SOVEREIGN ...

SOVEREIGN GROUP RESIDENCY AND CITIZENSHIP PLANNING

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About Sovereign

Sovereign opened its first office in Gibraltar in 1987 and has since grown into one of the largest independent corporate and trust service providers in the world. We currently manage over 20,000 structures for a wide variety of clients – companies, entrepreneurs, private investors or high net worth individuals (HNWIs) and their families – and have assets under administration in excess of GBP £20 billion.

Our Personal Wealth services assist families and entrepreneurs to structure their assets in a way that will help to grow their wealth now and preserve it for future generations. We advise on all aspects of the design and implementation of structures, using trusts, foundations, companies and funds, in domestic as well as overseas jurisdictions, to hold assets and investments for secure, efficient wealth and succession planning.

While some of our clients are based only in a single location, many are international families with assets and family members spread across different countries. We have broad experience in managing trusts and estates with complex structures involving assets and beneficiaries in multiple jurisdictions and the legal, tax and compliance issues that arise when the laws of several jurisdictions may apply.

We also provide the support to maximise opportunities and achieve long-term sustainability, from full family office solutions to assistance with tax and regulatory compliance. This includes, but is not limited to: residency, immigration and citizenship, asset management, accountancy, foreign property ownership, retirement planning, insurance, yacht and aircraft registration, as well as specialist tax advice.



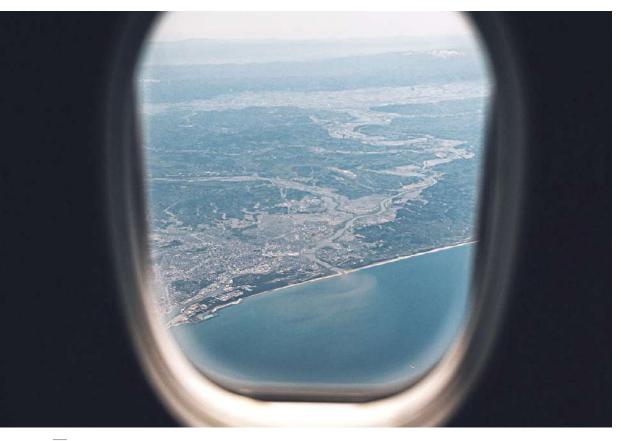
Sovereign Group a Holistic Approach to International Residency and Citizenship Planning

Acquiring an alternative or second residency or citizenship provides families with a broad spectrum of lifestyle, business, investment, and tax benefits and has become an increasingly popular choice worldwide.

Residency and Citizenship planning options are however continuously evolving, with the creation of new government programmes, the incorporation of additional options and benefits within existing programmes and the removal of programmes no longer considered beneficial to the economy or society.

This combined with the fact that no two clients' requirements and objectives are the same, means Residency and Citizenship planning must be approached holistically, not from the mindset that one or two solutions fit all.

The Sovereign Group monitors the market to ensure we are fully knowledgeable in and provide access to a comprehensive range of residency, citizenship, and tax residency solutions. Our extensive network of offices, experienced local teams and professional service partners ensure that we are best placed to assist clients with the identification, development and implementation of the most suitable overall strategy for their needs.



The Importance of Residency and Citizenship Planning for Individuals, their Families, Businesses and Host Governments

In a world of political uncertainty, closed economic borders with restrictions on travel and the movement of assets, internationally mobile individuals, their families and businesses have developed a genuine need for liberating, flexible solutions. Acquiring a second or alternative residency or citizenship provides families with a broad spectrum of lifestyle, business, investment and tax benefits and has become an increasingly popular choice worldwide.

Many governments have taken notice of increased demand from affluent, self-sufficient, and experienced businesspeople, who wish to create more options and opportunities for themselves and their families. They understand and appreciate that offering residency and citizenship programmes enable them to:

- Secure much-needed foreign investment without debt
- 2. Attract people with proven business success and valuable networks
- 3. Create local employment and associated economic benefits
- 4. Enrich their economies and citizens.





Residency Programmes

The Sovereign Group advises clients on a wide range of residency programmes, catering for most personal requirements and budgets. Qualifying applicants receive a local residence permit and the following additional benefits:

- The right to reside, settle and stay indefinitely in your chosen country.
- · Option to include spouse and qualifying dependents
- Greater freedom of movement within cooperating countries
- No language requirements
- · Access to high quality educational institutions and medical facilities
- Multiple personal and corporate tax benefits
- Eligibility to apply for citizenship by naturalisation in the future.

Types of Residency Programmes

Government-approved residency programmes enable foreign nationals to gain full residency rights in a new country in return for making capital investment, establishing a local business and/or injecting capital into the economy. Programmes can be categorized as follows:

- **1. Residency by Investment (RBI) Programmes** are often referred to as 'Golden Visas' and provide individuals and their dependents with a residence permit and a variety of associated benefits in exchange for a wide range of investment and donation options. RBI Programmes usually have low minimum stay requirements, they are therefore ideal for establishing an alternative or second place of residence.
- **2. Financially Independent Visa Programmes** provide residence permits to applicants who can demonstrate a regular income and/or personal wealth above a specified amount. They generally require you to make the chosen country your primary place of residence and tax residence.
- **3. Business Start Up, Investment, and Incubation Programmes** provide residence permits to applicants who establish or invest in an existing business, creating local economic activity and employment opportunities in the chosen country. In some instances, the amount needed as an initial investment can be relatively low.
- **4. Tax Residency Programmes** provide preferential rates for new residents and/or non-domiciled individuals who establish tax residency. Some programmes also provide residency status whilst, if need be, others can be established in conjunction with a residency programme listed above.



The Republic of Cyprus an Introduction

Cyprus lies at the crossroads of three continents, occupying a strategic position for access to Europe, Asia and Africa. Its two international airports – Larnaca and Paphos – make Cyprus an excellent platform for travelling throughout Europe and the rest of the world.

This location, together with its membership of the European Union, its culture and advanced infrastructure all make Cyprus a very attractive destination for those looking to establish a European business and/or your primary or secondary place of residence. It also has one of the most attractive tax regimes in Europe.

Its climate, with more than 320 days of sunshine per year, offers the archetypal Mediterranean lifestyle. One of the safest countries in Europe, Cyprus also boasts advanced healthcare services and a great selection of international schools, making it an ideal for raising a family.

Residency by Investment Programme

PERMANENT RESIDENCY PROGRAMME (PRP) - 'FAST TRACK'

The Cyprus Permanent Residence Programme (PRP) 'Fast Track' Visa provides successful applicants with permanent residence status in approximately two months. This status is valid for life, can be passed on to dependants and requires holders to visit Cyprus at least once every two years.

To qualify applicants are required to invest €300,000 invested into a local qualifying property, investment fund or Cypriot-based company employing a minimum of five local employees.

They are also required to demonstrate they have a secure annual income of at least €50,000, have local private medical insurance, and no criminal record.

Financially Independent Visa Programmes

TEMPORARY RESIDENCE PERMIT

The Cyprus Temporary Residence Permit is an annually renewable self-sufficiency visa that allows an individual and their qualifying dependants, to live in Cyprus as a visitor, without employment rights.

To qualify applicants are required to rent or purchase a local residential property, have a minimum annual income of €24,000 sourced outside Cyprus, have local private medical insurance, and no criminal record.

