

**Marathon Corporate Services Limited**  
**邁庫企業服務有限公司**  
**Tailored Trust Solutions**  
**量身定制的信托解决方案**  
**Business Trusts**  
**自有品牌信托**

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# Custom Tailored Business Trusts

## The Tailor is In..

We will develop a Business Trust Program that fits...  
Precisely tailored for you

## 裁缝在.....

我们将开发适合...的商业信托计划  
为您量身定制

Business Trusts are designed to cater to a huge range of issuer needs. Whether you are working with Intellectual property, Blockchain, Real Estate (either holdings or development), or traditional investments; A trust may provide you with an optimized structure. Accessing opportunities in new markets or looking for strategies to deal with various requirements are restricting your progress. Using the permissions and available exemptions, Business Trusts facilitate issuers' access to new markets, potentially streamlining the issuers' authorization and compliance requirements. Marathon Corporate Services Limited's solutions enable issuers to have a customized Hong Kong Trust as a legal vehicle for their existing or new investment products. Trusts may be vested or non-vested which may affect the report-ability of assets in trust and the timing of income reporting. Trusts may be configured to allow Tax-advantaged participation through Hong Kong Occupational Retirement Schemes (ORS) providing the maximum on flexibility in dealing with privacy issues under common reporting standards. Trust holdings can range anywhere from real estate developments and acquisitions to Cryptocurrencies, Forex, equities, mutual funds and commodities.

商业信托旨在满足大量发行人的需求。无论您是从事知识产权、区块链、房地产（控股或开发）还是传统投资；信托可以为您提供优化的结构。在新市场中获得机会或寻找战略来应对各种需求正在限制您的进步。通过使用权限和可用的豁免，商业信托可以帮助发行人进入新市场，从而有可能简化发行人的授权和合规要求。迈库企业服务有限公司的解决方案使发行人可以拥有定制的香港信托，作为其现有或新投资产品的合法工具。信托可能是既定的或未归属的，这可能会影响信托资产的报告能力和收益报告的时间。可以配置信托以允许通过香港职业退休计划（ORS）享受税收优惠，从而在通用报告标准下最大程度地灵活处理隐私问题。信托资产的范围很广，从房地产开发和收购到加密货币、外汇、股票、共同基金和大宗商品。

## Definition *Vested Trust*

***A Vested Trust is one where the assets are vested to specific beneficiaries, these Beneficial Owners enjoy a more direct connection to their assets, but as a result must declare the trust assets as beneficially owned which means they are reportable under New International Common Reporting Standards (CRS)***

***A Non-Vested Trust holds assets in common for a specified group of non-vested or potential beneficiaries, any of whom may be designated as a beneficiary at the discretion of the Trustee.***

***A member of a Non Vested trust is not considered a beneficial owner and there is no reporting requirement except for benefits designated by the Trustee. As legal title or beneficial ownership are not in the members hands there is no "ownership" to report on.***

## 定义一个既定的信任

一个既定信托是指资产归属于特定受益人的信托。这些受益所有者享有与其资产更直接的联系，但因此必须将信托资产声明为实益拥有，这意味着它们可根据新的国际通用报告标准进行报告。

非独资信托持有指定的非归属或潜在受益人群体的共同资产，其中任何人可由受托人酌情指定为受益人。

非受托信托的成员不被视为受益所有人，除受托人指定的福利外，没有任何报告要求。由于合法所有权和受益所有权不在会员手中，因此无需报告所有权。

# 开始你的旅程

## 启动步骤 First Steps

Its all in the planning...

### Explore

A meeting with your Trust Advisor will help you to tailor your Trust to meet your business, regulatory and compliance needs. Identifying opportunities and costs.

### 一切都在规划中

#### 探索

与您的信托顾问会面，能帮助您量身定制您的信托，以满足您的业务、法规和合规需求，物色机会和成本。

### Build your Trust

Working with your advisor, select which tools and methods fit your needs.

Your Trust may be vested or non vested, transactional or holding based, require high volumes and mobile apps, or be large ticket requiring dedicated personal services to an elite clientele.

Once you have laid out your Trust Plan, your advisor will prepare a detailed Project Proposal.

