



## Investment Opportunities Through Seychelles Structures

### Investment Opportunities in Seychelles

The Seychelles Government has created a proactive environment to enable successful development of the financial sector in Seychelles. In particular, focus has been placed on the International Business Company (“IBC”) and the Company with Special Licence (“CSL”).

In order to help our clients navigate through these important developments, Appleby has created two new guides dealing with the Seychelles IBC and CSL.

### The International Business Company (the “IBC”)

The IBC is a tax exempt company provided it does not conduct business from or within the Seychelles. Typically, the IBC is incorporated as a private company limited by shares. The registration process is straightforward with incorporation within 24 hours. The most notable features of the IBC are the non-disclosure of the shareholder, directors or officers and there is no paid up capital requirement. In addition, the company name can be registered in any language and bearer shares are allowed. In addition, dual language is accepted on the Memorandum and Articles of Association and on the Certificate of Incorporation. IBCs are an efficient tool in wealth structuring, estate planning and asset protection.

The IBC is cost-effective as it requires only one director and one shareholder, whereby corporate bodies can occupy either or both roles. Local residents may act as director or shareholder, including in a nominee capacity. Meetings of an IBC can be held anywhere. The company may maintain a bank account in Seychelles and there is no requirement to file or prepare audited accounts.

To View Appleby’s brief to The Seychelles International Business Company, please [click here](#).

## The Company with Special Licence (the “CSL”)

The CSL is a domestic company incorporated under the Companies Ordinance, 1972 and is issued a special licence under the Companies (Special Licence) Act, 2003 (the “CSL Act”). The CSL is tax resident in the Seychelles and the incorporation and licensing timeframe is approximately 2 to 3 weeks. A CSL may carry on business from within or outside Seychelles. There are strict provisions in the CSL Act providing that all information relating to shareholding and beneficial ownership of the CSL remain confidential. The CSL is liable for Seychelles business tax at a rate of 1.5% of its world-wide income. However, it is exempt from Seychelles withholding tax on dividends, interests and royalties and from Seychelles stamp duty on shares and properties. The CSL is required to appoint a Seychelles-resident secretary which is a licensed CSP and have a minimum of two directors and two shareholders. A CSL is also required to prepare and file annual audited accounts and hold AGMs.

One of the most attractive features of the CSL is its accessibility to the expanding double tax avoidance agreements that Seychelles has with various jurisdictions notably China and Indonesia. To access the benefits of the DTA the CSL must demonstrate effective management and control from the Seychelles. A CSL has multiple uses, including a holding company, an investment company, a holding intellectual company, a headquarters company or as a franchise company.

To view Appleby’s Brief entitled Moving Beyond with Efficient Low Tax Structures, Seychelles CSLs (Company Special Licence), please [click here](#).

## Conclusion

Seychelles continues to grow and evolve as an offshore financial centre providing a unique platform for investment into significant global areas. The IBC and CSL structures provide unique investment opportunities for the international business client and Seychelles has successfully managed to effectively balance sound legislation with a solid regulatory environment.

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