



UK Property invested in the Offshore Bond – List of investments impacted by legislation

On 24 April 2020 we issued an [update](#) to advisers about UK property rich investments in the Novia offshore bond. We are now (7 July 2020) able to give you more details about the selling of offshore bond investments. Our offshore bond provider, RL360, has issued a list of investments held within the offshore bond that they have identified as being impacted by the recent legislation. This list is shown here below. If any of your clients have offshore bond holdings in investments that appear on this list, those holdings need to be sold. Any units remaining by the end of November will be automatically disinvested at RL360's request. The funds will continue to be available in the SIPP, ISA and GIA, but there may be CGT liabilities arising from GIA disposals by non-UK investors.

Investment models that apply to the offshore bond should be updated to ensure they do not include the investments on the list. We appreciate that some of the funds on the list are currently suspended. As and when fund managers lift those suspensions, we will notify advisers by email, as we do for all fund suspension events. If you are looking to disinvest a suspended fund at the earliest opportunity, we encourage you to keep an eye out for further communications relating to that fund. RL360's message is also given below. If you have any questions about their list, their contact email address is csc@rl360.com.

ISIN	SEDOL	Name
GB00BTLX1C92	BTLX1C9	Aberdeen UK Property A Acc
GB00BTLX1D00	BTLX1D0	Aberdeen UK Property A Inc
GB00BTLX1M90	BTLX1M9	Aberdeen UK Property Feeder UT A Acc
GB00BTLX1N08	BTLX1N0	Aberdeen UK Property Feeder UT A Inc
GB00BTLX1P22	BTLX1P2	Aberdeen UK Property Feeder UT I Acc
GB00BTLX1Q39	BTLX1Q3	Aberdeen UK Property Feeder UT I Inc
GB00BTLX1R46	BTLX1R4	Aberdeen UK Property Feeder UT J Acc
GB00BTLX1S52	BTLX1S5	Aberdeen UK Property Feeder UT J Inc
GB00BTLX1F24	BTLX1F2	Aberdeen UK Property I Acc
GB00BTLX1G31	BTLX1G3	Aberdeen UK Property I Inc
GB00BJJPTT09	BJJPTT0	ARC TIME Commercial Lng Inc Fdr I NetAcc
GB00BJJPVD86	BJJPVD8	ARC TIME Commercial Lng Inc Fdr Q NetAcc
GB00BJJPTY51	BJJPTY5	ARC TIME Commercial Long Inc B Net Acc
GB00BJJPTZ68	BJJPTZ6	ARC TIME Commercial Long Inc C Gross Inc
GB00BYYZ0S69	BYYZ0S6	Aviva Inv UK Prpty Fdr Acc 1 GBP Acc
GB00BYYZ0W06	BYYZ0W0	Aviva Inv UK Prpty Fdr Acc 2 GBP Acc
GB00BYYZ1N89	BYYZ1N8	Aviva Inv UK Prpty Fdr Inc 1 GBP Inc
GB00BYYZ2464	BYYZ246	Aviva Inv UK Prpty Fdr Inc 2 GBP Inc
GB00BYYYYXW82	BYYYYXW8	Aviva Investors UK Property 1 GBP Acc
GB00BYYYYD68	BYYYYD6	Aviva Investors UK Property 1 GBP Inc
GB00BYYYYX64	BYYYYX6	Aviva Investors UK Property 2 GBP Acc
GB00BYYYYZ110	BYYYYZ11	Aviva Investors UK Property 2 GBP Inc
GB00B6118210	B611821	BMO UK Property 1 Acc
GB00B620FM64	B620FM6	BMO UK Property 1 Inc
GB00B830G150	B830G15	BMO UK Property 2 Acc
GB00B6449M48	B6449M4	BMO UK Property 2 Inc
GB00BWZMHHM55	BWZMHHM5	BMO UK Property Feeder 2 Acc
GB00BWZMHL49	BWZMHL4	BMO UK Property Feeder 2 Inc
KYG1527A1022	9780441	British Development Land Fund

