

Offshore Bond Guide

For the Tax Year 2025/26

An Offshore Bond provides a sophisticated and tax-efficient investment wrapper particularly valuable for high-net-worth individuals, trustee investors, and those seeking international investment flexibility within a simplified tax structure, making it a powerful component in comprehensive wealth management strategies.

What is an Offshore Bond?

An Offshore Bond is a life insurance-based investment product issued by a non-UK (offshore) insurance company, typically based in jurisdictions such as the Isle of Man, Dublin, or Luxembourg.

Unlike traditional insurance policies, these bonds are primarily investment vehicles that offer a tax-efficient structure for medium to long-term wealth growth.

These bonds provide access to a diverse range of investment options within a single tax wrapper, allowing investors to build portfolios aligned with their specific financial objectives while benefiting from the tax advantages of gross roll-up.

Unlike ISAs or pensions with annual contribution limits, offshore bonds offer unlimited investment potential and exceptional withdrawal flexibility, making them particularly valuable for investors with substantial investable assets or complex financial needs.

What types of Offshore Bonds are available?

- **Single or Multiple Policies** – Offshore bonds are typically structured as a series of identical policies (segments), providing enhanced flexibility for tax planning, withdrawals, and assignments. This segmentation allows for more precise tax management when accessing your investment.
- **Open Architecture Platforms** – Many offshore bonds offer access to a comprehensive range of investment options, including:
 - Collective investment funds
 - Discretionary managed portfolios
 - Direct equity holdings
 - Structured products
 - Alternative investments

- **Life Assurance or Capital Redemption** – Offshore bonds are generally available in two structures:
 - Life assurance contracts (linked to lives assured and ending on death)
 - Capital redemption contracts (fixed term, typically 99 years, with no lives assured)
- **Multiple Currency Options** – Bonds can be denominated in various currencies to align with your investment preferences or future spending needs.

Who is eligible?

Offshore bonds are accessible to a wide range of investors:

- UK residents (subject to local tax rules)
- Non-UK residents (depending on jurisdiction and provider)
- Individuals aged 18 or over
- Trustees acting for various trust structures
- Corporate entities and charities
- Joint applicants (typically up to 6 individuals)

If you lack capacity, an attorney or deputy can manage the bond on your behalf with appropriate documentation and permissions.

Most providers impose minimum investment thresholds rather than age limitations, with typical minimum investments ranging from £20,000 to £100,000 depending on the provider and product features.

Who can open and manage an Offshore Bond?

Several parties may be involved in the establishment and management of an offshore bond:

- **Policyholder** – The individual or entity who legally owns the bond, makes investment decisions, and has withdrawal rights.

- **Lives Assured** – For life assurance bonds, these are the individuals whose lives determine when the bond ends. Often the policyholder is a life assured, but this is not mandatory. A bond can continue until the death of the last life assured.
- **Trustees** – For bonds held in trust, the trustees make investment decisions according to the trust deed and can assign policy segments to beneficiaries.
- **Investment Advisers** – Professional advisers can provide guidance on investment selections and ongoing portfolio management within the bond structure.
- **Discretionary Fund Managers** – Some bonds permit appointment of external investment managers to actively manage the underlying portfolio.

Are there minimum amounts that can be invested?

Offshore bonds typically require higher minimum investments and additional investment minimums than other investment wrappers, reflecting the sophisticated nature of offshore bonds and their suitability for investors with substantial assets.

Paying money into an Offshore Bond

Offshore bonds offer considerable flexibility for contributions:

- **Lump Sum Investments** – One-time contributions can be made at any point, subject to minimum investment thresholds (typically £20,000 to £100,000).
- **Additional Premiums** – Subsequent investments (top-ups) can generally be made at lower minimum thresholds.
- **Regular Contributions** – Some providers facilitate systematic investment plans, though offshore bonds are more commonly used for lump sum investing.
- **In-Specie Transfers** – Direct transfers of existing assets are generally not permitted; contributions must be made in cash, although some specialised providers may offer limited in-specie options.

Contributions to another person's offshore bond may have inheritance tax implications as they are typically treated as potentially exempt transfers or chargeable lifetime transfers, depending on the specific arrangement.

Can I transfer existing investments into an Offshore Bond?