It is also essential that each permit holder does not stay out of the country for no more than three months at a time, as this could result in the permit being cancelled.

Business Start Up, Investment Programme

A CYPRUS FOREIGN INTEREST COMPANY (FIC)

Generally, companies in the Republic of Cyprus are required to prioritise the employment of Cypriots and EU nationals before considering third-country nationals. However, Cyprus offers an exception to companies of foreign interest, allowing them to employ third-country nationals subject to specific requirements. This framework is particularly advantageous for third-country nationals who wish to incorporate their own company in Cyprus.

To qualify as a Cyprus Foreign Interest Company, it must be registered with the Cyprus Registrar of Companies and Intellectual Property, have true economic substance in Cyprus and the majority of shareholders should be third country nationals

The ultimate beneficial owner/s (UBO) must deposit at least €200,000 in the company's Cyprus bank account or, into the operation of its business e.g. the purchase of an office, equipment etc.

If the company has more than one UBO, the €200,000 can be deposited or invested by a single UBO or collectively.

Long Term Residency Permit

The Cyprus Long term residency permit is available to those who have held a valid residency permit for a minimum of five years.

The main qualification requirements are as follow:

- 1. Continuous Legal Residence in Cyprus for a minimum of five years.
- 2. Annual income, sourced from outside Cyprus, of a minimum of €24,000, which increases by 20% for a spouse and by 15% for each dependent child.
- 3. Demonstrate proficiency in the Greek Language having passed the A2 Greek language exam.
- 4. Demonstrate knowledge of the Culture and History of Cyprus having passed the exam.
- 5. A certificate of 'no criminal record' and of not being under investigation for criminal offences, that is attested by the relevant authorities.
- 6. Private Medical Insurance

The Cyprus Long term residency permit provides holders the following benefits:

- The right to work in Cyprus
- Access to various social services, including healthcare and education.
- The permit includes family members, the spouse and children.
- After five years of continuous legal residence, individuals may apply for permanent residency



Tax Residency Programmes

CYPRUS TAX RESIDENCY PROGRAMME

The Cyprus tax residency programme provides preferential tax incentives for qualifying non-domiciled individuals who are resident in Cyprus.

The main qualification requirements are as follows:

The 183-day Rule' – For an individual to be considered a tax resident of Cyprus under standard terms, they are required to be physically present in Cyprus for more than 183 days in a calendar year.

'The 60-day Rule' – A reduced physical presence requirement applies to individuals who:

- Do not reside in any other single state for more than 183 days within a tax year.
- Are not tax resident in any other country within a tax year.
- Maintain (by owning or renting) a permanent home in Cyprus within a tax year.
- Establish a business or are employed in Cyprus or holds an office with a Cyprus tax resident company at any time during the tax year.

TAX EFFICIENT BENEFITS

The Cyprus Tax Residency Programme provides non-domiciled tax residents the following tax benefits:

- · No income tax on dividend and interest related income
- No income tax on salaried services rendered outside Cyprus for more than 90 days in a tax year
- Low progressive income tax rates, with the first €19,500 being tax exempt
- A 50% income tax exemption on income earned through Cyprus based employment for 17 years, provided annual income exceeds €55,000 per annum*
- No tax on profits from disposal of securities, including shares, bonds, options and units in collective investment schemes
- A low corporate tax rate of 12.5% for Cyprus tax resident companies
- Tax free repatriation of profits and capital
- Overseas Pensions income that exceed the amount of €3,420 euro is taxed at only 5%.
- No Capital Gains Tax on assets other than immovable property situated in Cyprus
- No wealth taxes
- · No inheritance taxes
- No gift taxes

^{*}The exemption applies for a period of 17 tax years or until the provisions of this Article are abolished, whichever is the earlier. It is only available to those who have not been tax residency in Cyprus during the last 17 years.

Establishing Citizenship Through Naturalisation in Cyprus

To qualify for citizenship though naturalisation, applicants must have lived permanently in Cyprus for 7 years within a 10-year period.

On 23rd of November 2023, the Cypriot government introduced a new law which expedites the time frame for highly skilled professionals to 4 and 3 years. Non-EU nationals living in Cyprus who are highly qualified employees, either working for international companies as directors, key personnel, or specialists, will see their qualifying residency period reduced.

Qualifying professionals must also earn a minimum of €2,500 monthly, hold a university degree or equivalent, have two years' relevant employment experience and demonstrate a modest proficiency in Greek.

The qualification timeframes applicable under the new rules are reduced to:

- 4 years for A2 Greek language certificate holders
- 3 years for B1 Greek language certificate holders

To be eligible under the new legislation, applicants must also adhere to several essential requirements:

- A prerequisite is 12 months of legal, uninterrupted residence in Cyprus directly before applying, with allowable short absences not exceeding 90 days that do not break the continuity.
- A history of lawful residence in Cyprus for a total of three, four, or seven years within the last decade, tailored to the specific citizenship route chosen.





The Republic of Malta an Introduction

The Republic of Malta is a compact island nation at the heart of the Mediterranean, some 80 km to the south of Sicily. An archipelago composed of three main islands – Malta, Gozo and Comino – which have a combined population of around 500,000. The capital is Valletta.

Malta was admitted to the European Union in 2004 and joined the euro zone in 2008 and its two official languages are Maltese and English.

Malta International Airport, located 5km southwest of Valletta, serves all the Maltese Islands and offers direct flights to destinations all over Europe, as well as North Africa and the Middle East.

With a typically Mediterranean climate, Malta is also one of the world's safest countries, with a low crime rate, a welcoming, friendly population and progressive policies and laws. It also provides access to quality educational institutions and medical facilities, excellent business opportunities and infrastructure, and an excellent quality of life.

SOVEREIGN SERVICES LIMITED MALTA A LICENSED ENTITY

A licensed agent of the Residency Malta Agency (license number AKM-SOVE), Sovereign Services Limited Malta is best placed to advise, and support applicants who wish to establish residency and/or citizenship in Malta.

Residency by Investment Programme

MALTA PERMANENT RESIDENCE PROGRAMME (MPRP)

The Malta Permanent Residence Programme (MPRP) is available to non-EU, non-EEA and non-Swiss nationals. Successful applicants receive a MPRP certificate, which is valid for life. Provided all eligibility criteria continue to be met, the residency permit is renewable every five-years. The RMA will review, process and complete applications within four- to six-months of receipt.

To qualify, the main applicant is required to rent or purchase a property in Malta and make qualifying donations to the Maltese government.

Qualification Requirements

- 1. Establish a Residential Property in Malta:
- Either rent a property for a minimum of €14,000

Or

- Purchase a property for a minimum of €375,000 in Malta or Gozo.
- 2. Make a Direct Contribution to the government of Malta of:
- €60,000, if you choose to rent a property in Malta.

Or

- €30,000, if you choose to purchase a property in Malta.
- An additional €10,000 for each dependant included within the application.
- 3. Non-Refundable Administration Fee: €50,000.

- 4. Donation to a Voluntary Organisation:

 Donate €2,000 to a local registered philanthropic, cultural, sport, scientific, animal welfare or artistic nongovernmental organisation or society.
- 5. Provide evidence of Sufficient Net Worth: Be in receipt of a stable and regular financial income, sufficient to maintain themselves and their dependants, without the need to depend upon the social assistance system of Malta.

