July 2019

wts global

WTS Global Mobility Newsletter

Editorial

Dear Reader,

It is our pleasure to present you the first edition of our WTS Global Mobility Newsletter.

In times of globalization, the importance of international employee deployment is growing. We are faced with an increasing complexity of managing your expatriates' cross-border taxation, social security, legal and immigration-related matters. The legal regulations in these fields are not only subject to constant change but they are also becoming more and more complex when applied in different jurisdictions at the same time.

This newsletter offers you a brief overview of recent or expected changes in the area of Global Mobility. In **Sweden**, the Economic Employer Concept will be implemented in the near future – our Swedish colleagues describe the main impact of the proposed rules. In this issue we also report on the amendment of the "30% ruling" in the **Netherlands** and the changes in tax and social security obligations affecting **Belgian** companies for benefits granted by foreign affiliated companies. Furthermore, the newsletter includes a feature about the new income tax collection systems in **France** and the recent IIT law changes in **China**, both effective from January 2019. And – of course – our **UK** colleagues provide a Brexit update from a social security perspective.

Last but not least we have included three articles from our **German** and **Austrian** colleagues with a particular focus on EU law: They give an overview about the expected consequences due to the new EU Posting of Workers Directive as well as the current status with regard to A1 certificates during short business trips. Finally, the consequences of the EU reporting and documentation obligations are shown from an Austrian perspective.

A special thank you goes out to our WTS Global partners, who contributed to this first WTS Global Mobility Newsletter as a starting point for a series of newsletters to follow covering further jurisdictions.

We hope you will find this newsletter useful and we would appreciate your feedback and suggestions.

Yours sincerely,

Frank Dissen

WTS Global Mobility Team

wts global

Contents

Austria: Reporting and documentation obligations for employee secondments to Austria ... 3

Belgium: Changes in tax and social security obligations affecting Belgian companies for benefits granted by foreign affiliated companies ... 4

China: China's new IIT law ... 5

France: New income tax collection system ... 7

EU-Member States: The new EU Posting of Workers Directive ... 8

EU-/EEA-Member States & Switzerland: Business Trips and A1 certificate of coverage ... 10

Netherlands: 30% ruling shortened to five years as of 1 January 2019 ... 11

Sweden: The Economic Employer Concept to be implemented in Sweden ... 12

United Kingdom: Brexit update – Social Security implications for Global Mobility ... 13

Please find the complete list of all contacts at the end of the newsletter.

Austria

Reporting and documentation obligations for employee secondments to Austria

Based on the EU Posting of Workers Directive (96/71/EC) and the Enforcement Directive (2014/67/EU), EU member states can provide for a number of compliance obligations for cross-border employee secondments. The relevant regulations that foreign companies have to comply with in Austria are regulated in the so-called "Wage and Social Dumping Control Act". The present article gives a brief overview of which types of secondments are covered by this Act, how the reporting obligations in Austria are structured, which documents must be kept available for possible audits during the posting to Austria, and which penalties companies may face in case of compliance violations.

Scope of the "Wage and Social Dumping Control Act"

In principle, the "Wage and Social Dumping Control Act" applies to every type of posting of a worker to perform work in Austria from another EU Member State or third country. However, the law itself provides for a comprehensive catalog of exceptions that do not trigger the reporting and documentation requirements described below. These exceptions include, for example:

- → Business meetings without the provision of additional services
- → Participation in seminars and lectures without providing additional services
- → The participation in fairs (except the construction and dismantling of the exhibition facilities)
- → Visiting and attending congresses
- → Cultural events, which take place as part of a tour in which the event in Austria is only of minor significance, as far as the employee has to perform his work for at least a large part of the tour
- → Participation at and handling of international sports competitions
- → The work of an employee who receives a gross monthly salary of at least EUR 6,525 within a group of companies
- → The posting of certain specialists within a group of companies, if the duration of the posting does not exceed two months per calendar year.

Reporting requirements

Postings from other EU member states or Switzerland must be reported via an online portal before starting work in Austria. In the case of hiring out of labour constellations, the form ZKO-4 should be used, for all other types of postings form ZKO-3 has to be filed.

