

Insights

DELAY TO LUXEMBOURG-UK TREATY CHANGES UNTIL 2024 AT THE EARLIEST

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SUMMARY

The changes to the Luxembourg-UK treaty will not be effective until 2024 at the earliest because Luxembourg did not ratify the treaty changes in 2022. The delay was expected, as trailed in our earlier [blog](#), where we explore the impact on the UK real estate sector.

The delay means that, subject to the conditions of the existing treaty being met, certain Luxembourg investors should continue to be able to sell UK property rich entities without incurring UK tax on chargeable gains until April 2024 at the earliest.

Thanks to Johan Leonard at Stibbe for confirming Luxembourg did not ratify the treaty changes in 2022.

If you have any questions, please contact [Elizabeth Bradley](#) at BCLP, or [Johan Leonard](#) at Stibbe.

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