6. Provide evidence of Minimum Net Worth:

 Assets of at least €500,000, of which €150,000 is to be in the form of financial assets, such as stocks, bonds, funds or bank deposits.

Or

- Assets of at least €650,000, of which €75,000 is to be in the form of financial assets, such as stocks, bonds, funds or bank deposits.
- 7. Be a Fit-and-Proper Individual: All applicants must demonstrate that they do not have a criminal record or pose a potential threat to the national security, public policy, public health or public interest of Malta.
- 8. Provide evidence of Health Insurance: All applicants must be covered by a qualifying health insurance policy, which provides cover in Malta and the Schengen Area.



Business Start Up, Investment Programme

MALTA START-UP RESIDENCE PROGRAMME

The Malta Start-Up Residence Programme grants non-EU nationals a three-year residence permit, extendable for an additional five years. After five years' residency, applicants may also apply for long term residency in Malta.

The programme is specifically designed to facilitate the setting up of innovative start-ups and scale-ups in Malta, whilst supporting the immigration process of their founders, core employees and respective immediate family members.

It also offers support measures administered by Malta Enterprise, with an array of funding opportunities and assistance without the requirement to give up equity or company ownership.

A Malta-incorporated start-up company is required to have a minimum tangible investment and/or paid-up share capital of €25,000. In cases where more than four co-founders apply, an additional €10,000 needs to be placed per additional co-founder. The maximum number of eligible co-founders is six.

Founders and/or co-founders benefitting from this programme are required to have a physical and tangible presence in Malta, not only from a business perspective but also personally residing in and paying taxes in Malta.

Applicants must also have health insurance covering themselves and any dependants in Malta.

To qualify, founders and co-founders must have a concrete intention to develop and/ or expand a highly innovative business in Malta. The business cannot have been registered for more than seven years anywhere globally. They must also demonstrate that they are fit-and-proper and of good conduct and have sufficient financial resources to support their business, themselves, and any dependants.

Tax Residency Programmes

MALTA GLOBAL RESIDENCY PERMIT (GRP)

A remittance-based tax residency programme that provides both residency rights and tax residency benefits to non-EU nationals. The minimum annual tax payment in Malta is €15,000. This includes the first €100,000 of income that is remitted to Malta, while any income remittances above this threshold are taxed at 15%.

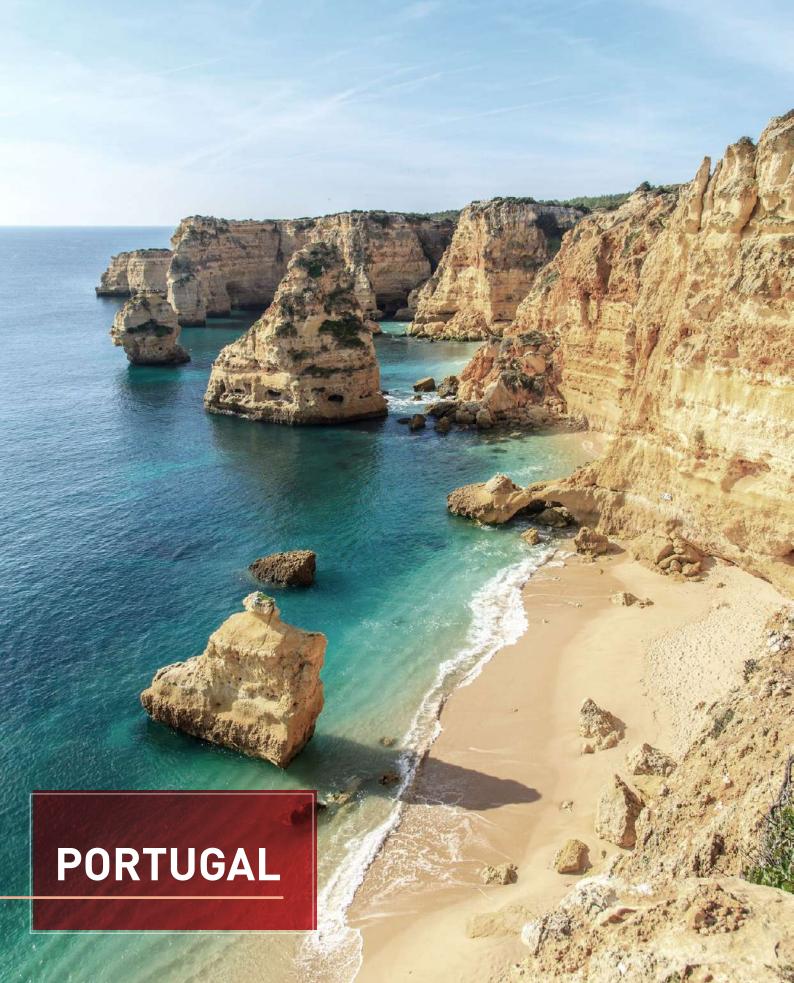
Malta does not apply income tax to foreignsourced income unless it is remitted to Malta, and there is no tax on capital and savings remitted to Malta and no capital gains tax on assets held outside Malta. Malta has no inheritance tax.

There is no minimum annual stay requirement, but Malta does require applicants to not reside in any other single country for more than 183 days each year.

THE RESIDENCY PERMIT (TRP)

Provides EU nationals with the same benefits as the GRP detailed above.





The Portuguese Republic - Portugal

A leading country for individuals and families seeking an alternate residence, Portugal provides a stable political and social environment, clear and transparent tax rules, good infrastructure, a favourable investment climate and an excellent quality of life.

Whether applicants wish to establish Portugal as their primary place of residence or a second or alternative option, Sovereigns highly experienced Portugal based team provide all-encompassing solutions to meet their individual requirements.

Residency by Investment Programme

PORTUGAL GOLDEN VISA RESIDENCE PERMIT (GVRP)

With an average minimum stay requirement of only 7 days per annum, the Portugal Golden Visa Residency Permit (GVRP) provides qualifying non-European investors and their qualifying dependants, full rights residency rights.

To qualify applicants can choose from one of the following qualification options:

- 1. Invest €500,000 in a Golden Visa qualifying investment fund
- 2. Establish a single-shareholder private limited company creating at least 10 sustainable jobs in Portugal.
- 3. Invest €500,000 towards the incorporation of a new company or into an existing company, creating 5 new jobs or maintaining a minimum of 10 jobs, 5 of which are permanent.
- 4. Donate €250,000 to an accredited institution conducting qualifying projects to, or in support of, artistic production, or the maintenance or recovery of cultural heritage.
- 5. Invest or donate €500,000 in an accredited public or private institution involved in qualifying scientific research that will benefit the national scientific and technological sector.

The minimum investment amounts applicable to options 4, and 5 may be reduced by up to 20% when applicable to entities in a low-density territory referred to as NUTS III, with less than 100 inhabitants per Km2 or a per capita GDP of less than 75% of the national average.

Financially Independent Visa Programme

Business Start Up, Investment Programmes

PORTUGAL PASSIVE INCOME (D7) VISA

The Portugal D7 or Passive Income Residency Visa provides residency status to non-EU citizens who intend to relocate to Portugal and who have a reasonable regular passive income.

