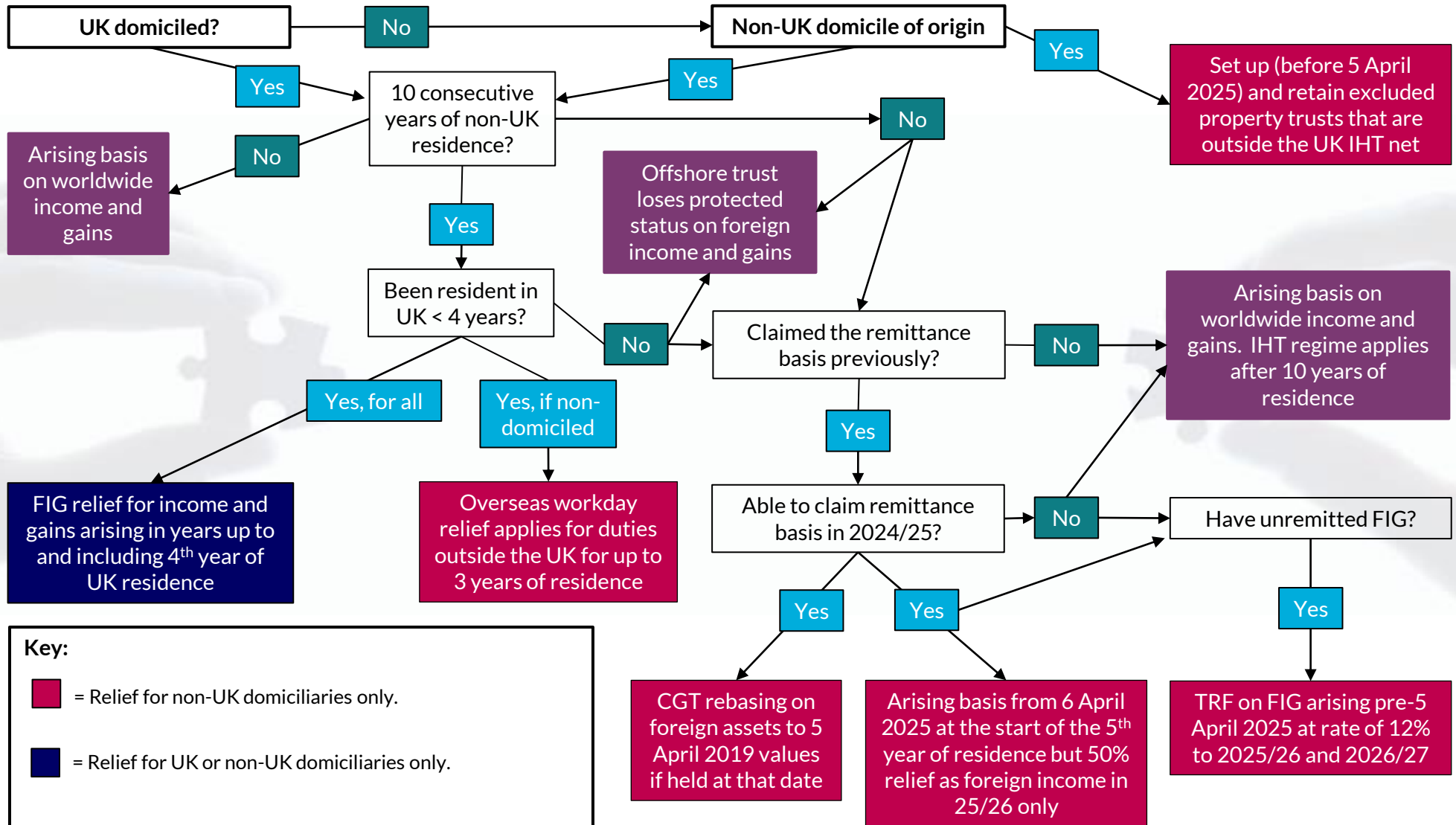


Changes to the tax regime for non-domiciled individuals

Conservative policies - announced - to apply from 6 April 2025

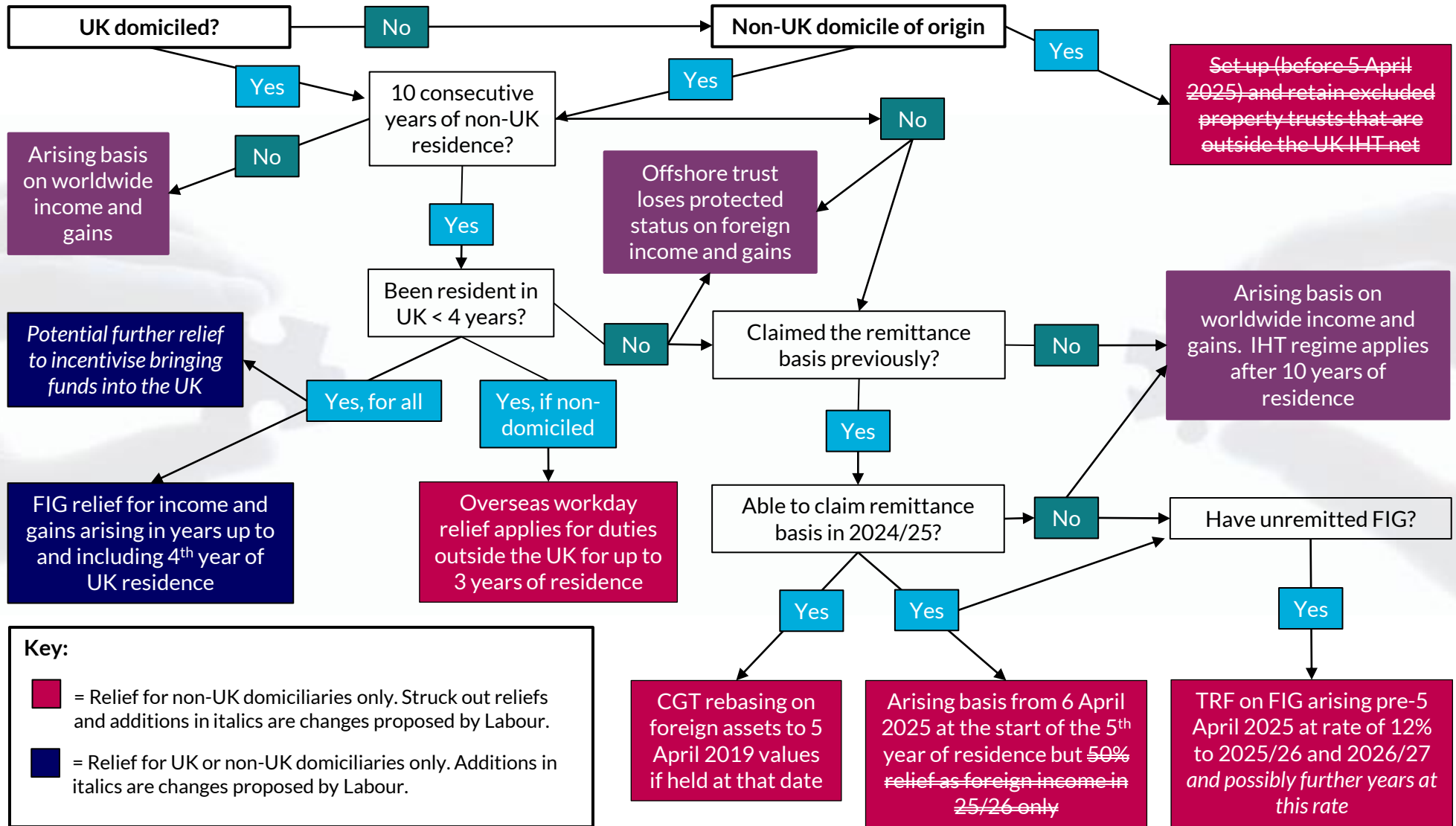


Key:

- = Relief for non-UK domiciliaries only.
- = Relief for UK or non-UK domiciliaries only.

Changes to the tax regime for non-domiciled individuals

Labour policies – expected to be announced - to apply from 6 April 2025



Changes to the tax regime for non-domiciled individuals

Notes to flowcharts

- **FIG** - Foreign income and gains
- **FIG Relief** - Can bring into the UK their foreign income and gains in the four-year period and not be taxed
- **TRF** - Temporary Repatriation Facility – ability to bring in foreign income and gains for two years (possibly more with Labour) at a reduced rate of tax of 12%
- Unremitted FIG – Foreign income and gains that have previously arisen at a time when the remittance basis was claimed and have not been brought into the UK so remain untaxed
- 10 consecutive years of non-UK residence – based on Statutory Residence Test and expected only to include complete years (not split years)
- Remittance basis claimed for TRF – can be in first 7 years when no charge, or in years when a charge to be taxed on that basis arose. It is unclear whether this will include those that are now deemed domiciled.
- Able to claim remittance basis in 2024/25 means this will not apply to deemed domiciled individuals
- 50% relief in 2025/26 on foreign income arising in that year is expected to be scrapped by Labour