Unlike General Investment Accounts, direct in-specie transfers of existing investments into offshore bonds are

generally not possible. However, specialised arrangements may be available through certain providers:

- **Cash Transfer** – The standard approach involves selling existing investments, transferring cash into the bond, then repurchasing desired investments within the bond structure.
- **Specialised Custodian Arrangements** – Some offshore bond providers offer specialised solutions for high-value portfolios where investments can be transferred without selling, though this typically involves complex custodial arrangements.
- **Existing Bond Transfers** – It is possible to transfer an existing offshore bond to a new provider through a process known as a Section 51 assignment, which doesn't trigger a chargeable event for tax purposes.

The transfer process typically requires completion of specific transfer forms and may take several weeks depending on the complexity involved and the cooperation of both providers.

Can you make withdrawals from an Offshore Bond?

Offshore bonds offer considerable flexibility for accessing your investment:

- **5% Tax-Deferred Allowance** – You can withdraw up to 5% of your original investment each policy year without an immediate tax charge. This allowance is cumulative, so unused amounts can be carried forward.
- **Regular Withdrawals** – Most providers offer automated regular withdrawal facilities delivering fixed monthly, quarterly, half-yearly, or annual payments.
- **Partial Surrenders** – You can withdraw specific amounts above the 5% allowance, though this may trigger a chargeable event and potential tax liability.
- **Full Surrenders** – You can fully surrender your bond or individual segments at any time, subject to any early surrender charges.
- **Policy Segment Surrenders** – Surrendering complete individual policies (segments) can be more tax-efficient than partial surrenders across all segments.
- **Assignments** – You can assign (transfer ownership of) segments to others, which may achieve specific tax planning objectives.

Any withdrawals exceeding the cumulative 5% allowance, or full surrenders, will create a chargeable event and potentially an income tax liability. The precise tax treatment

will depend on your individual circumstances at the time of the event.

Why choose an Offshore Bond?

An offshore bond can be particularly advantageous if you:

- **Seek tax-efficient growth** – The gross roll-up environment allows investments to grow without immediate tax deductions, potentially enhancing long-term returns.
- **Require tax planning flexibility** – The ability to control when and how withdrawals are taken provides significant tax planning opportunities, especially for individuals whose tax status may change over time.
- **Have maxed out tax-efficient wrappers** – For those who have utilised their annual ISA allowance and pension contribution limits, offshore bonds provide an alternative tax-efficient investment vehicle without upper contribution limits.
- **Need estate planning solutions** – Offshore bonds can be held in various trust structures or assigned to beneficiaries, supporting sophisticated inheritance planning.
- **Want investment diversification** – Access to a broad spectrum of international investments, including some not readily available in onshore products.
- **Desire portability** – Offshore bonds can be particularly suitable for internationally mobile clients whose tax residency may change.
- **Prefer simplified tax reporting** – Despite their complexity, offshore bonds simplify tax reporting as there's no need to declare income or gains until a chargeable event occurs.
- **Require probate avoidance** – Bonds written on multiple lives can continue after the death of the policyholder, potentially avoiding probate delays.

What are the tax implications of an Offshore Bond?

Offshore bonds offer distinctive tax advantages that make them particularly valuable for certain investors:

- **Gross Roll-Up** – Investments grow free of UK Income and Capital Gains Tax within the bond (though some withholding taxes may apply to certain international investments). This tax-privileged growth environment can significantly enhance long-term returns through compounding.
- **Tax Deferral** – No UK tax is payable until a chargeable event occurs (such as full surrender, death of last life

assured, or withdrawals exceeding the 5% allowance), allowing you to control when tax becomes payable.

- **5% Tax-Deferred Withdrawal Allowance** – You can withdraw up to 5% of your original investment each policy year without an immediate tax charge. This allowance is cumulative and can be carried forward if unused, providing up to 20 years of tax-efficient income.
- **Top-Slicing Relief** – When calculating tax on gains, top-slicing relief may reduce your liability by spreading the gain over the number of complete years the bond has been held, potentially reducing the applicable tax rate.
- **Assignment Benefits** – Bonds can be assigned (gifted) to others without creating an immediate tax charge, making them useful for intergenerational wealth transfer.
- **Time Apportionment Relief** – If you've been non-UK resident during the bond's lifetime, time apportionment relief can reduce the taxable portion of any gain.
- **Corporate Ownership** – For bonds held by companies, different tax rules apply that may offer advantages in certain circumstances.

It's important to note that tax treatment depends on individual circumstances and may change in the future. The complex nature of offshore bond taxation makes professional advice essential.

Why might an Offshore Bond not be suitable?

