



SCENARIO 1 OF 4

Scenario 1: remain UK resident

The baseline the relocation scenarios are priced against.

WHAT THIS MEANS

Staying put sets the reference numbers. Income tax reaches 45% above £125,140. Gains made from 6 April 2026 are charged at 18% within the basic income tax band and 24% above it, so most of a £600,000 gain sits at 24%. Dividends above the £500 allowance are taxed at 10.75%, 35.75% or 39.35% by band. These are headline statutory rates on the disclosed facts; nothing in this scenario depends on an unverified condition.

45%

additional rate of income tax, above £125,140

18/24%

capital gains by band, from 6 April 2026

39.35%

additional-rate dividend tax

£500

dividend allowance

THE FINDINGS — OPEN ANY LINE FOR THE CLAIM, ITS CONDITIONS AND ITS SOURCE

Income tax: the additional rate is 45%, above £125,140

VALIDATED FACT

[GB-RATES-F32E44:v1]

The additional rate of income tax is 45%, on taxable income above £125,140. Dividend income is taxed under its own rate table, set out below.

🔗 SOURCE PASSAGE

Additional rate: over £125,140: 45%

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

Income Tax rates and Personal Allowances, rate table, additional-rate row

DOCUMENT

Rates page current for the tax year, as published on GOV.UK

RETRIEVED

1 September 2026

SOURCE

<https://www.gov.uk/income-tax-rates>

Capital gains on the exit shares: 18% and 24% by band, from 6 April 2026

VALIDATED FACT [GB-CAPITAL_GA-084008:v1]

Chargeable gains are stacked on top of taxable income to find the band. The portion within the basic income tax band is charged at 18%, and the portion above it at 24%, for gains made from 6 April 2026. Each rate is held as its own fact version, and both carry that effective date.

COMPANION FACT VERSIONS [GB-CAPITAL_GA-86F41C:v1]

🔗 SOURCE PASSAGE

If this amount is within the basic Income Tax band, you'll pay 18% on your gains made from 6 April 2026 [...] For any amount above the basic Income Tax band, you'll pay 24% on gains made from 6 April 2026

PUBLISHER	PROVISION
HM Revenue & Customs, GOV.UK	Capital Gains Tax rates, gains made from 6 April 2026
DOCUMENT	RETRIEVED
Rates stated as effective for gains made from 6 April 2026	1 September 2026
SOURCE	
https://www.gov.uk/capital-gains-tax/rates	

Dividends: 10.75%, 35.75% and 39.35% by band, above a £500 allowance

VALIDATED FACT

[GB-DIVIDENDS-9EB835:v1]

Dividend income above the £500 dividend allowance is taxed at 10.75% in the basic band, 35.75% in the higher band and 39.35% in the additional band. These are the rates following the Autumn 2025 Budget; each band's rate and the allowance are held as separate fact versions.

COMPANION FACT VERSIONS

[GB-DIVIDENDS-CD6EE1:v1]

[GB-DIVIDENDS-FE7031:v1]

[GB-DIVIDENDS-94B8B6:v1]

SOURCE PASSAGE

How much tax you pay — Tax band: Basic rate; Tax rate on dividends over the allowance: 10.75% [...] Tax band: Higher rate; Tax rate on dividends over the allowance: 35.75% [...] Tax band: Additional rate; Tax rate on dividends over the allowance: 39.35% [...] You also get a dividend allowance of £500 each year. You only pay tax on any dividend income above the dividend allowance.

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

Tax on dividends: dividend allowance and rate table by income tax band

DOCUMENT

Rates following the Autumn 2025 Budget

RETRIEVED

21 August 2026

SOURCE

<https://www.gov.uk/tax-on-dividends>

The disposal dates decide which rate table applies

DERIVED

[DF-2c418a9b]

The 18% and 24% rates are stated as effective for gains made from 6 April 2026. Disposals earlier in the year fall under the rates then in force, which this report does not restate. The adviser prices each of the exit disposals against its date.

HOW THIS LINE EARNED ITS PLACE

Derived from the profile and the effective date the cited fact versions carry. No liability is computed in this sample.



SCENARIO 2 OF 4

Scenario 2: relocate, keep the UK property

The exposures that remain after UK residence ends.

