

31. March 2023

NEW REAL ESTATE TRANSFER TAX PITFALLS IN SHARE DEAL TRANSACTIONS

IF THE SIGNING AND THE CLOSING OF THE SHARE DEAL OCCUR AT DIFFERENT TIMES, THE TAX AUTHORITIES CONSIDER THAT THERE ARE TWO TRANSACTIONS THAT ARE EACH SUBJECT TO REAL ESTATE TRANSFER TAX. AS A RESULT, REAL ESTATE TRANSFER TAX MAY BE ASSESSED MORE THAN ONCE FOR ONE AND THE SAME TRANSACTION. ACCORDING TO A NEW PROCEDURAL NORM, THE RISK OF DOUBLE TAXATION CAN BE AVOIDED, IF A NOTIFICATION HAS BEEN MADE IN DUE TIME AND COMPLETE IN ALL PARTS BOTH AT THE SIGNING AND AT THE CLOSING. [\(more...\)](#)