SG Audit

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Amendment of the Double Tax Treaty between France and Luxembourg

The French and Luxembourg governments have signed an amendment to the Double Tax Treaty currently in force between France and Luxembourg.

The amendment provides that the capital gain realized on the sale of shares or interest in a company, or any other entity, whose real estate assets, directly or indirectly, represent more than 50% of its total assets, shall be taxable in the country where these real estate assets are located.

The effective taxation of such capital gain in the country where these real estate assets are located shall not intervene before 1st January 2015, without any retroactive effect.

Should you need any further information on the above, please do not hesitate to contact:

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