Property Unit Trusts - A Comparative Guide.

CAINS

The table below sets out some, but by no means all, of the key differences between an IPUT and a JPUT:

Key differences

	IPUT	JPUT
Types of private arrangements	Exempt Scheme: • less than 50 investors • single or multiple asset • no invitation to the public • no minimum investment level	Non-Fund JPUT: • usually one or two investors • single asset (no risk spreading) • no invitation to the public • no minimum investment level Jersey Private Fund ("JPF"):: • less tha 50 'professional' and/or 'eligible' investors only • multiple assets • minimum initial investment of not less than £250,000 (or currency equivalent, unless a 'professional investor')
Regulatory consent to set up	No – No notification requirements or other delays in setting up an Exempt Scheme IPUT (regarded as a private arrangement)	Yes – For a JPF
Regulatory consent to issue units	No	Yes
Ongoing regulatory notifications	No	Yes – For a JPF (material changes only and dependent on EU marketing
Public disclosure requirements	No	No
Borrowing, security and guarantees	Yes – Additionally the principles of taking and enforcing security and the granting of guarantees under Isle of Man law largely mirror that under English law, so such concepts will be familiar to most UK financial institutions	Yes
Tax Efficiency	• No income tax, capital tax or stamp duty payable in the Isle of Man • Can be structured as transparent for UK income tax purposes • May elect to be treated as exempt or transparent for UK capital gains tax purposes	• No income tax, capital tax or stamp duty payable in Jersey • Can be structured as transparent for UK income tax purposes • May elect to be treated as exempt or transparent for UK capital gains tax purposes
Auditing requirements?	No	No