WHAT THIS MEANS

Leaving does not detach everything. An interest in UK residential property stays within the UK capital gains tax charge after residence ends, so a later sale of the rental property is still a UK tax event. Inheritance tax at 40% above the £325,000 threshold and the 7-year gift rule shape the estate whichever destination is chosen. The regime that replaced non-dom treatment matters only if a later return to the UK is contemplated.

In scope

UK property CGT, after residence ends

40%

inheritance tax above £325,000

7 years

the gift rule's survival period

6 Apr 2025

the non-dom regime ended

THE FINDINGS — OPEN ANY LINE FOR THE CLAIM, ITS CONDITIONS AND ITS SOURCE

UK residential property stays within UK capital gains tax after departure

VALIDATED FACT

[GB-EXIT-001:v5]

An interest in UK residential property remains within the scope of the UK capital gains tax charge when a person ceases to be UK resident. Selling the rental property after the move does not take the gain out of UK tax.

🔗 SOURCE PASSAGE

Certain assets — including an interest in UK residential property — remain within the scope of the UK CGT charge when a person ceases to be UK resident

PUBLISHER

HM Revenue & Customs

PROVISION

Capital Gains Manual, CG13400

DOCUMENT

HMRC internal manual, as published on GOV.UK

RETRIEVED

1 September 2026

SOURCE

<https://www.gov.uk/hmrc-internal-manuals/capital-gains-manual/cg13400>

Inheritance tax: 40% above the £325,000 threshold

VALIDATED FACT

[GB-INHERITANCE-010:v2]

The standard rate of inheritance tax is 40%. It is charged only on the part of the estate above the threshold, and the standard threshold is £325,000. How far the estate remains exposed after relocation is scoped with the UK adviser.

🔗 SOURCE PASSAGE

The standard Inheritance Tax rate is 40%. It's only charged on the part of your estate that's above the threshold.

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

How Inheritance Tax works: thresholds, rules and allowances

DOCUMENT

Guidance page current as at the retrieval date

RETRIEVED

1 September 2026

SOURCE

<https://www.gov.uk/inheritance-tax>

Gifts made within 7 years of death come back into charge

VALIDATED FACT

[GB-INH-008:v1]

No inheritance tax is due on a gift where the giver survives it by 7 years, outside trusts. Gifts made within the 7 years before death are brought back into account, so the timing of any pre-departure gifts matters for 7 years after each one.

🔗 SOURCE PASSAGE

No tax is due on any gifts you give if you live for 7 years after giving them - unless the gift is part of a trust. This is known as the 7 year rule.

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

How Inheritance Tax works: rules on giving gifts

DOCUMENT

Guidance page current as at the retrieval date

RETRIEVED

1 September 2026

SOURCE

<https://www.gov.uk/inheritance-tax/gifts>

The rules for non-domiciled residents ended on 6 April 2025. UK planning built on non-dom status no longer applies, in either direction of travel.

🔗 SOURCE PASSAGE

Before 6 April 2025, UK residents who had their permanent home ('domicile') outside the UK did not have to pay UK tax on foreign income.

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

Tax on foreign income: non-domiciled residents, end of the regime

DOCUMENT

Guidance page current as at the retrieval date

RETRIEVED

21 August 2026

SOURCE

<https://www.gov.uk/tax-foreign-income/non-domiciled-residents>

A foreign income and gains relief exists for new UK arrivals

The regime that replaced non-dom treatment provides relief on foreign income and gains for qualifying new arrivals. It is relevant to this profile only if a later return to the UK is contemplated; its conditions and duration are checked with the adviser at that point.

🔗 SOURCE PASSAGE

UK residents may not have to pay UK tax on foreign income if they're eligible for Foreign Income and Gains relief.

PUBLISHER

HM Revenue & Customs, GOV.UK

PROVISION

Tax on foreign income: relief on foreign income and gains for qualifying new residents

DOCUMENT

Guidance page current as at the retrieval date

RETRIEVED

21 August 2026

SOURCE

<https://www.gov.uk/tax-foreign-income/non-domiciled-residents>

What follows this profile after departure

DERIVED

[DF-8b52e6c1]

On the disclosed facts, two exposures stay attached after residence ends: the rental property's gain, which remains within UK capital gains tax on a future disposal, and the estate's inheritance tax position, which the UK adviser scopes before any move is priced.

HOW THIS LINE EARNED ITS PLACE

Derived from GB-EXIT-001:v5 and the inheritance tax facts, applied to the disclosed profile. The estate analysis itself is out of scope for this sample.