### 打造你的信托

与您的顾问合作，选择适合您需求的工具和方法。

您的信托可为归属或非归属的；用于交易或持有的；需要大成交量和移动应用程序的；或者大宗交易并需要给精英客户提供专门的个人服务。

一旦您制定了您的信托计划，您的顾问将准备详细的项目提案。

### Establishment

Once you have reviewed and agreed on the Trust Plan we will begin implementation of your trust. This process includes agreeing fees expenses and final contract language, finalization of your trust deed, development of processes perhaps including an app and opening the various specific institutional banking and or brokerage account for the operation of your Trust. Your Itinerary is complete.

### 建立

当您已经审阅并同意信托计划，我们将开始执行您的信托。此过程包括同意费用、支出和最终合同内容，最终确定您的信托契约，开发流程（可能包括应用程序）以及为您的信托运营开设各种特定机构银行和/或经纪帐户。您的路线图已经完成。

### Good to Go,

With your Itinerary in hand, begin your journey.

Working with your trust you can reach out for the goals and achieve milestones along the way. Our staff will be with you each step of the way ensuring that your program fits your needs and achieves... Your Goals!

### 全面开展工作

您的路线图已在您的手，可以开始您的旅程。

与您的信托一起努力，就可以实现目标，并在过程中达到一个个里程碑。我们的员工会陪伴您走过每一步，确保您的计划符合您的需求并实现..... 您的目标!

## Trusts in Action 信任行动

Trusts may hold many asset classes

信托可持有许多资产类别

### QUALIFIED ASSET CLASSES

CRYPTO CURRENCIES

加密货币

SHARES

股票

PRIVATE PLACEMENT

私人配售

FINE ART

艺术

FOREX

外汇

REALESTATE

房地产

EQUITIES

证券

SYNDICATIONS

组合/银团

DEVELOPMENTS

发展

COLLECTABLES

精品

## Trusts and FinTech 信托和金融科技

Trusts may be used for a wide variety of business purposes. Many of the tried and true types of Trusts may be operated through online or mobile applications, reducing the cost of operations to much lower levels and dramatically increasing the reach of the Trust.

信托可用于多种商业目的。可以通过在线或移动应用程序来运行许多久经考验的真实信任类型，从而将运营成本降低到更低的水平，并显著增加信任的范围。

Applications based on the internet or Mobile phone platforms may include:

互联网或手机平台的应用程式的应用可包括：

Payment and remittance systems.

付款和汇款系统；

Registration and donation apps for charitable Trusts.

慈善机构信托应用程序的注册和捐赠；

Crowd funding

公众集资/众筹；

Micro finance lending.

小额贷款；

Registration and Trading for Crypto Currencies

加密货币的注册和交易；

Streamlining Registration ,AMLO compliance, for trading and near banking functions.

简化注册、反洗钱条例的合规、交易和接近银行的功能。

Your Trust advisor can assist you in defining the Trust & business operations to fit your business, regulatory compliance and reporting needs.

您的信托顾问可以帮助您拟定信托和业务的运营，以

Working with third party app developers we can help you to build fast effective applications for wide or even viral adoption by your potential membership. In today's mobile world with the right app, even the sky is no limit.

满足您的业务、法规遵从和报告需求。

与第三方应用程序开发人员合作，我们可以帮助您建立快速有效的应用程序，以便您的潜在会员广泛甚至散播式地采用。在今天的移动手机世界中，使用正确的应用程序，即使在天上也没有限制。



## ISSUER BENEFITS

Ease of doing business in Hong Kong;

Minimal Regulation;

Robust rule of law and transparency;

Reporting requirements & costs are significantly less in Hong Kong than many international locations, which helps to enhance absolute returns on investments;

No regulatory investment restrictions in Hong Kong;

Exempted from most securities regulations;

Credibility and transparency;

Hong Kong Trust Law

No limitation on perpetuity

No limitation on trusts retaining or distributing income

Enhanced protection for Settlor and Beneficiary Rights

## 对发行人的好处

易于在香港经商;

最小规则;

健全的法治和透明度;

香港的财报费用远低于其他国际地区,这可提升投资的绝对回报;

香港的检管对投资方针并无限制;

豁免大部分证券检管法规;

高度可靠及透明;