The key requirement for making a successful application is proof of regular passive income, this may be derived from pension, rental, dividends or certain categories of investment income. Employment related income does not apply.

Minimum requirements vary depending upon the number dependants the main applicant wishes to include. In 2024 this equates to a minimum annual income of €9,120 for the main applicant, €4,560 for their spouse and €2,738 for each dependent child.

It is also advisable to hold a minimum amount equal to 12 months' income within a Portuguese bank account.

PORTUGAL IMMIGRANT ENTREPRENEUR (D2) VISA

The Portugal Immigrant Entrepreneur (D2) Visa is ideal for business professionals and entrepreneurs who wish to establish a new business or would like to establish a branch of their existing business in Portugal.

Applications are assessed on the local social and economic benefits of the proposed business activity, with preference given to those that create local employment opportunities.

To qualify applicants must provide:

- A structured business plan demonstrating the benefits of the proposed business, that is viable and sustainable
- Proof they have established a Portuguese company or have the financial resources to do so
- Evidence they have the financial ability to sustain the company and that economic substance is attributed to the company, aka employing individuals and performing activities in the country.
- The ability to support themselves and their dependants outside the proposed company*
- EU-wide health insurance cover

Applicants are required to spend a minimum of 4 months in the Portugal during the first year, and at least 6 months per year during each subsequent 3-year period.

^{*} In 2024 this equates to a minimum annual income of $\[\in \]$ 9,120 for the main applicant, $\[\in \]$ 4,560 for their spouse and $\[\in \]$ 2,738 for each dependent child

Tax Residency Programme

The implications of tax are attributed to any of the D visa's available. D7, D2, D8 and or D3 being the most common used. Hence tax guidance and assessments of these both on a personal and or corporate are essential.

The Golden Visa is not attributed to a taxable event if on a fund basis and the day count of less than 183 days is adhered to.

Guidance is provided by our highly experienced Portugal team, advising clients in Portugal for three decades on the fiscal landscape of the country.





Gibraltar

Gibraltar is ideally situated at the southern tip of the Iberian peninsular. Temperatures in Gibraltar range from 16°C in the winter to well above 30°C in summer and the country boasts an average of 300 days sunshine per year.

The territory is a dynamic international finance centre with an excellent infrastructure and buoyant financial services and gaming sectors. There has been a vast amount of work in the residential sector, with many new developments having been built to accommodate wealthy expatriates.

An increasing number of High-Net-Worth Individuals are taking advantage of the fiscal and lifestyle advantages attainable by establishing residency in Gibraltar.

Tax Residency Programmes

GIBRALTAR CATEGORY 2 RESIDENCY STATUS

To qualify as a Gibraltar Category 2 Resident applicants must have a minimum net wealth of £2 million and not have been resident in Gibraltar during the previous 5 years.

They are also required to purchase or rent an approved Category 2 residential property for their own exclusive use.

Generally, the applicant must not undertake business activities that compete with local entities that derive their income within Gibraltar. Certain local activities are permitted, with the approval of the Finance Centre and such income will be taxed separate to, and in addition to, the Category 2 tax.

CATEGORY 2 STATUS FISCAL BENEFITS (1 JULY 2024- 30 JUNE 2025)

- Capped annual tax liability based on income of £118,000
- Maximum annual tax of £42,380
- Minimum annual tax payable of £37,000
- Spouse and family income may be included

Individuals with Category 2 Status generally benefit from a cap on their Gibraltar tax liability with income tax payable only on the first £118,000 of annual taxable income. This gives rise to a maximum annual Category 2 tax liability of £42,380. As taxable income does not include, for example, capital gains, gifts or many types of investment income it is possible to lower the tax liability further. However, a minimum annual tax liability of £37,000 is applied, which is pro-rated in tax years of arrival and departure.

HIGH EXECUTIVES POSSESSING SPECIALIST SKILLS (HEPSS) STATUS

High Executives Possessing Specialist Skills (HEPSS) status is awarded by the Finance Centre Director, to those have specialist skills deemed necessary to promote and sustain economic activity in Gibraltar.

HEPPS is offered to executives and those in senior management positions, who have not been resident in Gibraltar during the previous 3 years and who earn more than £160,000 locally. Applicants are required to purchase or rent an approved HEPSS residential property for their own exclusive use.

Successful applicants benefit from an assessable income capped at £160,000 which results in an annual tax liability of £39,940 (2024-2025). Gibraltar does not levy capital gains tax, inheritance tax, gift tax and there is no tax on many types of investment income.



United Kingdom

Renown for having a stable democratic government and a respected system of law, the UK is attractive to foreign investors as an ideal location to establish a tax efficient business and place of residence.

Business Start Up and Investment Programmes

INNOVATOR FOUNDER VISA

The UK Innovator Founder Visa is available to entrepreneurs or businesspeople who intend to establish an innovative business in the UK. The proposed business must be innovative, viable and scalable and applicants must have generated or have significantly contributed to the business idea.

Proposed businesses must be supported by a business plan, which is required to be assessed and past an official endorsing body. Applicants must play a key role in the day-to-day management and development of the business, and whilst there is no stated minimum level of business investment requirement, applicants are required to show they are able to support their business, dependants and have good English language skills.

The Innovator Founder Visa is valid for 3 years, after which they are eligible to apply for Indefinite Leave to Remain (ILR). Successful applicants can bring their partner and children under the age of 18 to the UK. They can also apply for indefinite leave to remain after 5 years.

SKILLED WORKER VISA AND A SPONSOR LICENCE

A UK company with a 'Sponsor Licence' is entitled to employ non-UK staff, provided the role is considered by 'UK Visas and Immigration' to be 'skilled' and 'genuine'. The employee also needs to be earning a minimum salary of £38,700 pa and in some cases, more.

Provided the company has a genuine trading presence in the UK, is well established and well governed, it can apply for a 'Sponsor Licence'.

The owners of the company, as well as non-UK employees can qualify for the Skilled Worker Visa, which will be initially granted for a period of up to five years. They are however required to prove they are suitable for the role and have good English language skills.

After five years of continuous residence in UK, holders of the 'Skilled Worker Visa' may be eligible to apply for Indefinite Leave to Remain (ILR) or permanent residency. Twelve months after securing ILR, they may also qualify to naturalise as a British citizen.

GLOBAL TALENT VISA

This category is for applicants who can demonstrate a strong record of international success and acclaim as a global leader in one of the fields of academia & research, arts & culture or digital technology. Unless the applicant has won one of the nominated awards (i.e. an Academy Award, 'Oscar'), the application must be endorsed by a Home Office approved body (such as Tech Nation for digital technology or the British Fashion Council for fashion and design).

After 3 years, applicants can apply for Indefinite Leave to Remain (ILR), provided they have achieved a certain level of success in their chosen field within the UK.

Applicants who don't have a strong track record of international success but do show sufficient talent may be endorsed for a Global Promise Visa, which allows for ILR after 5 years, subject to demonstrating some fulfilment of their potential in the UK.

INDEFINITE LEAVE TO REMAIN (ILR) AND CITIZENSHIP

Indefinite leave to remain provides successful applicants the right to live, work and study in the UK permanently. Different qualifying terms and conditions apply depending upon an applicant's UK residency status.

