



AMICORP DIFC ICC FLEXIBLE, TAX-EFFICIENT FUND STRUCTURING WITH FULL LEGAL SEGREGATION

AMICORP GROUP

As a forward-looking asset owner, manager, or investor, you're always seeking efficient ways to scale and structure with clarity and confidence, especially when managing multi-strategy portfolios or cross-border investor bases. Whether you're expanding into the United Arab Emirates ("UAE") market, isolating private assets, raising capital across divisions, or managing feeder structures from Europe or Asia, you want a platform that can deliver on speed, control and efficiency. The Incorporated Cell Company ("ICC") model in the Dubai International Financial Centre ("DIFC") was introduced in 2024 as a plug-and-play fund platform and delivers exactly that.

Amicorp Capital (DIFC) Ltd. is one of only a few Dubai Financial Services Authority ("DFSA") licensed firms with a fund platform endorsement, offering a ready-to-deploy fund structure allowing the creation of Multiple incorporated cells. Each acting as a separate legal entity giving fund managers or sophisticated investors direct access to a fully regulated, tax-advantaged fund solution.

KEY FEATURES INCLUDE

Separate legal personality for each Incorporated Cell ("IC"): Similar to structures seen in Luxembourg's SICARs or Guernsey's ICCs, where each cell has its own legal identity.

Risk segregation across fund strategies (e.g., PE/VC, Real Estate, Fund of Fund): Common in Singapore's VCC funds and Cayman SPCs, where asset ring-fencing protects investors across strategies.

Open- and closed-ended fund flexibility: As found in Ireland's ICAV or UK-based AIF structures, offering fund managers flexible redemption and liquidity frameworks.

Exempt and Qualified Investor Funds ("QIFs") under the same umbrella: A setup mirrored in Malta and Luxembourg, where multiple investor categories can be managed within a single structure.

No withholding tax on repatriation: Competitive edge akin to jurisdictions like the United Arab Emirates and The Netherlands, known for efficient profit repatriation.

Corporate tax exemptions available per IC, with applicable conditions: Similar to Mauritius GBC entities or Singapore 13O/13U funds, where exemptions are linked to economic substance, regulatory approval for the IC to be a Qualifying Fund by FTA.

Access to 130+ Double Taxation Agreements ("DTAs"), with 76 currently active: Comparable to Singapore and Cyprus, both offering extensive treaty networks that enhance global tax efficiency.

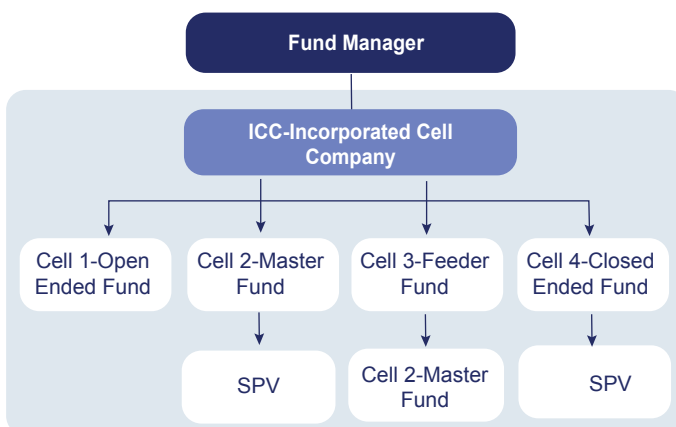
Bilateral Investment Treaty ("BIT") protections to secure cross-border assets: Like those offered by Switzerland and India, where BITs safeguard foreign investor rights and reduce political risk.

SOLUTIONS IN ACTION

1. FUND MANAGEMENT PLATFORM WITH MULTI-STRATEGY SETUP

A regional asset manager launched several ICs within a single ICC umbrella, each housing a separate investment strategy (e.g., Real Estate, PE, Hedge Funds).

