

Ireland – A Domicile for Dutch CLOs

CLO issuers, lawyers, large banks and professional service providers have been informed by the Dutch Tax Authority that an annual 21% tax will be applied to the management fee of CLO vehicles, and backdated to April 2019.

The repercussions of this on investor equity is obvious, and as such, CLO SPVs, collateral managers, and other service providers and investors must consider their positions.

Consider Ireland

Ireland, also being a destination of domicile for a large number of CLO's offers a real alternative to the Netherlands. It does not levy a similar VAT charge, so it should provide a more competitively priced service offering.

Vistra Ireland, with a presence in both the Netherlands and Ireland for over 20 years is a full service Corporate Service Provider and would welcome the opportunity to speak with you around our CLO offering.

Vistra Ireland: How we can help

Vistra Ireland offer a full suite of corporate services to CLO's wanting to set up in Ireland:

- SPV incorporation
- Director appointment
- Registered office
- Full co-sec offering
- SPV financial statements preparation.

In addition, through our Share Trustee offering, we can support the bankruptcy remote status (usually a requirement) by having our Share Trustee entity hold the share of the issuers on Trust.

About Vistra

Vistra is a leading global provider of fund, corporate, private client and capital market administration, advisory and compliance services. Working seamlessly with our clients and with each other, we find new ways to transform our expertise into real world business impact. It's how we make a difference, and become the trusted, long-term partners our clients need.

- Over 4,500 employees globally covering 45 jurisdictions
- Over US\$369 billion of alternative investment fund assets under administration
- Serving over 100 Fortune 500 companies.

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