Individuals can apply for UK citizenship once they have lived in the UK for 5 years and have held ILR for at least 12 months.

Tax Residency Programmes

NON-DOMICILED UK RESIDENT TAX STATUS

The UK tax code provides a preferential tax regime for those who are resident but not domiciled in the UK – often referred to as 'non-dom' status. Although considerable changes have been made to the rules in recent years, it remains a highly attractive regime for non-UK domiciled individuals coming to live in the UK.

A person who is resident but not domiciled in the UK can choose to be taxed under a special regime, the 'remittance basis' of taxation, which enables them to access the following tax benefits:

The remittance basis of taxation restricts the UK tax liability to UK-source income and gains. Non-UK source income and gains are not taxed in the UK, unless and until they are brought into (remitted) to the UK. Any non-UK income and gains that are retained outside the UK will not be taxed in the UK.

For the first six years of an individual's UK residency, there is no charge to claim the remittance basis of taxation but an annual charge, known as the 'Remittance Basis Charge' (RBC), is imposed for nondoms who have been resident in the UK for at least seven of the past nine years immediately preceding the relevant tax year. This is currently set at £30,000 per year. The RBC increases to £60,000 per year for non-doms who have been resident in the UK for at least 12 of the past 14 years.





United Arab Emirates (UAE)

A leading country for individuals and families seeking to establish a place of residence in the Middle East, the United Arab Emirates (UAE) provides a stable political and social environment, clear and transparent tax rules, good infrastructure, a favourable investment climate and an excellent quality of life.

Long-Term Residence (LTR) Visas

The UAE Long-Term Residence (LTR) or Golden Visa is a residence permit that enables foreign nationals to live, work or study in the UAE, while enjoying a wide range of benefits, which include a long-term, renewable residence visa valid for up to 10 years, with no requirement to have a local sponsor and no requirement to spend six months or more in the UAE.

Successful applicants can sponsor family members, including spouse and children regardless of their age, an unlimited number of domestic helpers and, should the primary holder of the Golden Visa die, family members can remain in the UAE until their permits expire.

Residency by Investment Visa

The Real Estate Investor Golden Visa is a five-year visa for investors who have invested or wish to invest in property in the UAE. To qualify applicants are required to meet the following criteria:

- · Own local real estate in which they have invested a minimum amount of AED 2 million.
- Applicants are required to maintain the investment for at least two years after the Golden Visa has been issued.

Business Start Up and Investment Programmes

Self-Sufficiency / Financially Independent Visas

INVESTORS IN PUBLIC INVESTMENTS

An investor is also able to qualify for the Golden Visa through public investments. To qualify investors must provide evidence that they have invested at least AED2 million in either of:

- A UAE-accredited financial deposit or qualifying investment fund.
- A UAE-based company.

Alternatively, applicants can provide proof that they have made a minimum annual tax payment of AED250,000 for two years prior to the application.

ENTREPRENEURS

Entrepreneurs may qualify for a five-year Golden Visa if they own an economic project of a technical nature or based on risk and innovation. They will also require an approval letter from each of the following:

- An auditor in the UAE stating that the project value is not less than AED500.000
- The authorities in the Emirate stating that the project is of a technical nature or based on risk and innovation.
- An accredited business incubator in the UAE to establish the proposed activity.

UAE RETIREMENT VISA

To qualify, retirees over the age of 55 or individuals who have worked for 15 years or more, inside or outside the UAE, are eligible to apply for a five-year Retirement Visa if they also make a financial deposit of a minimum AED1 million within the UAE and either:

- Own one or more real estate properties in the UAE valued at a minimum AED1 million.
 - or
- Have a fixed annual income that is no less than AED240,000 in Abu Dhabi or AED180,000 in Dubai (or its equivalent in foreign currencies)

UAE REMOTE / VIRTUAL WORK RESIDENCE VISA

Non-UAE nationals employed outside the UAE are eligible to apply for a Virtual Work Visa. This one-year visa allows foreigners to enter and live in the UAE under self-sponsorship. To qualify, applicants must provide evidence that:

- They work remotely for an organisation outside the UAE.
- Receive a monthly income of USD3,500 (or its equivalent in foreign currencies).

Alternative Long Term Residency Programmes

Tax Residency Programme

SPECIALIST TALENT VISA

Skilled professionals and executive directors employed in the UAE, who have a minimum bachelor's degree in the field of Science, Engineering, Health, Education, Business and Management, Information Technology, Law, Sociology and Culture, may be eligible to apply for a Specialist Talent Visa.

EXCEPTIONAL TALENT VISA

Medical professionals and scientists, inventors, creative people in the fields of culture and art, athletes, specialists in engineering and science, may also qualify Exceptional Talent Visa.

OUTSTANDING STUDENTS AND GRADUATES

Students and graduates who have achieved outstanding results in high school, universities in and outside the UAE may qualify for an Outstanding Student and Graduate Visa.

ESTABLISHING TAX RESIDENCY IN THE UAE

The UAE does not apply personal income tax and, until recently, there was no domestic legislative definition of personal tax residence. As of 31 March 2023, however, individuals will be deemed to be tax resident in the UAE if:

- The individual's usual or principal place of residence is in the UAE and the centre of their financial and personal interests is in the UAE, or other conditions prescribed by the Minister, or
- The individual has been physically present in the UAE for a period of 183 days or more in a 12-month period, or
- The individual has been physically present in the UAE for a period of 90 days or more over a 12-month period and is a UAE citizen, UAE resident or GCC national who either has a permanent place of residence in the UAE or carries out a job or business in the UAE.



Business Start Up and Investment Programmes

ESTABLISHING A COMPANY AND RESIDENCY IN THE MIDDLE EAST?

There are numerous options through which a foreign investor can establish a business and residency in the Middle East. Subtle differences to local rules and regulations apply.

Utilising our local teams experience and expertise of company registration in the Middle East, the Sovereign Group will help you determine the best fit for you. We have a strong physical presence in the region with offices based in Abu Dhabi, Bahrain, Dubai, Oman, Qatar and Saudi Arabia.

While the UAE has played a pivotal role in driving the residency programmes offerings for the region, most GCC countries have Golden Visa regimes or long-term visa options of their own.

Bahrain

Bahrain Golden Visa can be obtained through many of the same avenues as the UAE Golden Visa. Investments into real estate of BHD 200,000, retirees with a monthly income of BHD 4,000, expats with a 5-years working history in Bahrain who earn a minimum of BHD 2,000 and skilled individuals for contributions to their professional fields. Many of the unique benefits include easy bank account opening, family residency inclusion and no minimum stay requirements.

Oman

The Oman Golden Visa is a 5-to-10-year visa independent of employment status which can be obtained through real estate, business, or capital investments. The 5-year 'Silver Visa' requires OMR 250,000 in government bonds, real estate or business investments. Retirees can explore the Silver Visa provided they are over the age of 60 years with 2-years of employment in Oman and a monthly income of OMR 4,000. The Oman 10-year 'Golden Visa' is available to investors with a minimum OMR 500,000 into real estate or business investments (Omanibased LLC, closed joint-stock company, or government bonds) or setting up a company with a minimum of 50 Omani national employees (no minimum investment required).