IM00B3K9N975		IS UK Property GBP FR
GB00BP46GC27	BP46GC2	Janus Henderson UK Pty PAIF A Acc
GB00BP46GD34	BP46GD3	Janus Henderson UK Pty PAIF A Inc
GB00BYP82B13	BYP82B1	Janus Henderson UK Pty PAIF Feeder A Acc
GB00BYP82996	BYP8299	Janus Henderson UK Pty PAIF Feeder A Inc
GB00BYP82D37	BYP82D3	Janus Henderson UK Pty PAIF Feeder I Acc
GB00BYP82C20	BYP82C2	Janus Henderson UK Pty PAIF Feeder I Inc
GB00BP46GF57	BP46GF5	Janus Henderson UK Pty PAIF I Acc
GB00BP46GG64	BP46GG6	Janus Henderson UK Pty PAIF I Inc
GB00BK6MJG80	BK6MJG8	Kames Property Inc Feeder(Acc) GBP B Acc
GB00BK6MJH97	BK6MJH9	Kames Property Inc Feeder(Inc) GBP B Inc
GB00BK6MJC43	BK6MJC4	Kames Property Income GBP B Gross Inc
GB00BK6MJD59	BK6MJD5	Kames Property Income GBP B Net Acc
GB00BK6MJF73	BK6MJF7	Kames Property Income GBP B Net Inc
GB00BK35DX56	BK35DX5	L&G UK Property F Acc
GB00BLM78907	BLM7890	L&G UK Property Feeder C Inc
GB00BK35F622	BK35F62	L&G UK Property Feeder F Acc
GB00BK35F408	BK35F40	L&G UK Property Feeder I Acc
GB00BK35F390	BK35F39	L&G UK Property Feeder I Inc
GB00BK35F283	BK35F28	L&G UK Property Feeder R Acc
GB00BK35F176	BK35F17	L&G UK Property Feeder R Inc
GB00BK35DV33	BK35DV3	L&G UK Property I Acc
GB00BK35DT11	BK35DT1	L&G UK Property I Inc
GB00BK35DS04	BK35DS0	L&G UK Property R Acc
GB00BK35DR96	BK35DR9	L&G UK Property R Inc
GB00B8FSZ434	B8FSZ43	M&G Feeder of Property GBP A Acc
GB00B8FWH509	B8FWH50	M&G Feeder of Property GBP A Inc
GB00B7KL5730	B7KL573	M&G Feeder of Property GBP D Acc
GB00B7SX7S61	B7SX7S6	M&G Feeder of Property GBP I Acc
GB00B842HT59	B842HT5	M&G Feeder of Property GBP I Inc
GB00B8FVGB64	B8FVGB6	M&G Feeder of Property GBP R Acc
GB00B8G41W07	B8G41W0	M&G Property Portfolio GBP A Acc
GB00B8G9TT83	B8G9TT8	M&G Property Portfolio GBP A Inc
GB00B89PNJ11	B89PNJ1	M&G Property Portfolio GBP D Acc
GB00B8FQVP09	B8FQVP0	M&G Property Portfolio GBP D Inc
GB00B8FYD926	B8FYD92	M&G Property Portfolio GBP I Acc
GB00B89X8P64	B89X8P6	M&G Property Portfolio GBP I Inc
GB00B89MXM58	B89MXM5	M&G Property Portfolio GBP R Acc
GB00B896N165	B896N16	M&G Property Portfolio GBP X Inc
GB00B8W39380	B8W3938	MGTS St Johns High Income Property Inc
GB00B66HFJ00	B66HFJ0	Royal London Property A Acc
GB00B8206385	B820638	Schroder UK Real Estate Fund Feeder Inc
GB00B3DLGM45	B3DLGM4	Scottish Widows HIFML UK Property I
GB00BYPHPB97	BYPHPB9	SLI UK Real Estate Acc Feeder Inst Acc
GB00BYPHPD12	BYPHPD1	SLI UK Real Estate Acc Feeder P 1 Acc
GB00BYPHP973	BYPHP97	SLI UK Real Estate Acc Feeder Ret Acc
GB00BYPHPK88	BYPHPK8	SLI UK Real Estate Inc Feeder Inst Inc
GB00BZ008552	BZ00855	SLI UK Real Estate Inc Feeder Inst S Inc
GB00BYPHPL95	BYPHPL9	SLI UK Real Estate Inc Feeder P 1 Inc
GB00BYPHPJ73	BYPHPJ7	SLI UK Real Estate Inc Feeder Ret Inc
GB00BJZ2TG29	BJZ2TG2	SLI UK Real Estate Institutional Acc