Documentation requirements

During the period of the posting, the employer must provide the following documents in the event of an audit on-site:

- → Employment contract
- → Payslips
- → Salary statement or bank transfer documents
- → Payroll records

- Working time records
- Documents relating to wage level determination (in order to enable the audit authorities to check on fulfilment of the Austrian minimum wage requirements)
- A1 certificate of coverage
- Copy of the ZKO-3 or ZKO-4 notifications

The documents must always be provided in German, the employment contract may also be submitted in English.

Penalties in case of compliance violations

The law provides for severe administrative penalties in the event of a breach of the reporting and documentation obligations set out above:

- Penalty for failing to submit the ZKO notification: EUR 1,000 to 10,000 / employee
- Penalty for breach of documentation requirements: EUR 1,000 to 10,000; if more than three employees are affected between EUR 2,000 and EUR 20,000

Karl Waser
karl.waser@icon.at

Belgium

Changes in tax and social security obligations affecting Belgian companies for benefits granted by foreign affiliated companies

In internationally structured groups, foreign parent companies often grant benefits, such as restricted stock units, directly to the employees of their Belgian subsidiaries.

Social security

It was generally applied and defended that no Belgian social security contributions were due on such benefits if there was no direct or indirect involvement by the Belgian employer.

However, in its instructions for the 3rd quarter of 2018, the Belgian National Social Security Office has published a new position. It states that a benefit granted by a foreign parent company to the employees of a Belgian subsidiary is subject to social security tax if that benefit is the result of activities performed in execution of the employment agreement or is related to the position the employee holds with the employer.

We are of the opinion that this position is in breach of the law. International groups with cross border benefits plans may need to seek advice on the matter to estimate the risks, consequences and possible actions.

Tax

Before the recent changes, Belgian subsidiaries only had a wage withholding obligation and salary slip reporting obligation when they directly or indirectly involved with respect to benefits granted by the foreign parent company to its employees.

wts global

The law has been changed and as a result, the Belgian employer is subject to wage withholding tax and reporting obligations if an individual receives the benefit **by reason of or further to his professional activity with the employer.** Hence, in practice, if a foreign affiliated company grants a benefit, the Belgian employer is automatically obligated to withhold Belgian wage withholding tax and report the benefit on Belgian tax statements, irrespective of whether the Belgian employer was involved in granting the benefit.

The reporting obligations enter into force for grants made as of January 2019 (salary slips to be issued in 2020), whereas the withholding obligations apply on benefits granted as of March 2019.

A review of benefits plans!

The aforementioned changes imply that Belgian subsidiaries and their parent companies are advised to review their existing or envisaged benefit plans.

They need to assess their obligations under these new rules and have to review the current internal reporting processes, in order to ensure that the Belgian employer is notified of payments granted from abroad.

The payroll process has to be adjusted and companies may have to tackle practical issues such as the wage withholding tax on the benefit in kind exceeding the regular salary in cash.

In case of international employment, it should be taken into account that the new rules only apply to individuals having a professional relationship with the Belgian subsidiary.

Furthermore, the cost of an international plan and the administrative and financial compliance may require reorganisation of such plans and possibly the application of other incentive schemes.

Katrien Bollen
katrien.bollen@tiberghien.com

China

China's new IIT law

A new individual income tax ("IIT") law has come into effect on 1 January 2019. The tax residency stipulations for non-domiciled individuals have been amended by the new IIT law.

Tax residents vs. non-tax residents

In practice, tax residency should be firstly determined for a non-domiciled individual's initial IIT filing in a calendar year, as the tax consequences for tax residents and non-tax residents are different under the new law (as compared page down):

Items	China tax residents	Non-tax residents
Definition	Individuals who stay in China for 183 days or more in a calendar year	Individuals who stay in China for less than 183 days in a calendar year
Taxable income (Note)	Both China and foreign sourced income	China sourced income only
Comprehensive income	Employment income, personal service income, author remuneration, and royalties	Not applicable
IIT calculation for a tax year	Annual basis	Monthly basis
Monthly withholding method for employment income	Accumulative income base	Separate month income base
Applicable income brackets for monthly withholding	Annual income brackets	Monthly income brackets
Allowable deduction	RMB 60,000 per year	RMB 5,000 per month

