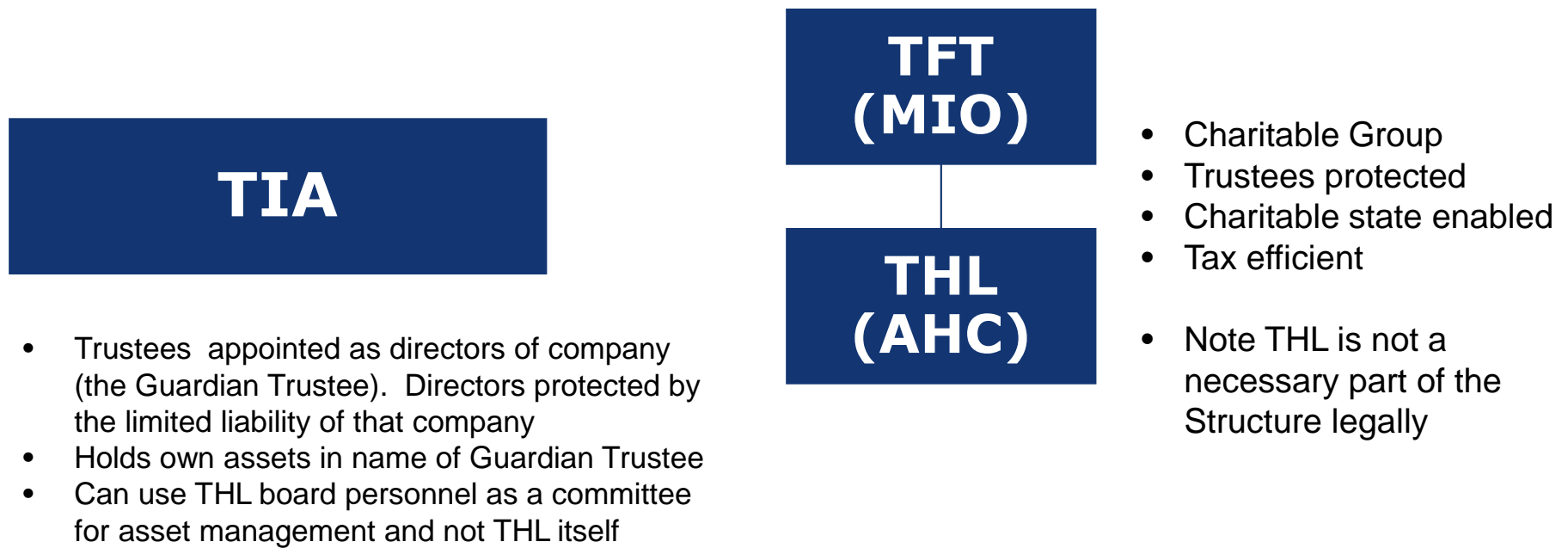


Tapuika Structure

Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust			NA
Commercial arm			
Charitable arm			

Governors are not all being provided with protection from personal liability and taxation of charitable assets has been compromised.

Proposed Structure change for TIA



Outcome

Entity	Governors protected from commercial risk	Tax efficient.	Charitable status safe.
Parent trust	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NA
Commercial arm			
Charitable arm	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Helen Nathan

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