



# Clients of Chinese origin

## THE UK

### Asia Advisory Group

The BDO Asia Advisory Group is comprised of highly experienced tax teams based across the globe including in Canada, China, Hong Kong, Singapore, the UK and the US. Our approach is to bring advice to life; advising clients what to do, not 'what we know'.

We work with wealthy individuals and families, business owners and family offices who are seeking an adviser to help them structure their UK and international affairs in an efficient and compliant manner. Our tax teams have a deep understanding of their local tax system, and its interaction with other jurisdictions. We can work with you in collaboration with your other professional advisers and family office to deliver solutions that are right for your circumstances.

### Why the UK?

From 6 April 2025, the 'non-UK domicile' regime has been replaced by a new 'UK Resident' regime, that provides 100% tax relief on foreign income and gains realised in the first four UK tax years. Individuals moving to the UK can therefore plan how to manage their wealth tax-efficiently while in the UK. Under these new tax rules, relief is available so there is no Inheritance tax on non-UK assets in the first 10 years of UK tax residency, except in certain cases, where the asset derives its value from UK residential properties..



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### The UK Team

Our private client specialists provide a holistic approach. Our services include the following:

- ▶ **Wealth and asset protection** - Inheritance tax and succession planning including advice on the use of trusts and other entities in structuring and preserving global wealth
- ▶ **Businesses** — Capital gains planning, optimising tax rates and reliefs
- ▶ **International tax** — Co-ordinating and advising on the different tax regimes between countries
- ▶ **Tax residence** — Advice and practical guidance on moving to the UK and other countries
- ▶ **New UK Resident regime** — Navigating these complex rules to ensure UK tax is not triggered unnecessarily
- ▶ **UK tax compliance** — Assisting with filings with the UK tax authorities

## Example case study

### Income tax (IT)

Tax on income e.g. salary, dividends and rental profits (up to 45% currently, and up to 47% from 6 April 2027).

### Capital gains tax (CGT)

Tax on profit realised on the disposal of an asset (up to 24% unless it relates to carried interest).

### Inheritance tax (IHT)

Tax on death (40%) and in certain situations, where gifts are made during lifetime (20%).

### Non-UK assets

Under the new UK Resident regime, relief is available so there is no IHT on non-UK assets in the initial years of UK tax residency. There are exceptions where UK residential properties are involved, and where such assets are held in an offshore structure, such as a trust or a company.

### The new 'UK Resident' regime

The new 'UK Resident' regime provides 100% tax relief on foreign income and gains (FIG) even if brought to the UK, in the first four UK tax years of UK tax residency. A claim needs to be made by 31 January of the second tax year following the relevant tax year and it is necessary to nominate all sources of FIG to which you wish the rules to apply.

### Annual tax on enveloped dwellings (ATED)

Residential properties valued at more than £500,000, owned by 'non-natural persons' (e.g. a company), are subject to a tiered ATED charge at up to £292,350 per annum (£303,450 from 1 April 2026) where the property is valued at more than £20m) unless a relief is available.

### Stamp Duty Land Tax (SDLT)

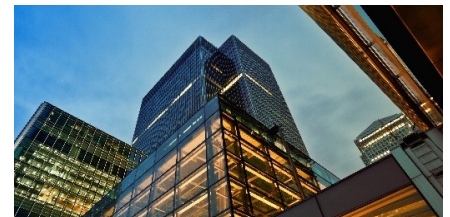
In England and Northern Ireland, SDLT on the consideration for the purchase of a property is payable by the purchaser at up to 19%. Different regimes and rates apply in Wales and Scotland.

### Stamp duty (SD)

Stamp duty is due at the rate of 0.5% on the purchase of shares in a UK company, or the purchase in the UK of shares in a foreign company (where contracts are executed in the UK).

### Corporation tax (CT)

UK resident companies and non-UK resident companies are subject to CT at 25% on income and gains (where profits exceed £250,000).



## BDO International

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MEMBER FIRMS ONLY  
2024/2025  
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COUNTRIES &  
TERRITORIES

**870 OFFICES**  
**94,900 STAFF**



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