

Direct v. Indirect OZ Investment Requirements

Requirement	Direct Investment	Indirect Investment
Percentage of QOF's assets that must be invested in qualified opportunity zone business property.	90% (70% within zone) or 63%	N/A
Percentage of QOF's assets that must be invested in OZ stock or partnership interests.	N/A	90%
Percentage of OZ Fund's assets that may be held in cash or other liquid investments.	10% (together with intangible property)	5% plus reasonable working capital
Percentage of OZ Fund's assets that may be held in intangible property.	10% (together with cash)	Unlimited, but intangible property must be used in trade or business
Percentage of OZ Fund's assets that must be invested in tangible property.	90%	No minimum
Percentage of gross income that must be derived from OZ.	None	50%
Ineligible Businesses.	None	Sin Businesses