Despite their advantages, offshore bonds are not appropriate for every investor:

- **Tax Treatment of Gains** – Gains from offshore bonds are subject to Income Tax rather than the potentially lower Capital Gains Tax, which may be disadvantageous for some investors.
- **Product Charges** – Offshore bonds typically have higher charges than direct investments or other wrappers like ISAs, potentially reducing returns over time.
- **Complexity** – The tax rules surrounding offshore bonds are complex, particularly for assignments, partial surrenders, and trust arrangements.
- **Currency Risk** – Investing in non-sterling assets exposes you to currency fluctuations which could impact returns.

- **Short-Term Investment Horizon** – The charging structure of most offshore bonds makes them unsuitable for investments under 5-7 years.
- **Limited Protection** – While most offshore jurisdictions offer investor protection schemes, these may not be as comprehensive as UK protection arrangements.
- **Tax Changes** – Future changes to tax legislation could impact the benefits of offshore bonds.

Before investing, it's essential to assess whether an offshore bond aligns with your specific circumstances, investment objectives, and risk tolerance.

Managing Tax Liabilities Within an Offshore Bond

While offshore bonds already offer significant tax advantages through gross roll-up and the 5% withdrawal allowance, there are additional strategies that can optimise their tax efficiency and enhance your overall returns.

Time Your Chargeable Events Strategically

- **Personal Allowance Planning** – Consider surrendering policies or taking withdrawals in tax years when your income is lower, potentially utilising your personal allowance to minimise or eliminate tax on gains.
- **Basic Rate Band Management** – Time surrenders to fall within your basic rate tax band where possible, as the difference between basic rate (20%) and higher rate (40%) taxation can significantly impact net returns.
- **Retirement Planning** – Coordinate bond surrenders with retirement, when income levels often decrease, potentially reducing the tax rate applicable to any gains.
- **Policy Segmentation** – Surrender complete segments rather than taking partial surrenders across all segments, as this can be more tax-efficient and provides greater control over the timing and size of chargeable events.

Use Assignment Strategies

- **Spousal Assignments** – Consider assigning segments to a spouse or civil partner who has unused personal allowance or basic rate band capacity before surrender, as these assignments are not chargeable events.
- **Family Member Assignments** – Similarly, segments can be assigned to adult children or other family

members in lower tax brackets, potentially reducing the overall tax burden.

- **Trust Assignments** – Strategic assignments to appropriate trust structures can support both tax planning and wider estate planning objectives.

Coordinate With Other Tax Wrappers

- **Offshore Bond and ISA Strategy** – Use ISAs for income-generating investments and offshore bonds for growth-oriented investments to minimise immediate income tax liabilities.
- **Pension Coordination** – Consider the interaction between pension income and potential bond gains to manage your overall tax position effectively.
- **Asset Location Strategy** – Adopt a holistic view of your investment portfolio across all wrappers to place each asset class in its most tax-efficient environment.

International Considerations

- **Overseas Workday Relief** – If you're coming to the UK for employment, consider establishing an offshore bond before UK residence to potentially benefit from favourable tax treatment.
- **Non-Domicile Planning** – While offshore bonds have historically supported remittance-based planning for non-UK domiciled individuals, upcoming tax reforms reduce this advantage. However, they may still offer tax deferral and estate planning benefits within broader wealth strategies.

Corporate Investment Strategies

- **Corporate Ownership** – For companies, offshore bonds can offer particular advantages including potential deferral of corporation tax and simplified reporting.
- **Corporate Exit Strategies** – Bonds held by companies for at least 10 years may benefit from indexation relief on surrender, potentially reducing the taxable gain.

Can an Offshore Bond be used for Estate Planning?

Offshore bonds can form an effective component of a comprehensive estate planning strategy:

- **Trust Planning** – Bonds can be written in trust from inception or assigned to trustees later, potentially reducing inheritance tax liability and providing control over asset distribution.

- **Beneficiary Nomination** – Some offshore bonds allow beneficiary nomination, enabling proceeds to pass directly to named individuals upon death.
- **Probate Avoidance** – Bonds written on multiple lives can continue after the policyholder's death, avoiding probate delays on those assets.
- **Controlled Access** – Trustees can manage assets for beneficiaries who may not be ready to handle substantial sums directly.
- **Generational Planning** – Bond segments can be assigned to younger family members, potentially transferring assets in a tax-efficient manner.
- **Loan Trusts** – Specialised arrangements allow access to capital while establishing a trust structure for potential inheritance tax benefits.
- **Discounted Gift Trusts** – These structures can provide regular withdrawals while potentially reducing the inheritance tax value of the gift.

Estate planning is inherently complex, with significant implications for both you and your beneficiaries. Professional advice tailored to your specific circumstances is essential when using offshore bonds as part of your wider succession planning.

