

untary disclosure for the one-off deduction, but with additional information regarding the total amount of income and gains.⁴¹⁰ In general, interest income, other income and capital are assessed based on the amount before deductions.⁴¹¹ Gains from disposal of assets comprise the gain less acquisition and incidental costs.⁴¹² Losses due to a disposal of assets can be offset against capital gains on future assets with the same agent.⁴¹³

Choosing the one-off deduction to regularise past taxation does not prevent relevant persons from choosing voluntary disclosure for future taxation, and *vice versa*.

3.4.4.3 Handling of Income

Interest income is interest credited to an account that relates to any debt-claims.⁴¹⁴ Additionally, any interest income which falls under Council Directive 2003/48/EC (taxation on savings income), is seen as interest income.⁴¹⁵ If a Swiss paying agent has no information about the interest proportion of an income, the whole income is seen as interest.⁴¹⁶ Dividend income includes dividends credited on an account.⁴¹⁷ Other income is a substitute payment for dividends or interest (e.g. interest through structured instruments, swaps, securities lending, and repo business).⁴¹⁸ All gains due to disposal of assets are capital gains.⁴¹⁹

Segregation describes the treatment of investments that have part interest income and part dividends or capital gains (without the possibility of segregation) as interest income. The procedure is similar to the Savings Directive and the handling of indefinable mixed funds under Liechtenstein tax law.

3.4.4.4 Process

Swiss paying agents have to collect the withholding tax when the income or gain is credited and must send the tax, in sterling, to the Swiss tax authority within two months.⁴²⁰ The Swiss tax authority must

⁴¹⁰ CH-UK Tax Agreement, 2011, art. 22, para. 3.

⁴¹¹ CH-UK Tax Agreement, 2011, art. 24, para. 1-4.

⁴¹² CH-UK Tax Agreement, 2011, art. 24, para. 5.

⁴¹³ CH-UK Tax Agreement, 2011, art. 24, para. 6.

⁴¹⁴ CH-UK Tax Agreement, 2011, art. 25, para. 1, letter a.

⁴¹⁵ CH-UK Tax Agreement, 2011, art. 25, para. 1, letter c.

⁴¹⁶ CH-UK Tax Agreement, 2011, art. 25, para. 2.

⁴¹⁷ CH-UK Tax Agreement, 2011, art. 26.

⁴¹⁸ CH-UK Tax Agreement, 2011, art. 27.

⁴¹⁹ CH-UK Tax Agreement, 2011, art. 28.

⁴²⁰ CH-UK Tax Agreement, 2011, art. 29 para. 1 & 2.