

## **Enterprise Zone Property Unit Trust (EZPUT)**

For taxation purposes an EZPUT is an unauthorised unit trust which is invested entirely in property in Enterprise Zones. Providing it satisfies the conditions about the nature of the trust and its investments as set out in regulations (SI 1988/267), then the special rules for UUTs in section 469 ICTA do not apply.

The effect of this is that income, expenses and reliefs (including EZA) that relate to the scheme property arise directly to the investors. For capital gains purposes however, section 99 TCGA does apply to an EZPUT, which means that any gains arising on scheme property are chargeable on the trustees.