Qatar

Qatar's real estate investor visa can be accessed in one of two ways. Category 2 is a 5-year renewable property investment of a minimum of USD200,000 in which the applicant can live and work in Qatar without a sponsor. Category 1 requires a higher minimum investment of USD 1,000,000 in a single or collective properties. This higher investment allows the visa holder Permanent Residency (PR) and can benefit from privileges such as public healthcare, education and select commercial investment opportunities.

Saudi Arabia

Saudi Arabia Premium Residency Permit (PRP) can be obtained through many of the similar avenues of other Golden Visa regimes across the region. High-earning skilled professionals, Investment (SAR7 million) into businesses that promote economic diversification, entrepreneurs with MISA accredited investment of minimum SAR400,000, specialised talents in sport, arts or culture and real estate investments totalling SAR4,000,000. Targeted to high-net-worth individuals, the Saudi PRP requires one-off fees based on duration of stay. Limited duration residency is valid for 5 years and is renewable yearly for a fee of SAR100,000.

Permanent Residency is a one-time fee of SAR800,000 without the need for renewal.

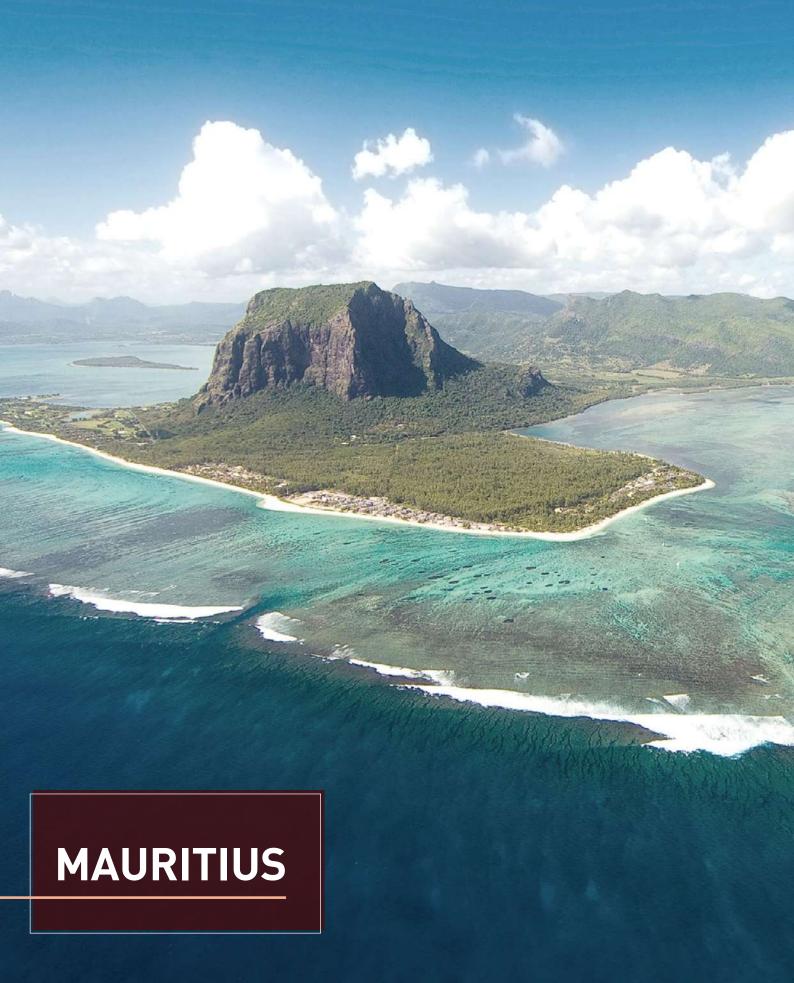
The UAE, Oman, Qatar, and Bahrain all offer Investor/ Partner visas which operate similarly to the traditional employment visa but through company setup the applicant can obtain a 2-year renewable visa for their business investment.

Sovereign provides a complete range of company formation and residency solutions to help entrepreneurs turn business ideas into full-fledged companies. In addition to helping with the setup and incorporation process, our team also assist in processing the necessary documentation for your dependant's residency permits. We also facilitate and manage the employment visa process for your employees, taking the stress away from you and ensuring a swift and efficient transition for the team.

The Middle East provides a range of company set up options to suit all requirements, including a:

- Branch Office
- · Trade Representative Office
- · Professional Service Licence
- Free zones





The Republic of Mauritius

Often referred to as the 'Jewel of the Indian Ocean', the Republic of Mauritius is a small group of islands about 800 km east of Madagascar. Almost entirely surrounded by coral reefs and with a maritime subtropical climate, Mauritius has become a popular tourist destination and a highly sought-after location for foreign investors seeking a platform between Africa, Asia and the rest of the world.

Mauritius has a mixed developing economy based on manufacturing, agriculture, tourism, financial services, with ICT also growing in importance. Gross domestic product is now among the highest in Africa and Mauritius is ranked first in Africa and 13th worldwide in the 2020 World Bank Ease of Doing Business Report 2020.

Mauritius has attracted a wide range of settlers, who have brought their own cultural influences and have made Mauritius a vibrant and inclusive country. English and French are considered the official languages but Creole, a French-based patois, is the lingua franca. Mauritians are commonly multilingual.

Most of the population is concentrated on the main island of Mauritius, which hosts Port Louis, the capital and largest city. Mauritius has a good transport infrastructure. The road system is well developed and there are direct flights to Mauritius from 26 cities in 19 countries.

Offering political and social stability, a low-cost standard of living, a business-friendly environment and tax efficiency for both individuals and businesses, Mauritius is an ideal location for those looking to establish a new or alternative country of residency in which to live, work or retire.

Residency by Investment Programmes

Financially Independent Visa

RESIDENCY BY PROPERTY ACQUISITION

The Residency by Property Acquisition provides a 20-year permanent residency permit to invest who invest at least US\$375,000 in one of the following real estate investment categories:

- Integrated Resort Scheme (IRS): Qualifying projects larger than 10 hectares
- Real Estate Scheme (RES): Qualifying projects smaller than 10 hectares on freehold land
- Property Development Scheme (PDS): Social and ecological impact-focused projects
- Smart City Scheme (SCS): Multipurpose eco-communities
- Invest Hotel Scheme (IHS): New or existing hotel units
- Ground + 2 Apartment Scheme (G+2): Condominium developments at least two floors above ground

A residency by property acquisition permit is permanent and valid for 20 years, after which it is renewable provided the investment is upheld.

RETIRED NON-CITIZEN RESIDENCE PERMIT

The Retired Non-Citizen Residence programme provides a 10-year Residency Permit to applicants who are at least 50 years and can demonstrate they are financially secure and able to transfer USD1,500 per month, or a total of USD 18,000 per annum go Mauritius.

Holders are eligible to renew the permit upon expiry, subject to providing evidence that they have met the minimum income transfer requirements during each of the previous 10 years.

Retirees are also eligible to apply for a 20-year Permanent Residence Permit if they have either held residency for at least three years, or if they invest a minimum of USD200,000 in the acquisition of a property qualifying under the Property Development Scheme for Senior Living.



Business Start Up and Investment Programmes

INVESTMENT IN A QUALIFYING BUSINESS ACTIVITY: 20-YEAR PERMANENT RESIDENCE PERMIT (PRP)

Mauritius offers three categories of Occupation Permit to individuals who do not have USD375,000 to invest. Occupation Permits apply for three to 10 years and, significantly, are also capable of being converted into a 20-year Permanent Residency Permit (PRP) after just three years if holders satisfy the relevant criteria.