Note: The taxation provisions are summarised below:

		Income derived from China		Income derived from overseas	
Tax residency	Duration in China	Paid inside China	Paid outside China	Paid inside China	Paid outside China
Non-tax residents	~ 90 days	Taxable	Exempt	Non-taxable	Non-taxable
	90 days ~ 183 days	Taxable	Taxable	Non-taxable	Non-taxable
Tax residents	Less than 6 years	Taxable	Taxable	Taxable	Exempt
	More than 6 years	Taxable	Taxable	Taxable	Taxable

Six-year rule

For non-domiciled individuals who have stayed in China for more than six consecutive years, their worldwide income is taxable, if they have stayed in China for 183 days or more in a calendar year from the seventh year onward. The “six year” refers to stays in China for 183 days or more in each of six consecutive years, without any single trip outside China for more than 30 consecutive days in any calendar year within the six years.

The best approach to avoid being taxed on worldwide income is to travel outside China for more than 30 consecutive days in a calendar year. Then, the existing six-year period can be broken up and a new six-year period will start being counted in the following year.

Non-taxable benefits for tax residents

Non-domiciled individuals meeting the China tax residency criteria during 2019 and 2021 can opt for the existing tax exemption policies (option a) or the new deductions policies (option b) as listed in the table below.

Tax exempted benefits (Option a)	New deductions (Option b)
Housing rental (no limitation)	Housing rental (with limitation)
Children education fee (no limitation)	Children education (with limitation)
Language training fee (no limitation)	Continuing education (with limitation)
Home leave	Housing loan interest
Meal and laundry	Support for elderly
Relocation allowance	Serious illness medical treatment
Travel expenses	

As of 1 January 2022, some benefits in option (a) will cease to be effective. Only non-domiciled individuals regarded as China tax residents can enjoy option (b). Each deduction item under option (b) is capped, as opposed to unlimited deductions in option (a). Hence, foreign individuals' IIT costs are expected to rise at this point.

Martin Ng
martin.ng@wts.cn

Elena Chen
elena.chen@wts.cn

France

New income tax collection system

France has been one of the last OECD member countries adopting a pay-as-you-earn (PAYE) system. With effect from 1 January 2019, France stopped collecting the individual income tax (IIT) with a lag of one year and introduced an income tax levied at the source by the employer or, depending on the form of income, by the taxpayer him- or herself.

The income types affected by the PAYE system are mostly salaries, directors' fees, income of self-employed individuals, various types of allowances (health, insurance, etc.) and rental income.

French tax resident employment income is taxed under the PAYE system, but only the portion related to workdays in France. The part of salaries relating to workdays outside France is subject to instalments that are directly paid by the employee.

The new system does not apply to employees who are non-resident in France. These employees are liable to income tax in France in accordance with the provisions of the French tax code and the provisions of the applicable DTT.

This new system also applies to foreign employers, even if the employee is not under a French payroll. This is the case if they employ French tax resident employee having workdays in France.

The French tax authorities (FTA) calculate and communicate to the employer the rate of the levy that has to be withheld based on all incomes reported in the tax return.

The PAYE system does not exempt the taxpayers from filing IIT returns on a yearly basis in May. The tax already withheld on a monthly basis will be deductible from the amount of the total income tax due, which includes other income not subject to withholding such as capital gains.

Employers not located in the EU, Iceland or Norway need to appoint a tax representative to accomplish all the formalities described below.

Employers located in the EU, Iceland or Norway have several formalities to accomplish in order to comply with the new French system.

First of all, they have to ensure that they have a SIRET identification number. If not, they need to fill out an EE0 form and submit it to "le Service des entreprises étrangères".

The second step is that they need to ensure that they have created a dedicated account on the website www.net-enterprises.fr. Such an account is required in order to submit the list of their French tax resident employees. This list has to be sent to the FTA via the DSN form for the employees subject to French mandatory social security and retirement contributions or via the PASRAU form for the employers who are not subject to those contributions.