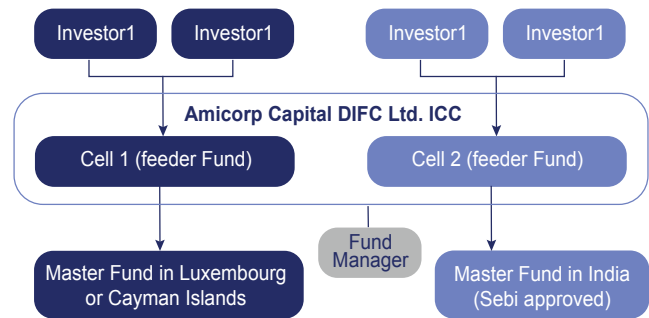
The result: Full segregation of investor capital, simplified oversight, and low setup costs.



2. FEEDER FUND INTO CAYMAN OR LUXEMBOURG

An EU-based promoter structured a feeder fund through an IC in DIFC, channelling capital into a Cayman Master Fund. This gave non-U.S. investors DTA benefits, transparency, and access to offshore performance, all under a regulated UAE platform.

The Fund Manager provided all the necessary fund management infrastructure to the asset owners allowing them to seed their own sub-fund with their assets in-kind and find additional investors.



3. PRIVATE WEALTH STRUCTURING

A high-net-worth client used ICs to isolate Real Estate, Venture Holdings, and Digital Assets. Each was held separately, with tailored governance and efficient repatriation strategies, enhanced by the UAE's strong treaty network and zero capital gains tax.

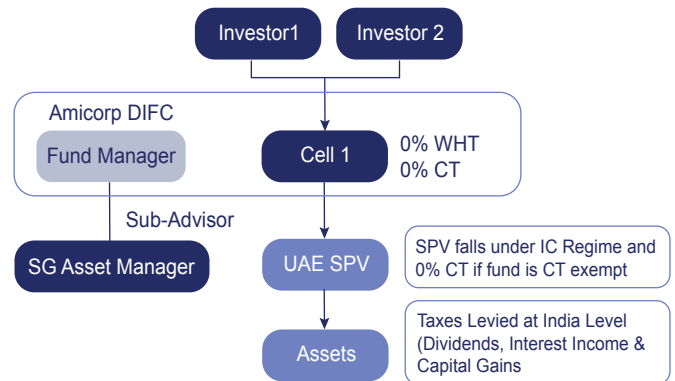
4. ISSUERS & INSURANCE COMPANIES

A regional insurer used the ICC to launch segregated strategy funds, each with its own liabilities. A corporate issuer created ICs for securitized note issuance and SPV management.

5. INDIA-FOCUSED STRATEGY VIA UAE

A Singapore-based investment advisor used a DIFC ICC to structure an Indian investment fund.

They were able to take advantage of the India-UAE DTA and BIT, which optimized tax and enhanced investor protections. The IC applied for Foreign Portfolio Investor ("FPI") status to enable direct listed investments.



WHY AMICORP?

- **Fund Platform Endorsement** in DIFC and regulated by DFSA
- **Fully licensed** to provide end-to-end services: fund structuring, management, and fund administration. (Fund administration will be provided through Amicorp Fund Services (DIFC) Ltd)
- **Speed-to-market** solutions and streamlined onboarding
- **Operational simplicity** with central reporting and shared services
- **Cost efficiency** via shared platforms and low setup costs
- **Trusted one-stop shop** backed by decades of global structuring experience

ICC COSTS

One time Setup: USD 15,000

Annual management Fee:

- On approval of fund from DFSA: USD 10,000 PA
- Upon the first subscription: minimum of USD 30,000 PA (inclusive of USD 10K above)
- Total Cost for AUM up to USD 15 million, the annual fee will be 25 basis points inclusive of USD 30,000 PA

AMICORP DIFC PLATFORM SERVICES

- Amicorp Capital (DIFC) Ltd.: Fund Management
- Amicorp Fund Services (DIFC) Ltd.: Fund Administration, NAV calculations (in progress)
- Amicorp Global Services: Accounting, Compliance, Corporate Secretarial

To find out more about the Amicorp DIFC ICC or how we can support your investment strategy, contact our team by clicking [here](#) or scanning the QR code.