GB00BYPHP536	BYPHP53	SLI UK Real Estate Platform 1 Acc
GB00BYPHP643	BYPHP64	SLI UK Real Estate Platform 1 Inc
GB00BJFL1522	BJFL152	SLI UK Real Estate Retail Acc
GB00BJFL1639	BJFL163	SLI UK Real Estate Retail Inc
GB00B1KHL374	B1KHL37	St James's Place Property Acc
GB00B1KHL598	B1KHL59	St James's Place Property Inc
GB00B0G26Q77	B0G26Q7	The Frontier Commercial Property
GB00B0G26R84	B0G26R8	The Frontier Commercial Property GBP Acc NAV
GB00B0G26T09	B0G26T0	The Frontier Commercial Prpty GBP Acc NAV
GB00BQ3G0Y06	BQ3G0Y0	Threadneedle UK Prpty Authrsd GBP InsAcc
GB00BQ3G0Z13	BQ3G0Z1	Threadneedle UK Prpty Authrsd GBP InsInc
GB00BQ1YHS94	BQ1YHS9	Threadneedle UK Prpty Authrsd Invmt IGA
GB00BQ1YHT02	BQ1YHT0	Threadneedle UK Prpty Authrsd Invmt IGI
GB00BQ1YHV24	BQ1YHV2	Threadneedle UK Prpty Authrsd Invmt INA
GB00BQ1YHW31	BQ1YHW3	Threadneedle UK Prpty Authrsd Invmt INI
GB00BQ1YHQ70	BQ1YHQ7	Threadneedle UK Prpty Authrsd Invmt RNA
GB00BQ1YHR87	BQ1YHR8	Threadneedle UK Prpty Authrsd Invmt RNI
GB00B9LVKM66	B9LVKM6	TIME Freehold Inc Authorised B Net Acc
GB00B9LVL566	B9LVL56	TIME Freehold Inc Authorised D Net Inc
GB00B932TK89	B932TK8	TIME Freehold Inc Authorised F Net Acc
GB00B9D84M33	B9D84M3	TIME Freehold Inc Authorised H Net Inc
GB00B94RFB51	B94RFB5	TIME Freehold Inc Authrd Fdr I Net Acc
GB00B94RFF99	B94RFF9	TIME Freehold Inc Authrd Fdr J Net Inc
GB00B94RFG07	B94RFG0	TIME Freehold Inc Authrd Fdr K Net Acc
GB00B44VX301	B44VX30	TM Home Investor B Retl Net
GB00B95VYK84	B95VYK8	TM Home Investor C Unbnd Gross
GB00B95V2K41	B95V2K4	TM Home Investor Feeder Retail Unbnd Acc

Message from RL360

Dear Adviser,

RE: 'UK Property Rich' Collective Investment Vehicles

This is a further communication in respect of the change in UK tax legislation that took effect from the 6 April 2019 and which applies to Non-Residents holding interests in UK Property Rich Collective Investment Vehicles (CIV's).

The following information is only relevant to Advisers with policy/plan owners who have exposure to funds deemed to be UK property Rich.

A list of those funds is provided at the end of this communication. Please note that this list reflects those funds which are held by RL360 policy/plan holders only.

If your client has an investment with another company, they may be linked to different funds which are also affected.

Where a policy/plan is not linked to any of the funds listed in this communication, NO further action is required in respect of the RL360 policy/plan.

Background

Over the last few years, the UK Government have been introducing new legislation to equalise the tax treatment of UK and non-UK residents where there is a disposal of UK residential/non-residential property and UK land.

From the 6 April 2019, legislation extended UK capital gains tax to disposals of UK property where it is held within a Collective Investment Vehicle and the investor is a Non-UK resident.

Impact

As a Non-UK resident company, this legislation applies to RL360 as the underlying investments held in our products are legally owned by us and not the policy/plan owner.

How does this effect policy/plan owners?

When a 'UK property rich' CIV is sold or transferred out of a policy/plan, any gain on the CIV since the 6 April 2019 (or the CIV purchase date if after the 6 April 2019) may be subject to UK corporation tax, which is currently charged at a rate of 19%.

RL360 would be liable for any and tax and would reserve the right to pass that on to policy/plan owners that realised a gain. Market conditions have meant that to date, it hasn't been necessary to do this.

What next?

Throughout 2019/early 2020, like other businesses, we engaged with numerous industry bodies who were lobbying HMRC/HM Treasury for an exemption or at the very least changes to the legislation.

Unfortunately, it appears that no changes are likely in the short term and so the administrative complexities for us as a business and the potential for double taxation on our policy/plan owners remains unchanged.

To date, we have allowed policy/plan owners to remain invested in this particular sector however, we must now ask that all positions are sold as soon as possible but by 30 November at the latest.

We appreciate that at this time, many of the funds affected are actually suspended and so positions cannot be liquidated. In those circumstances, we would ask that redemptions are placed as and when possible.

Just to clarify once more, where Policy/Plan owners have no exposure to the funds listed, **NO** further action is required.