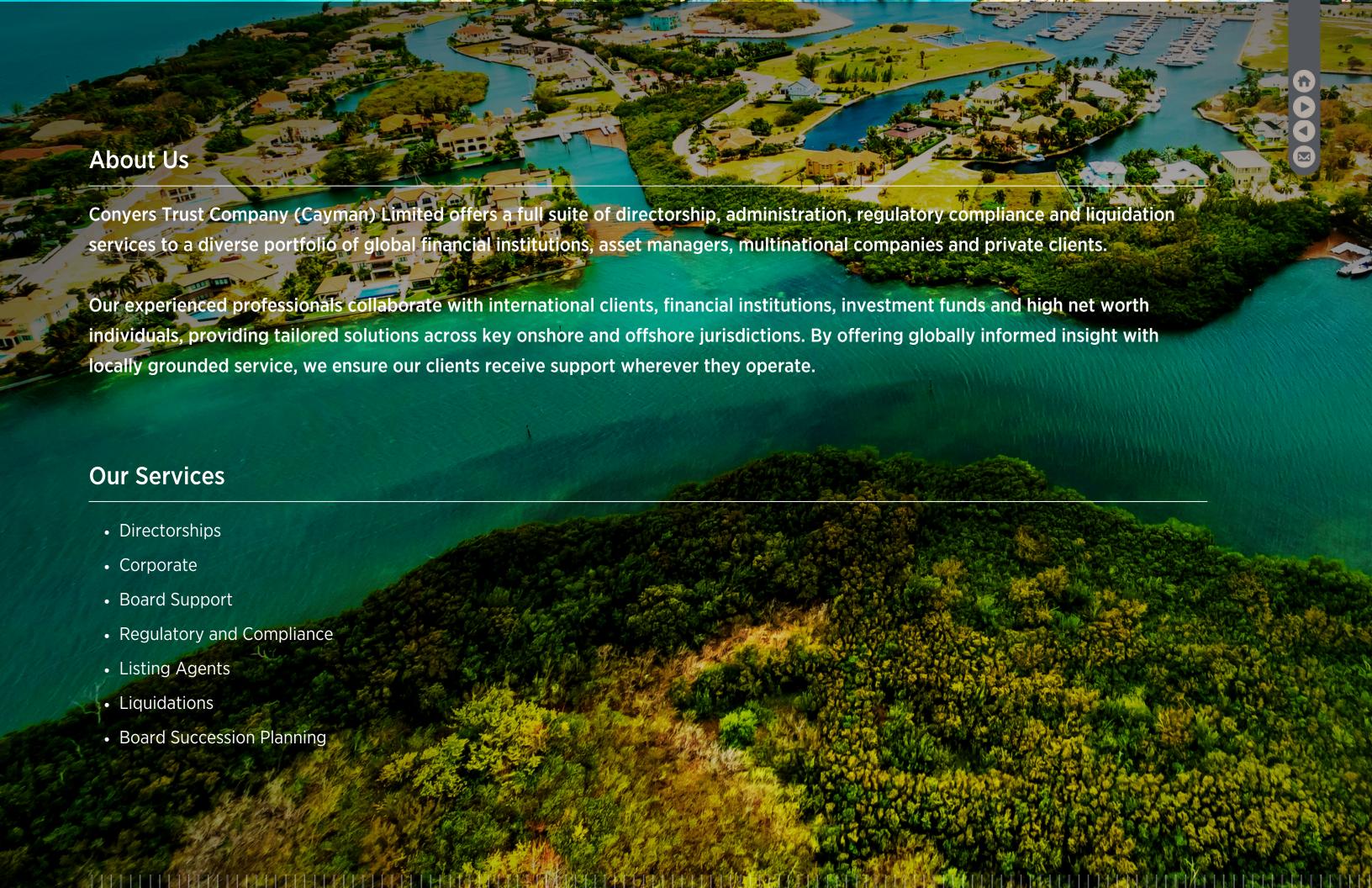
Department for International Tax Cooperation Portal Services CONYERS



Understanding Economic Substance: A Foundational Overview

The International Tax Co-Operation (Economic Substance) Act (2024 Revision) (the "ES Act")

The ES Act requires that all Cayman Islands entities notify the Cayman Islands Tax Information Authority (the "TIA") of, amongst other things, whether or not they are carrying on a "Relevant Activity" (as defined in the ES Act) and, if so, whether or not they are a "Relevant Entity". The notification to the TIA by companies, partnerships, exempted limited partnerships and foreign limited partnerships is by way of an annual Economic Substance Notification (ESN) which must be filed prior to an entity filing its annual Economic Substance Return (ESR) with the General Registry's Corporate Administration Portal (CAP).

All relevant entities must subsequently file an ESR form with the DITC within the 12 months following their financial year-end. An entity that is not a relevant entity due to being a tax resident outside the Cayman Islands must file an Entity tax resident in another jurisdiction Tax Resident Overseas (TRO) form. An "relevant entity" which does not conduct "relevant activity" is not required to submit an economic substance report. A "relevant entity" which receives no "relevant income" is not required to maintain economic substance.

DITC Portal Services

DITC Portal Services include the following:

Providing Secondary User services includes supplying the name and contact information of an employee or agent of Conyers located within the Cayman Islands to be reported on behalf of the Company.

Filing any required ESR or TRO (as applicable) on behalf of the Company within the DITC Portal.

If you require further information about the DITC Portal Service or need assistance with meeting your economic substance obligations, please contact our team at CaymanEconomicSubstanceReporting@conyers.com

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