Dependants of primary holders can apply for a residence permit for a duration not exceeding that of the holder but require an Occupation or Work Permit to work in Mauritius.

Investor: A shareholder and director in a company incorporated in Mauritius under the Companies Act 2001, an Investor is eligible to apply for an investor Occupation Permit under the following options:

- **Standard (10-year residency permit)** For individuals who invest USD50,000 into a new Mauritius-based business.
- **Net Asset Value (10-year residency permit)** For individuals who own or inherit an existing Mauritius business, with a net asset value of at least USD50,000 and a cumulative turnover of at least MUR12 million (c. USD260,000) during the three years preceding an application.
- **High Tech Machine & Equipment** An initial investment of USD50,000, or its equivalent, comprising a minimum amount of USD25,000 transferred to the bank account of the applicant company and the equivalent of the remaining value in high tech machines and equipment.
- **Innovative Start-Ups** An unspecified amount into an innovative project, with at least a 20% R&D component, that is approved by the Economic Development Board

Holders of an Occupation Permit as Investor are eligible to renew the permit after 10 years, provided the company has achieved a minimum annual gross income of at least MUR4 million annually as of the third year of registration.

They are also eligible to apply for a 20-year PRP after three years, provided the company has achieved either a minimum annual gross income of MUR15 million for the three years preceding the application, or an aggregate turnover of MUR45 million for any consecutive period of three years during the current permit.

Professional: Foreign professionals employed in Mauritius under a contract of employment and earning a minimum basic monthly salary of MUR60,000 (c. USD1,300), reduced to MUR30,000 for professionals in the information and communication technologies (ICT), business process outsourcing (BPO), pharmaceutical manufacturing and food processing sectors.

Holders are also eligible to apply for a 20-year PRP after three years, providing they have received a basic monthly salary of at least MUR150,000 for the preceding three consecutive years.

Self-Employed: A non-citizen engaged in a professional business activity on their own account who makes an initial transfer of USD35,000, or its equivalent, to a bank account in Mauritius and provides two letters of intent from potential local or international clients.

Holders of an Occupation Permit as Self-Employed are eligible to renew the permit after 10 years, subject to a minimum annual business income of MUR800,000 from the third year of registration.

Holders are also eligible to apply for a 20-year PRP after three years, providing they have achieved an annual business income of at least MUR3 million for the preceding three consecutive years.







Citizenship Programmes

The Sovereign Group offers a provides a range of citizenship solutions which can be categorised as follow:

Indirect Citizenship Programmes offer citizenship in exchange for government donations following a one or three-year period of legal residency. Sovereign Services Limited Malta is a licenced agent of the Community Malta Agency (Licence number AKM- SOV- 22) and authorised to assist clients successfully prepare and process citizenship in Malta after a period of either of 12 or 36 months.

Direct Citizenship Programmes offer citizenship within three to six months in exchange for an investment or government donation, generally with no physical presence requirements. They also provide residency rights within a range of other countries with which the issuing country holds freedom of movement treaties. Sovereign and our licensed partners assist clients successfully prepare and process such programmes in Antigua & Barbuda, Dominica, Grenada, St. Kitts & Nevis, St. Lucia.

Citizenship through Naturalisation refers to the legal process by which a noncitizen may qualify to acquire citizenship of that country after a certain amount of time holding legal residency status. The rules of naturalisation vary from country to country but typically include a promise to obey and uphold that country's laws and may include additional requirements, such as having proved an adequate knowledge of the national language and culture.

Indirect Citizenship Programmes

THE MALTESE EXCEPTIONAL INVESTOR NATURALISATION (MEIN) PROGRAMME

The Maltese Exceptional Investor Naturalisation (MEIN) Programme is a 'Citizenship by Investment programme that aims to attract the highest quality of investor from all over the world and requires the main applicant to make qualifying investments donations in Malta.

Open to non-EU nationals except those from certain sanctioned countries. An applicant and all adult dependants must have held Maltese residency status for a minimum of 36 months or, under an 'expedited procedure' option, for a minimum of 12 months.

The MEIN programme grants citizenship for 'exceptional services' to individuals and their families who make a direct investment in Malta that contributes to its social and economic development. Successful MEIN applicants gain the right to live, work or study in Malta, or any other EU member state by extension, as citizens of Malta.

Each application is subject to a stringent due diligence process, including thorough background checks. Community Malta Agency (CMA) is the Maltese government body responsible for administering the regulations.

SOVEREIGN SERVICES LIMITED MALTA A CMA LICENSED ENTITY

A licensed agent of the Community Malta Agency (license number AKM-SOVE), Sovereign Services Limited Malta is best placed to advise, and support applicants who wish to establish citizenship in Malta.

THE BENEFITS

The MEIN programme is available to married couples, unmarried couples in a long-term relationship, their children under the age of 18, dependant unmarried children under the age of 29 and dependant parents on either side of the family. Successful applicants benefit from:

- Maltese Citizenship for life which may be passed on to future generations.
- The right to reside, settle and stay indefinitely in Malta.
- Visa-free or visa on arrival access to 186 countries including the USA & Canada
- Malta is a full member of the EU, its citizens are entitled to live and work anywhere in Europe.
- Excellent education and healthcare systems
- The option to maintain dual citizenship
- Multiple personal and corporate tax benefits

QUALIFICATION REQUIREMENTS

To qualify for the MEIN programme, applicants must provide evidence that they have met the following qualification requirements:

- Hold legal residence in Malta for either 12 or 36 months.
- Make a non-refundable exceptional direct investment of either €750,000 or €600,000, depending upon the residence period selected, 12 or 36 months respectively.
- An additional exceptional direct investment of €50,000 for each of their dependants.
- Purchase a residential property in Malta with a minimum value of €700,000. *
 or
- Lease a residential property in Malta for a minimum annual rent of €16,000.*
- Donate €10,000 to a registered philanthropic, cultural, sport, scientific, animal welfare, or artistic nongovernmental organization.
- Demonstrate that they do not have a criminal record or pose a potential threat to the national security, public policy, public health or public interest of Malta.
- Pass all due diligence and background verification checks.
- Have worldwide medical insurance cover.

^{*} Property is required to be adequate to accommodate the main applicant and their dependants and must be held for a minimum period of five (5) years.



Direct Citizenship Programmes

CARIBBEAN CITIZENSHIP BY INVESTMENT PROGRAMMES

Caribbean Citizenship by Investment (CBI) Programmes are highly sought after by those who wish to secure an alternative passport, to expand their citizenship rights, estate planning options, their ability to travel worldwide, whether that be for personal or business reasons and/or, as an insurance policy in case the situation in their home jurisdiction takes a turn for the worse.

Caribbean CBI programmes provide successful applicants with the option to live and work in their chosen country, tax efficiency, freedom of movement within member states of The Caribbean Community (CARICOM) and visa free or visa upon arrival access to a up to 155 countries around the world.

