

Comparison Chart



01/2024

	BVI	Cayman Islands	Hong Kong	Singapore	United Kingdom	Bermuda	Marshall Islands
Basic information							
Political stability	Stable	Stable	Stable	Stable	Stable	Stable	Stable
Legal system (base)	English	English	English	English	English	English	USA
Type of company	Ltd^	Exempt^	Ltd^	Pte Ltd^	Pte Ltd	Ltd^	Corporation
Official currency	USD	CI Dollar	HK Dollar	SG Dollar	GBP	Bermuda Dollar	USD
Migration of domicile permitted	Yes	Yes	No	Inward only	Yes	Yes	Yes
Tax by jurisdiction on offshore profits	Nil	Nil	Nil	Nil	Nil	Nil	Nil
HKEX listing permitted	Yes	Yes	Yes	Yes	England and Wales	Yes	No
Corporate requirements							
Minimum number of shareholders	1	1	1	1	1	1	1
Minimum number of directors	1	1	1 ▽	1	1	1	1
Corporate directors permitted	Yes	Yes	Yes ▽	No	Yes	Yes	Yes
Secretary required	No	No	Yes	Yes	No	Yes	Yes
Standard authorised capital / shares	50,000 shares	USD50,000	N/A	N/A	N/A	USD50,000	500 shares or USD50,000
Bearer shares permitted	No*	No*	No	No	No	No	Yes
Local requirements							
Registered office / Registered agent	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Company secretary	No	No	Yes	Yes	No	Yes	No
Local directors	No	No	No	Yes	No	No	No
Local meetings	No	No	No	No	No	No	No
Due diligence / Disclosure							
Due diligence required	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Disclosure of Beneficial Owner on public file #	No	No	No	No	No	No	No
Beneficial Owner / Controller Register established	Yes	Yes	Yes	Yes	Yes	Yes	No
CRS participant (from 1 January --)	2017	2017	2018	2018	2017	2017	2018
Government filing of Register of Directors	Yes	Yes	Yes	Yes	Yes	Yes	No
Government filing of Register of Shareholders	Optional	No	Yes	Yes	Yes	No ☐	No
Annual requirements							
Annual return	Yes	Yes	Yes	Yes	Yes	No	No
Audited accounts	No	No	Yes	Yes	No	No	No
Economic Substance compliance	Yes	Yes	No	No	No	Yes	Yes
Chinese language features							
Chinese name permitted on Certificate of Incorporation	Yes	Yes	Yes	No	No	No	Yes
Chinese M&A available	Yes	No	Yes	No	No	No	Yes
Days to incorporate companies on request (approx.) +							
English name	2	3	5-6	3	3	6	2
English & Chinese name	2	7-9	5-6	-	-	-	1

Notes:

^ Other vehicles such as SPCs, LPs available # Note that most jurisdictions have financial reporting authorities which can obtain information under circumstances particular to financial crime or other illicit activities.

▽ At least one director must be an individual ☐ But available for inspection by the public.

* unless specifically pre-authorised and maintained by a licensed custodian + Indicates business days to incorporate, provision of company documents from registry varies.

- This Comparison Chart is intended to provide an overview of key corporate features of the various jurisdictions and assumes the company is not an investment fund. The content is general in scope and should not be relied upon as advice.

- Marbury strongly recommends that applicable professional advice be taken prior to purchasing a company or establishing any corporate structure.

- Every effort has been made to ensure that the content within this Comparison Chart is correct and up-to-date. Marbury does not accept any responsibility, legal or otherwise, resulting from any errors or omission.

Please contact your usual Marbury advisor or info@marburys.com for further information.