Then, based on these filed forms, the FTA transmits to the employer the tax rate for each employee, which has to be applied on the taxable basis of the wage.

After being withheld on net pay, this withholding is paid by the foreign employer via an online transfer made from the company's dedicated portal on the website of the FTA (impots.gouv.fr). If the employer has no dedicated portal on that website, it must be created.

The deadline for the payment of the withholding tax is the same as the one to file the DSN or PASRAU form: it is the 5th, 10th or the 15th of the month of payment of the salary income subject to the withholding tax.

Finally, each month, a DSN or a PASRAU form has to be filed in order to declare the withholding tax calculated and to pay the income tax for the previous month. This declaration is also used to update the list of employees and to enable the FTA to provide the employers with any update of the tax rate.

Laura Touitou
*laura.touitou@
villemot-wts.com*

EU-Member States

The new EU Posting of Workers Directive

The new Directive entered into force on 30 July 2018 and amended the original Directive 96/71/EC of 1996. The EU Member states have until 30 July 2020 to adopt and publish their national laws complying with the new Directive.

Purpose of the new directive

The main purpose of the original Directive of 1996 was to establish and implement the freedom to provide services. Besides this, another aim was to remove obstacles to the free movement of workers between Member States and to guarantee the protection of employment rights of individuals working temporarily in another EU Member State. Moreover, unfair competition between lower and higher-costing countries in the EU should be prevented. In order to ensure employers do not take advantage of subcontracting workers from low-wage countries, employers sending workers to another EU state were obliged to comply with the host country's "core set" of labour law provisions, including minimum wage, working hours, minimum paid annual leave and protection against discrimination. With the enlargement of the EU (expansion to Eastern European countries), the labour market situation in the EU has changed considerably. The new Posted Workers Directive is intended to enforce the principle of equal pay for locally employed and posted workers and thus better protect posted workers.

Equal Pay

Probably the most far-reaching adaptation of the Directive was made with regard to remuneration. The corresponding legislation has so far provided the term "minimum rates of pay", which has been replaced by the term "remuneration" to enforce the principle of "equal pay for equal work at the same place" – instead of complying with the national minimum wage of the host country only. This means that posted workers are entitled to the same remuneration (e.g. bonuses, allowances, holiday pay and Christmas bonus) as locally employed workers from day one. This does not only apply to statutory provisions, but also to provisions in collective agreements that have been declared generally binding.

Host-country employment rights and protections after 12 / 18 months

In addition, almost all local working and employment conditions of the host country will apply to posted workers after 12 months (18 months at the latest). In Germany, for example, continued pay entitlements and statutory minimum leave need to be considered.

Social security issues

The Directive does not provide for a direct impact on the social security law applicable to assignments. However, the assessment of the applicable law with regard to employment and social security law has been largely parallel in many cases so far. The new Directive breaks this parallelism. Instead of the 12 / 18 month threshold mentioned above, the EC regulations on the coordination of social security systems (EC Regulation 883/2004 and EC Regulation 987/2009) provide provisions for remaining coverage under the home country's social security scheme for a period of up to 24 months and, in case of a special agreement or a regular activity in several EU Member States, even longer or permanently.

Consequences

Not only higher wage costs for intra-European assignments are to be expected in the future due to the equal pay approach. Additional effort caused by the Directive also appears to increase significantly in practice – especially for the HR departments.

Frank Dissen
frank.dissen@wts.de

EU-/EEA-Member States & Switzerland

Business Trips and A1 certificate of coverage

The EC regulations on the coordination of social security systems within the EU- / EEA- Member States and Switzerland (in particular EC Regulation 883/2004) are, in fact, a true success story. Based on just a few paragraphs, the aforementioned EC Regulation determines which social security scheme applies for cross-border workers. The applicable legislation covers all branches of the social security system and prevents double payments to different social security schemes since the employee is subject to the legislation of a single Member State only. The A1 certificate of coverage needs to be applied to prove the remaining coverage under the home social security scheme. Once the A1 certificate has been issued by the competent social security authority, it is generally binding for everybody: the employee and his/her employer, the social security authorities in the home and host countries and even the national courts (this was confirmed several times by the European Court of Justice). So, in a nutshell - the A1 certificate of coverage is a very important document.