What happens at death?

The outcome when a policyholder dies depends on how the bond is structured:

- **Single Life Bonds** – The bond ends on death of the life assured, and the death benefit (typically 100.1% or 101% of the surrender value) becomes payable to the policyholder or their estate.
- **Multiple Lives Assured** – If the bond is written on multiple lives, it continues until the death of the last life assured, giving potential continuity across generations.
- **Joint Ownership** – For jointly owned bonds, ownership typically passes to the surviving owner(s).
- **Trust-Held Bonds** – If the bond is held in trust, control passes according to the trust deed, potentially outside the deceased's estate for inheritance tax purposes.
- **Tax Implications** – Death of a life assured resulting in payment of policy proceeds is a chargeable event, potentially creating an income tax liability on any gain.

- **Capital Redemption Bonds** – These continue for their fixed term (typically 99 years) regardless of deaths, offering continuity for estate planning.

The precise process varies by provider and bond structure, so it's important to understand the specific terms of your arrangement.

Will I be charged a fee?

If you are an existing client, your Offshore Bond will be managed under your existing service agreement and fee structure, alongside your main investment portfolio.

Who are the Offshore Bond Providers?

Offshore bonds are typically issued by established international life insurance companies based in well-regulated jurisdictions:

- **Isle of Man** – A popular location offering strong regulatory oversight and policyholder protection (up to 90% of liabilities under the Policyholders' Compensation Scheme).
- **Dublin (Ireland)** – Benefits from EU membership with robust regulatory standards and proximity to the UK.
- **Luxembourg** – Known for sophisticated structures with specific policyholder asset segregation rules and multi-currency options.
- **Other Jurisdictions** – Some providers operate from locations such as Bermuda, Guernsey, or Jersey, each with distinctive regulatory features.

Key factors to consider when selecting a provider include, the providers financial strength and reputation, range of investment options, fee structure and transparency, service quality and online access, regulatory jurisdiction and investor protection arrangements

Will I be charged a fee by the offshore bond provider?

Fee structures vary significantly between providers. Offshore bonds involve several layers of charges:

- **Initial Charges** – May include product setup fees and initial allocation rates that reduce the amount invested.
- **Annual Administration Fees** – Ongoing charges for the bond wrapper, typically between 0.15% and 1% annually.
- **Dealing Charges** – Fees for buying and selling underlying investments, which vary by provider and investment type.

- **Early Surrender Charges** – Some bonds impose penalties for withdrawals within an initial period (typically 5-8 years).
- **Additional Service Fees** – Charges for services such as fund switches, valuations, or specialised investment options.

Where are your Offshore Bond assets held?

Where the offshore provider permits assets to be held with an external custodian, we have strategically chosen to partner with AJ Bell Securities Ltd, a specialist Custodian, to administer the regulatory and operational aspects of our investment offering.

This deliberate separation of responsibilities offers several distinct advantages:

- **Enhanced Security** - Your assets benefit from the robust safeguarding protocols of a dedicated custodian, with assets held separately from our firm's balance sheet.
- **Specialised Expertise** - Our custodian brings focused regulatory expertise in settlement and administration, ensuring continuous compliance with evolving tax legislation.
- **Investment Focus** - This partnership allows our investment professionals to concentrate exclusively on portfolio management.

AJ Bell Securities Limited are one of the largest providers of investment platforms and stockbroker services in the UK, is a member of the London Stock Exchange and regulated by the Financial Conduct Authority.

This guide is not personal advice. If you're at all unsure of the suitability of an investment for your circumstances, please ask your usual Tacit contact for advice.

Important things to remember

All the solutions we offer involve some form of investment risk and you should be aware that the value of investments in your offshore bond can fall in value, so you could get back less than the original capital you invested.

Tax rules and allowances may change in the future and the benefits of offshore bonds depend on your individual circumstances.

Offshore bonds are complex products that require careful consideration of their benefits and limitations in the context of your overall financial plan.

The costs associated with offshore bonds can be higher than other investment options, potentially impacting returns over time.

Whilst the rules we refer to are those that currently apply, they can change over time and their value and how you are taxed will depend on your personal circumstances, and tax rules at the time.

You have sole responsibility for the management of your tax and legal affairs including all applicable tax filings and payments and for complying with the applicable laws and regulations.

We may provide guidance on using tax-efficient structures such as making use of tax allowances. We are not specialist tax advisers and will not provide you with tax or legal advice and recommend that you obtain your own independent tax and legal advice, tailored to your individual circumstances.

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