

INTERNATIONAL AND EUROPEAN TAX LAW

Tax Residence

CASE STUDY 1

A is a famous singer of UK nationality, who receives payments for record sales from all over Europe. He lives permanently in France with his wife and child and travels to the UK only for concerts and recordings. On April 20th, 2024, A splits up with his wife and moves permanently with his new girlfriend to Italy.

A requests your professional advice about which country he should declare his income to.

CASE STUDY 2

A, a German company, has established subsidiary B in the UK. In order to ensure a coherent business policy, A has appointed its Legal Counsel, its CFO (Chief Financial Officer) and its Chief Accountant as directors of B. Given that all three aforementioned persons reside permanently and work in Germany, they request for convenience reasons that at least some of B's Board Meetings be held in Germany. However, the company's tax consultant insists that all Board Meetings should be held in the UK, without exception. He even demands that the German Board Members keep all flight tickets to the UK as well as all pertinent hotel accommodation receipts.

Do you agree with the tax consultant's opinion?