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EDITORIAL

This issue opens with an article by Robert Argles of 15 Old Square. He responds to a comment in the discussion in the previous issue by the consulting editor, Robert Venables QC. That earlier article discussed the provisions in the capital gains tax legislation imposing a charge on settlors in respect of gains realised by trustees of settlor-interested trusts and the effect on them of the Finance (No. 2) Act 2005 legislation designed to prevent the ‘round the world’ schemes. In Robert Argles’s response, he considers whether the capital gains tax remittance basis is available to non-domiciled settlors of UK-resident trusts.

The second article, by Professor Paolo Panico, considers the taxation consequences of the recent ratification by Luxembourg of the 1985 Hague Trusts Convention.

The third article is Gayane Babayan. She analyses the practical advantages to companies of setting up their international headquarters in the United Kingdom.

Finally, Carol Gaw sets out the basics of Hong Kong taxation and the advantages of using Hong Kong as a base when making investments in mainland China.

Robert Venables Q.C.

Keith Gordon

December 2005