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## **LATEST NEWS ON EXIT TAXATION: IMMEDIATE TAXATION OF BUSINESS SHARES UPON TRANSFER OF DOMICILE TO SWITZERLAND DISPROPORTIONATE ACCORDING TO ECJ**

IN SPRING 2019, THE EUROPEAN COURT OF JUSTICE (ECJ) DECIDED THAT IN CERTAIN CONSTELLATIONS A DEFERRAL OF PAYMENT OF THE TAX PAYABLE IN THE EVENT OF A TRANSFER OF DOMICILE (SECTION 6 GERMAN FOREIGN TRANSACTION TAX ACT [AUSSENSTEUERGESETZ - ASTG]) MUST ALSO BE GRANTED WHEN RELOCATING TO SWITZERLAND, I.E. ALSO IN RELATION TO A THIRD COUNTRY. THIS RESULTS FROM THE AGREEMENT ON THE FREE MOVEMENT OF PERSONS, WHICH WAS CONCLUDED BETWEEN THE MEMBER STATES OF THE EU AND SWITZERLAND IN 1999. [\(more...\)](#)