The Sovereign Group is partnered with highly experienced, government authorised legal and application processing partners with offices in the Caribbean and the Middle East. Together we provide full guidance and assistance with the preparation and processing of CBI applications in the following Caribbean countries:

- Antigua & Barbuda
- Dominica
- Grenada
- Saint Lucia
- Saint Kitts and Nevis

CARIBBEAN CBI PROGRAMME BENEFITS

Caribbean CBI programmes provide investors and their dependents with a broad range of benefits, which include, but are not limited to, the following:

- Grant of citizenship, typically within three to six months
- Minimum qualifying investment of USD200,000*
- Multiple investment options government donation, bonds or real estate
- Option to include dependent family members under a single investment
- Visa-free travel or visa-upon-arrival access to up to 155 countries worldwide
- No minimum stay/residency requirements
- Protection of business and/or personal assets
- No income tax
- No inheritance, estate, or wealth taxes

^{*} Each programme operates with its own minimum investment requirements and options. Additional Government application, legal and processing fees also apply.





Alternative Residency and Citizenship Programme Options

The Sovereign Groups global network of professional service partners enables us to assist clients with the development and implementation of alternate or second residency and citizenship strategies in the following additional countries:

UNITED STATES OF AMERICA

• EB-5 Immigrant Investor Programme

PORTUGAL

• Highly Qualified Activity (HQA) Visa Programme

GREECE

- · Golden Visa
- Financially Independent Persons (FIP) Residency Permits
- · Digital Nomad Visa
- Non-Dom Tax Regime for Investors
- Non-Dom Tax Regime for Retirees

ITALY

- Investor Visa
- · Elective Residency Visa
- Self-employment Visa
- · Representative Office Visa
- Three Tax Programmes Flat Tax, Lavoratori Impatriati and Lump Sum Tax

SPAIN

- Golden Visa
- Non-Lucrative Visa
- Special Regime for Displaced Workers (The Beckham Law)

Sovereign Group Residency and Citizenship Planning Services

The process of obtaining citizenship or residency consists of a series of important steps that need to be implemented carefully and at the right time. Sovereign has a wealth of international and local expertise and a high success rate of delivering grants of residency or citizenship within a minimum time frame.

Sovereign will assist clients to identify the most suitable programme to match their individual circumstances and requirements and will advise on the most effective way to meet the investment criteria. Sovereign will then manage each step of an application and structuring of the investment to ensure that all submissions are executed correctly and at the right time.

Through our global office network, Sovereign can provide clients with a seamless service in both their current location, as well as in the target country for residence or citizenship. Each country has a different set of requirements that applicants must fulfil but the following requirements are common to all such programmes:

- Applicants are required to have a clean criminal record
- Applicants are required to show the legal source of their income and/or investment funds
- Applicants are required to clearly demonstrate that they meet their chosen programmes qualifying requirements

Sovereign only works with investors who have passed its internal due diligence checks, which are similar to those used by the government authorities. Police clearance records from authorities in the applicant's country of origin and in country/countries where the applicant has resided must be provided at the preliminary stage.

Applications will have to be submitted in the correct language and any documents in another language will need to be accompanied by an authenticated translation. All documents must be submitted in original or be officially certified. Certifications should be authenticated by an apostille or validated by the appropriate government department.

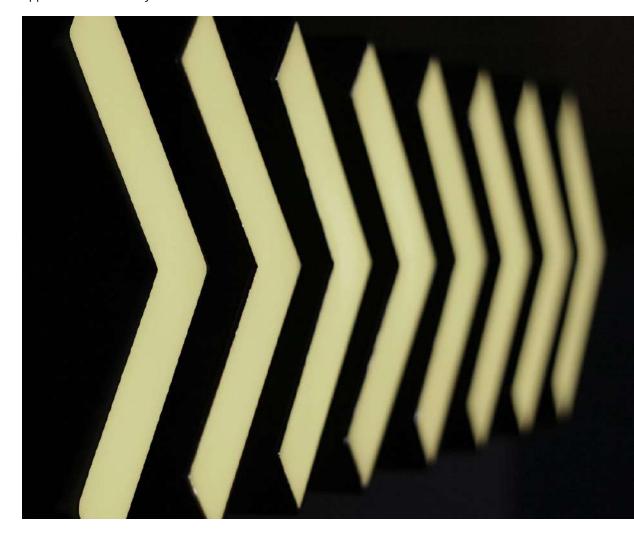
Sovereign or its professional partners will assist with identifying the best available options for investment, provide a legal overview of purchase agreements, relevant documents or both, and advise on any tax implications. We will also run a pre-clearance check with the responsible authorities and, where necessary, assist with the incorporation of holding company structures.

Sovereign's CBI and RBI Services

In respect of application submissions, Sovereign will:

- Assist with the preparation of all required documents
- Check the citizenship/residency application packs to ensure they are complete and up to standard
- Monitor the status of the applications and provide continuous follow-up.

Once residency or citizenship is granted, Sovereign or its professional partners will assist with the process of obtaining the passport, residency or identity card for the main applicant and all family members.



Whatever Your Needs - Choose Sovereign

The Sovereign Group has been involved with the set up and administration of an estimated 30,000 structures worldwide since 1987. We now employ, directly, well in excess of 400 trained and experienced staff throughout the world, and there are many more staff working in our joint ventures and managed operations.

We have established a compelling, specialist offering in the provision of private client services that few of even the largest international legal or accountancy firms can match. The depth and breadth of this offering means we have built up a huge reserve of in-house knowledge, expertise and experience. There is very little that we haven't seen before and there are few areas where we cannot be of help.

This brochure sets out Sovereign's core specialisations but there is much more we can do to help and we would be delighted to do so. If we can't assist our clients with an aspect of their personal or business affairs, we will almost certainly know someone who can. So whatever your need, just ask and we will do our best.





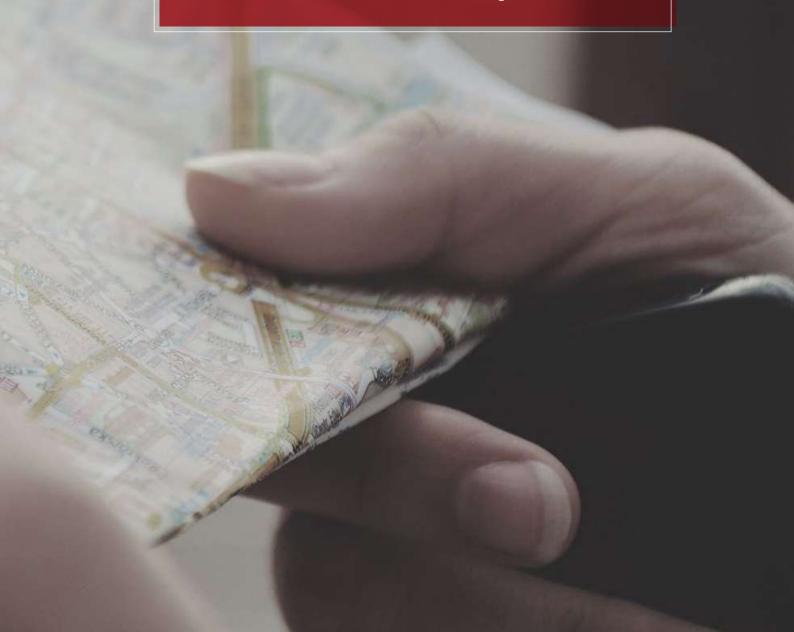
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