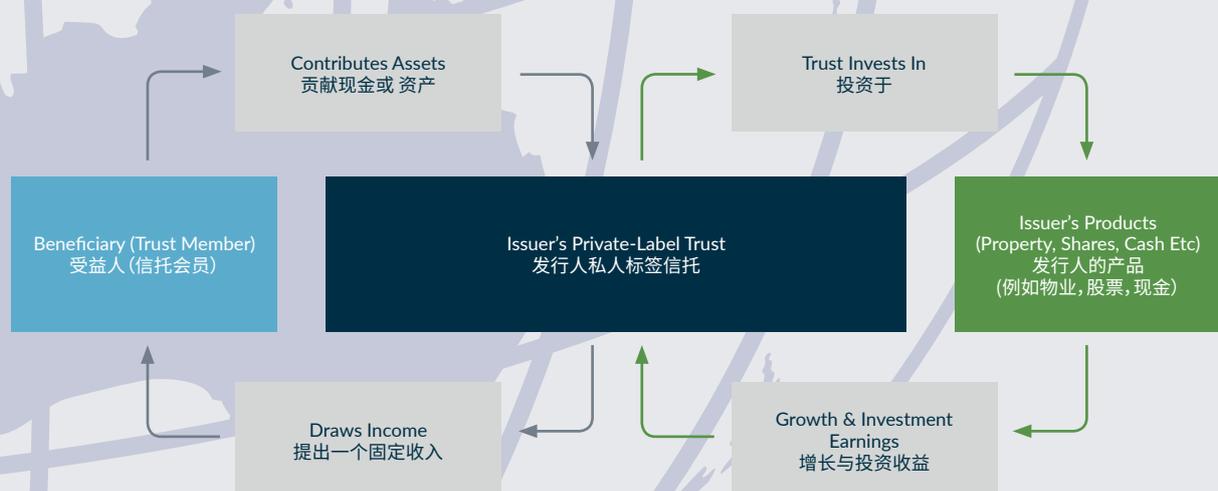
香港信托法

对永久性没有限制

对信托保留或分配收入没有限制

加强对定居者和受益人权利的保护

## FLOW CHART 流程图



# Marathon Products & Services

# 迈库企业服务有限公司 产品与服务

MARATHON CORPORATE SERVICES LIMITED is licensed as Trust or Company Service Provider in Hong Kong under the Anti Money Laundering and Counter Terrorist Financing Ordinance (Cap 615). We Offer the following services:

邁庫企业服务有限公司已根据《打击洗钱及恐怖分子资金筹集条例》(第615章)在香港获得信托或公司服务持牌人的许可。我们提供以下服务：

Trust and Fiduciary Services  
Trust Administration, Accounting, Valuation and Reporting  
Company Secretarial services  
Charitable Trusts  
Trusts for Education, Medical Protection of Invalids and Aged Care Purposes  
Estate and Succession Programs  
Custodial Services  
Escrow Services  
Nominee Services  
Employee Share Option Trusts  
Fund administration services  
Share Registry and Transfer Agency for Private Equity Arrangements  
Trade and Commercial Solutions

信托与受信服务  
信托管理·会计·评估和报告  
公司秘书服务  
慈善信托  
教育·医疗保障和老年护理目的信托  
遗产和继承计划  
保管服务  
托管服务  
代理人服务  
员工认股权信托  
资金管理服务  
股份登记和转让机构的私募股权安排  
贸易和商业解决方案

## Product range:

ORSO Retirement Trusts for Hong Kong and Overseas Beneficiaries  
Private Trust Arrangements  
Private Label Trusts  
Business Trusts  
Ready-made or tailored Trusts.