Administrative nightmare

The A1 certificate indeed makes sense if an employee is posted for several months from one EU Member State to another or regularly works in 2 or more EU Member States – even for an unlimited time period. However, requesting an A1 certificate for every single cross-border business trip within the EU- / EEA- Member States and Switzerland leads to an enormous administrative burden since it is mandatory regardless of the purpose or duration of the trip.

No minimum time period

The EC Regulation does not mention any minimum time period, so even for very brief cross-border business trips – e.g. one day – an A1 certificate needs to be applied for. What sounds astonishing, was already known in the 1970s. The “old” EEC Regulation 1408/71 stated an obligation to request a certificate of coverage regardless of the posting’s duration as well (known back then as an “E101” certificate).

Increase in controls

Even though the obligation to apply for certificates of coverage is not new, this topic gained importance due to an increase of controls conducted by authorities based on legal reporting and registration obligations for posted workers imposed by EU enforcement Regulation 2014/67/EU (please see Karl Waser’s article from Austria in this Newsletter). Notwithstanding that the transmission of the above-mentioned Directive into national law has led to 28 different implementations, there is one point all 28 EU Member States have in common: the A1 certificate is needed as as a proof of the applicable social security scheme. Some EU Member States focus their controls particularly on business travelers (e.g. France and Austria), and cases have come to light where significant administrative fines were imposed.

State of play

On 23 November 2018, the European Parliament proposed several amendments to EC Regulation 883/2004. Based on the proposal, a provisional agreement was published on 19 March 2019 - including the exemption from the obligation to apply for an A1 certificate for business trips. However, on 18 April 2019 no qualified majority was reached in the European Council and the decision about the proposed amendments has been postponed until the next European Parliament will be formed. Therefore, you currently still need to apply for an A1 certificate – even for very brief cross-border business trips.

Frank Dissen
frank.dissen@wts.de

Netherlands

30% ruling shortened to five years as of 1 January 2019

The 30% ruling is a specific tax regime for foreign employees that meet certain criteria and who are temporarily assigned to, or hired from abroad by an employer in the Netherlands. When meeting certain requirements, 30% of the employee's salary can be paid out as a tax-free allowance to cover extraterritorial costs. In addition, the employee may, at his/her request, benefit from a tax treatment as a non-resident taxpayer regarding income from a substantial interest and income from savings and investments.

In 2017 the effectiveness of the 30% ruling was evaluated and the results were published in a report. Although the 30% ruling was found to be both effective and efficient, several suggestions were included in the report to make the ruling more effective.

Mid-2018, the government announced that it would adopt the recommendation to shorten the period for which the 30% ruling is granted from eight years to five years as of 1 January 2019. It is important to note that initially this change would also apply to existing 30% rulings. Which meant that 30% rulings that were in place for longer than five years on 1 January 2019 would immediately end per that date. The aforementioned led to an ongoing debate and many expats felt mistreated. In the end this has resulted in the following transitional law:

- Individuals who have had the 30% ruling for five years or longer in 2019 or 2020: the transitional law applies for two years. The ruling will end ultimately on 31 December 2020.
- Individuals who have not had the 30% ruling for five years in 2019 or 2020: the transitional law applies up to 31 December 2020. The end date of their ruling will in principle be reduced by three years.

Schematically this looks like this:

The employee has a ruling with an end date in 2019 or 2020	The ruling will end on the end date mentioned on the decision issued by the Dutch tax authorities.
The employee has a ruling with an end date in 2021, 2022 or 2023	The ruling will end on 31 December 2020.
The employee has a ruling with an end date in 2024 or following years	The duration of the ruling will be reduced by three years.

Due to the shortened duration of the ruling, the period during which the employee may opt to be treated as a partial non-resident tax payer will also be shortened from eight to five years.

The employer is responsible to ensure that the ruling is correctly applied in payroll. Therefore, we recommend that employers verify internally the applicable 30% rulings and the correct end date of the rulings based on the transitional law applicable and instruct payroll in this respect.

