

Motivation

This thesis is motivated by individuals' increasing wish for tax compliance and the demands of tax compliant clients in the financial industry. This demand does not derive from the financial industry itself, but rather from Organisation for Economic Co-operation and Development's (OECD) increased campaign against tax evasion and the acquisition of "tax-CDs" of various countries. This has led many to the opinion that only tax compliant clients are sustainable.

In order to streamline the process individuals to become tax compliant, various countries have offered disclosure opportunities or negotiated tax cooperation agreements. This thesis covers two of these tax agreements, the Liechtenstein Disclosure Facility and the Swiss-UK tax agreement. The key question in this work concerns the tax implications Liechtenstein's disclosure approach and Switzerland's withholding approach with the United Kingdom.

Several researchers have already dealt with this issue, but superficiality is a common feature due to limited space in journals. There are currently no comprehensive papers covering these two agreements. This thesis aims to close this gap and analyse the agreements in detail, in addition to making a contribution to academic tax research.

Structure

The thesis begins with some preliminary remarks, which include overviews of the research question, motivation, overall structure and definitions of the most important terms in the context of the specified tax agreements. Chapter one contains an overview of the recent developments and reasons which led to these agreements. An overview of the functionality of tax havens will be given, and the role of Liechtenstein, Switzerland and the United Kingdom will be investigated.

Chapter two begins with a short overview of the national taxation of citizens in the United Kingdom with assets abroad, which allows for a systematic analysis of the tax agreement between the United Kingdom and Liechtenstein. The LDF analysis is based on the memorandum of understanding and three joint declarations between the Government of Liechtenstein and HM Revenue & Customs.

Chapter three analyses the tax agreement between the United Kingdom and Switzerland, with a focus on its comparison with the LDF. The analysis of the Swiss-UK tax agreement is based on two Swiss-UK protocols, an agreement, a joint declaration, a declaration, minutes and a note. The analysis of both agreements provides the legal provisions, and describes and analyses their impact. In addition, other tax agreements, such as the Swiss-German and Swiss-Austrian tax agreements, will be used to achieve a better insight. This analysis of tax law is followed by a tax calculation of three cases for each