产品范围：  
香港及海外受益人公积金退休信托  
私人信托安排  
私家品牌信托  
商业信托  
现成或量身定制的信托

# Business Trust Worksheet

# 商业信托工作表

<b>Jurisdiction</b>	Hong Kong and International	管辖权	香港和国际
<b>Registration</b>	Private Label or Business Trusts are non registered trusts from a taxation point of view	注册	从税收的角度来看，自有品牌或商业信托为非注册信托
<b>Purpose</b>	Private Label or Business Trusts may serve a wide variety of objects or purposes. Your lawyer or trust representative may help you to determine how a Trust may be configured to meet your objectives.	目的	自有品牌或商业信托可以服务于各种各样的对象或目的。您的律师或信托代表可以帮助您确定如何配置信托以实现您的目标。
<b>Format</b>	Non-vested (Discretionary) Trust or Vested Trust.	形式	非归属（自主决定）信托或归属信托。
<b>Included in HK DTAs</b>	Transactions and income generated by this trust are deemed to have been completed, charged or paid in Hong Kong. All legal parameters of the trust are based in HK law and occur under applicable Hong Kong Law.	包含在香港双重征税协议	本信托的交易及产生的收入被视为已在香港完成，收取或支付。信托的所有法律参数均以香港法律为依据，并根据适用的香港法律发生。
<b>DTA based on Income Tax at the source</b>	Not applicable	基于所得税的双重税收	不适用
<b>DTA based on Income Tax where resident</b>	Not applicable	基于所得税的双重税收	不适用
<b>OECD compliant</b>	Not applicable	符合经合组织标准	不适用
<b>IOPS recognized</b>	Not applicable	IOPS认可	不适用
<b>Compliance with FATCA and CRS</b>	√ MCOSEV FATCA GIIN CRS Reporting as required for income paid out dependent on Tax Jurisdiction of Member	符合FATCA和CRS	√ MCOSEV FATCA GIIN 根据会员的税收管辖权支付的收入所需的CRS报告
<b>PRC Recognition</b>	Not applicable	中国承认	不适用
<b>Registration with or recognition by UK HMRC</b>	Not applicable to Non registered Trusts	英国HMRC注册或认可	不适用于非注册信托
<b>Privacy</b>	Beneficial ownership is not implied by participation in a Non Vested or discretionary trust. Assets held in non-vested or discretionary Trusts are not legally reportable as assets or beneficially owned until such time as there is a designation of a specific beneficiary. Under HK Rules there is no perpetuity limitations nor penalties for accrued assets or incomes held in trust.	隐私	参与非归属或自主决定信托并不意味着有实益所有权。在非归属或全权信托中持有的资产在指定特定受益人之前不能作为资产或实益拥有在法律上报告。根据“香港规则”，对信托持有的应计资产或收入不存在永久性限制或处罚。
<b>HK investment restrictions on investments</b>	Do not apply	香港投资限制投资	不适用
<b>UK HMRC Investment Regulated Pension Rules</b>	Do not apply	英国HMRC投资监管养老金	不适用
<b>Scheme Permissions</b>		计划权限	
<b>Accounts</b>	Up to two allocation accounts, at Member choice, at Trustee discretion	帐户	最多两个分配帐户：由会员选择，由受托人酌情决定
<b>Risk-graded portfolios</b>	√	风险评级组合	√
<b>Open architecture</b>	√	开放式架构	√
<b>IA/DFM</b>	√	投资顾问/全权基金经理	√
<b>Crypto Currencies/ Digital assets</b>	√	加密货币/数字资产	√
<b>May pension current income</b>	No	年金可作当期收入	没有
<b>May pension historic earned income</b>	No	年金可作历史收入	没有
<b>May buy real estate</b>	√ subject to foreign ownership restrictions in target jurisdictions.	可购买房地产	√受目标司法管辖区的外国所有权限制。
<b>Currency</b>	RMB, €£, US\$ and others at Trustee discretion	货币	受托人酌情决定人民币，欧元，英镑，美元及其他货币
<b>Contributions</b>		贡献	
<b>Maximum overall limit per programme</b>	Unlimited	每个程序的最大总限制	无限
<b>Minimum Contribution</b>	Subject to Settlor/ sponsor	最低贡献	以财产授予人/保人为准
<b>Personal Contribution from current earned income</b>	Unlimited	当前收入的个人贡献	无限