Yvonne Bakker
yb@atlas.tax

wts global

Sweden

The Economic Employer Concept to be implemented in Sweden

The Swedish Government has proposed that the economic employer concept should replace the currently applied formal employer concept. The proposed rules were supposed to enter into force on 1 January 2019. However, due to the uncertain parliamentary situation in Sweden during the fall of 2018, the Swedish Parliament's vote on the proposal has been postponed (we expect the new rules to enter into force on 1 January 2020 at the earliest).

The proposed rules will affect foreign employers contracting or sending out employees to Sweden with regard to inter alia obligations to register themselves with the Swedish Tax Agency as a foreign employer, file a monthly payroll return on an individual level (PAYE-returns), and manage employee withholding (preliminary) tax.

This article aims to present a brief overview of the current, and proposed, Swedish legislation followed by a short comment regarding some of the consequences of the proposed legislation.

Current rules – the formal employer concept

Today, Sweden applies a formal employer concept. Employment income from a foreign employer to a limited Swedish tax-liable employee for work carried out in Sweden may be exempted from Swedish employment income tax, should the "183-day rule" be applicable. The rule is applicable when an employee is (1) employed and paid for by a foreign employer without a permanent establishment in Sweden and (2) the employee's stay in Sweden does not exceed 183 days during a twelve-month period.

Proposed rules – the economic employer concept

Under the proposed rules, the Swedish Parliament will introduce a Swedish version of the economic employer concept. The economic employer will be considered to be the company for which the work is actually performed, rather than the company which is legally and formally responsible for the employee and which pays out the salary.

An example of a situation previously covered by the 183-day rule, but that now will be covered by the proposed economic employer concept, is when construction staff (from a foreign staffing company) are hired by a Swedish construction company to do construction work at a Swedish manufacturing company's factory in Sweden.

However, a complementary proposal has been filed including an exception from the proposed changes, applicable for certain inter company transfers of employees. The exception states that shorter periods of work (not exceeding five consecutive days, and no more than 30 days in total during a calendar year) for employees in Sweden would not be covered by the proposed changes.

Comments – consequences of the proposed legislation

First and foremost, the 183-day rule will no longer be applicable when employees are "hired out" to perform work for a Swedish company.

Foreign employers sending out or contracting personnel to Sweden will be obliged to register themselves with the Swedish Tax Agency as a foreign employer, withhold preliminary taxes on salaries and file monthly payroll returns on an individual level (PAYE-returns).

Employees working in Sweden will not be required to register themselves with the civil registry of the Swedish Tax Agency.

Michel Weimer
michel.weimer@svalner.se

United Kingdom

Brexit update – Social Security implications for Global Mobility

One of the most significant issues for employers with a globally mobile workforce will be the impact and uncertainty of Brexit on existing social security arrangements between the UK and EEA member states. If the UK leaves the EU with a deal, then a transitional period will apply up to 31st December 2020 and the procedures for obtaining A1 Certificates will continue as normal until at least then. However, if the UK leaves the EU without a deal, the position is less certain. Whilst the Department for Work and Pensions has issued a draft legislation that broadly replicates the existing positions under Article 12 and 13 of the EU Regulations, this has not been agreed by other EU Member States. As a result, assignees and their employers could face a double charge as shown below:

Example 1

Mr Kane is seconded from the UK to France for 18 months. Under proposed UK rules, both the employee and the employer will pay UK social security throughout the secondment. However, as the French authorities have no legislative reason to accept the UK position, they may argue that social security is also due in France for the same period, creating a double charge. It is possible that the French authorities may instead turn to the old Reciprocal Agreements that were in place prior to the EU Regulations, however the UK/France agreement only allowed a posted worker to remain home country insured for a secondment of up to six months. As such, the French authorities may still determine that the old agreement cannot apply and that social security is payable in France, regardless of the position in the UK under domestic law.

Example 2

Mr Sterling takes on a role which means he will spend time working in three EU countries on a regular and frequent basis. His pattern of employment is expected be split evenly between the UK, Belgium and the Netherlands. He remains habitually resident in the UK. Under proposed UK rules, UK social security will be payable on 100% of his earnings as he performs a substantial part of his activities in the UK. However, as neither the Belgian nor the Dutch authorities have any reason to accept the UK position, they may determine that Belgian social security is due for the Belgian workdays and Dutch social security is due for the Dutch workdays in addition to payments made in the UK.

As a result of the uncertainty, recent guidance from HM Revenue and Customs (EU Exit Bulletin of April 2019) advises employers with A1 Certificates for employees that extend beyond 31st October 2019 to contact the relevant overseas authority to check whether or not they need to start paying in that country from 1st November 2019. This seems a fairly extraordinary undertaking for an employer, but there is at least one exception in the case of

UK/Ireland for which an international social security agreement was agreed and signed in February 2019.

We recommend that all employers review the start and end dates of all existing A1 Certificates to determine whether there is any risk of host country liabilities falling due from 1st November 2019 in the event of a no-deal Brexit. For those cases, it will be necessary to seek professional guidance well in advance of this date to determine the social security impacts and potential additional liabilities.

Richard Watts-Joyce
rwattsjoyce@gtn.uk

Contact

Austria
Karl Waser
karl.waser@icon.at
T +43 732 69412 74651
ICON Wirtschaftstreuhand GmbH
Stahlstraße 14
4020 Linz
www.icon.at

Belgium
Katrien Bollen
katrien.bollen@tiberghien.com
T +32 2 773 40 00
Tiberghien (Member of WTS)
Havenlaan 86c / 419
1000, Brussels
www.tiberghien.com/en

China
Martin Ng
martin.ng@wts.cn
Elena Chen
elena.chen@wts.cn
T +86 21 5047 8665
WTS China Co., Ltd.
Unit 031, 29F, Hang Seng Bank Tower
No.1000 Lujiazui Ring Road, Pudong New Area
200120, Shanghai
www.wts.cn

France
Laura Touitou
laura.touitou@villemot-wts.com
T +33 1 45 08 44 07
Villemot WTS
60 rue Pierre Charron
75008 Paris
www.villemot-wts.com

Germany
Frank Dissen
frank.dissen@wts.de
T +49 (0) 69 1338 456-52
WTS Steuerberatungsgesellschaft mbH
Taunusanlage 19
60325 Frankfurt am Main
www.wts.com/de/expatriates

Netherlands
Yvonne Bakker
yb@atlas.tax
T 020-2376245
Atlas Tax Lawyers
Weteringschans 24
1017SG Amsterdam
www.atlas.tax

Sweden
Michel Weimer
michel.weimer@svalner.se
T +46702501176
Svalner Skatt och Transaktion
Smålandsgatan 16
111 46 Stockholm
www.svalner.se

United Kingdom
Richard Watts-Joyce
rwattsjoyce@gtn.uk
T +44 (0) 207 100 2126
Global Tax Network Ltd
2nd Floor
13 Austin Friars
London EC2N 2HE
www.gtn.uk

wts global

About WTS Global

With a representation in over 100 countries, WTS Global is one of the leading global tax practices offering the full range of tax services without the constraints of a global audit firm. WTS Global deliberately refrains from conducting annual audits in order to avoid any conflicts of interest and to be the long-term trusted advisor for its international clients. Clients of WTS Global include multinational companies, international mid-size companies as well as private clients and family offices.

The exclusive member firms of WTS Global are carefully selected through stringent quality reviews. They are typically strong local players in their home market being united by the ambition of building the tax firm of the future. WTS Global effectively combines senior tax expertise from different cultures and backgrounds be it in-house, advisory, regulatory or digital.

For more information please visit **wts.com**

Imprint

WTS Global
P.O. Box 19201 | 3001 BE Rotterdam
Netherlands
T +31 (10) 217 91 71 | F +31 (10) 217 91 70
wts.com | info@wts.de

The above information is intended to provide general guidance with respect to the subject matter. This general guidance should not be relied on as a basis for undertaking any transaction or business decision, but rather the advice of a qualified tax consultant should be obtained based on a taxpayer's individual circumstances. Although our articles are carefully reviewed, we accept no responsibility in the event of any inaccuracy or omission. For further information please refer to the authors.