# Business Trust Worksheet

# 商业信托工作表

Services and Fees		服务和费用	
<b>Trust set up fees - Settlor or Sponsor</b>	USD50,000 + subject to Quotation based prices on below. (or RMB/£/€equivalent)	信托成立费用 - 财产授予人/保荐人	5万美元以上，以下面的报价为准。(或人民币/英镑/欧元等值)
<b>Trust Deed</b>	USD25,000 to 50,000 Subject to complexity	信托契约	25,000至50,000美元，根据复杂程度
<b>Trust administrative set up</b>	USD10,000 to 25,000 Subject to Admin and reporting requirements	信任行政设置	10,000至25,000美元，受行政和报告要求的约束
<b>C/S Mobile App</b>	USD30,000 to 50,000	C / S移动应用程序	30,000到50,000美元
<b>Trust Forms &amp; materials</b>	USD5,000 to 25,000 depending on applicable requirements	信任表格和材料	5,000至25,000美元，具体取决于适用的要求
<b>Marketing Setup &amp; Initial Advertising budget</b>	Based on requirements agreed between the Settlor/Sponsor and the Trustee	营销设置和初始推广预算	根据财产授予人/保荐人与受托人之间达成的要求
<b>Member Fees</b>	All Member fees are subject to agreement with the Settlor/ Sponsor and are based on the particulars of the Trust to be established.	会员费	所有会员费用均须与财产授予人/保荐人达成协议，并以要建立的信托的详情为基础。
<b>Initial or Establishment fee</b>	Initial fees should cover the start-up admin and compliance costs anywhere from USD 125 to 5,000 depending on complexity and degree of automation possible given the Trust and Client parameters	初始或成立费用	初始费用应包括启动管理和合规成本，从125至5,000美元起，取决于复杂程度和信托和客户参数自动化程度
<b>Subsequent annual Trust fees</b>	Annual Trust fees may or may not be required depending on whether the Trust is transaction or holdings drive. Active Transaction based Trusts will charge fees on transactions. Passive or holding type trusts will require an annual fee to cover revenue requirements of the Trustee	随后的年度信托费用	根据信托是交易还是持股驱动，可能需要或可能不需要年度信托费用。基于活跃交易的信托将收取交易费用。被动或持有型信托将需要年费才能满足受托人的收入要求
<b>Transaction fees</b>	Transaction fees to be based on the type volume and frequency of transactions.	交易费用	交易费用根据交易的类型数量和频率而定。
<b>In-specie transfer-in of another investment/ platform (i.e. a fund or PPB, or other dealing platforms)</b>	√ Fee-based (up to USD450 per hour) Only by agreement with Trustee Amount transferred-in counts towards AUA	另一投资/平台 (即基金或PPB或其他交易平台) 的实体转入	√ 收费 (每小时最高450美元) 仅于与受托人达成协议 转入金额计入AUA
<b>Trust Adviser assistance (Member-specific cases)</b>	√ Fee-based	信托顾问协助 (会员特定案例)	√ 收费的
<b>Incidentals</b>	√ As per Fee Schedule	杂费	√ 根据收费表
<b>Time and charges fees (General)</b>	Fee-based work is charged on a time-used basis unless listed in the MPRT Fee Schedule The Trustee may charge up to USD 950 per hour depending on the technical complexity of the task and the legal competency required. External costs charged separately. Banking charges are charged directly to the Member's account	时间和费用 (一般)	除非在MPRT费用表中列出，否则收费工作按时间收取费用 受托人每小时最高可收取950美元，具体取决于工作的技术复杂程度和所需的法律能力。 外部费用另行收取。 银行手续费直接向会员账户收取

## Disclaimer

Marathon Corporate Services Limited (MCOSEV) has issued this document in good faith, reflecting the Company's understanding of Hong Kong ORSO, Hong Kong tax, international tax matters and the competitive review of Hong Kong versus other jurisdictions where Trust Services are on offer. This brochure offers generic information only.

MCOSEV does not give Investment advice. MCOSEV's role is solely to act as Administrator and Trustee.

Potential Members should not construe any statement in this document as personal advice.

The information contained herein should only be evaluated in the context as general background information. Potential Members should seek professional tax and investment advice before applying to be a Member of the Scheme.

Any attempt by a Member to abuse the Trusts may result in that Member losing international recognition on his/her benefits or having their tax planning interpreted within the meaning of international GAAR rules or being subject to action by relevant tax authorities.

## 放弃

马拉松企业服务有限公司 (MCOSEV) 已真诚地发布此文件，反映了公司对香港ORSO、香港税务、国际税务事宜的理解以及对香港与提供信托服务的其他司法管辖区的竞争性审查。本手册仅提供通用信息。

MCOSEV不提供投资建议。MCOSEV的职责仅仅是担任管理员和受托人。

潜在会员不应将本文件中的任何陈述作为个人建议。

此处包含的信息仅应作为一般背景信息在上下文中进行评估。在申请成为该计划的会员之前，潜在会员应寻求专业的税务和投资建议。

会员滥用信托的任何企图都可能导致该会员失去对其利益的国际承认，或者其税务计划被解释为国际GAAR规则的含义或受到相关税务机关的约束。