SCENARIO 3 OF 4

Scenario 3: relocate to Cyprus

Non-dom treatment and the securities-gains exemption.

WHAT THIS MEANS

Special Defence Contribution reaches only residents who are also domiciled in Cyprus, so a non-dom pays none of it on dividends or interest until domicile is deemed after 17 of the last 20 years. Gains on shares and bonds are exempt from income tax, which matters for any further disposals from the retained holdings. General Healthcare System contributions are a separate charge at 2.65%, capped at €180,000 of annual income. The corporate rate is 15% from 1 January 2026 if a Cyprus company enters the picture. None of the eligibility conditions is established by the disclosed profile, and scenario 2's UK exposures apply in full.

0% SDC

on dividends and interest as a non-dom

2.65%

health-system contribution, capped at €180,000

0%

income tax on gains from shares and bonds

15%

corporate rate, from 1 January 2026

THE FINDINGS — OPEN ANY LINE FOR THE CLAIM, ITS CONDITIONS AND ITS SOURCE

Special Defence Contribution reaches only individuals who are both Cyprus tax resident and domiciled in Cyprus, so a non-domiciled resident pays no SDC on dividends or interest. Domicile is deemed acquired after residence in Cyprus in 17 of the last 20 years. The exemption covers SDC alone; General Healthcare System contributions are a separate charge, set out below.

NON-DOM STATUS: CONDITIONS TO VERIFY

- Domicile of origin outside Cyprus, and not deemed domiciled by residence in 17 of the last 20 years. The profile discloses no domicile history.
- Cyprus tax residence established in the relevant year

Open conditions are established by the adviser before the relief is priced into any decision.

🔗 SOURCE PASSAGE

«κάτοικος της Δημοκρατίας», όταν ο όρος αυτός εφαρμόζεται στην περίπτωση ατόμου, σημαίνει άτομο που είναι κάτοικος της Δημοκρατίας, όπως ορίζεται από τις διατάξεις του περί Φορολογίας του Εισοδήματος Νόμου, το οποίο επιπλέον έχει κατοικία (domicile) στη Δημοκρατία·

ENGLISH 'resident of the Republic', when this term is applied in the case of an individual, means an individual who is a resident of the Republic as defined by the provisions of the Income Tax Law, who in addition has domicile in the Republic.

PUBLISHER

Παγκύπριος Δικηγορικός Σύλλογος (Cyprus Bar Association), CyLaw consolidated statute

PROVISION

Special Defence Contribution Law 117(I)/2002, art. 2, definition of «κάτοικος της Δημοκρατίας»

DOCUMENT

Consolidation reflecting N. 245(I)/2025

RETRIEVED

1 September 2026

SOURCE

http://www.cylaw.org/nomoi/enop/non-ind/2002_1_117/full.html

General Healthcare System contributions: 2.65%, on income up to €180,000

VALIDATED FACT

[CY-SOCIAL_S-32410721:v1]

General Healthcare System contributions are charged at 2.65% for an employee, and the maximum annual income on which contributions are payable is €180,000. The charge is separate from income tax and from the Special Defence Contribution, and non-dom status does not remove it. Which of this profile's income categories it reaches after relocation is confirmed with the Cyprus adviser.

COMPANION FACT VERSIONS

[CY-SOCIAL_S-c202b71b:v1]

99 SOURCE PASSAGE

Πλήρης εφαρμογή (Από 1/3/2020): 2,65% ... επί του εισοδήματός του. Το μέγιστο συνολικό ετήσιο ποσό για κάθε φυσικό πρόσωπο πάνω στο οποίο καταβάλλονται εισφορές, είναι το ποσό των €180.000.

ENGLISH Full implementation (from 1/3/2020): 2.65% ... on his income. The maximum total annual amount per natural person on which contributions are payable is €180,000.

PUBLISHER

Οργανισμός Ασφάλισης Υγείας (Health Insurance Organisation), General Healthcare System

PROVISION

GHS contribution rates and the annual contribution cap

DOCUMENT

The page carries no last-updated date; its substance was checked against the Cyprus Tax Department's live compliance calendar.

RETRIEVED

1 September 2026

SOURCE

<https://www.gesy.org.cy/el-gr/hiofinancing>

Profit from the disposal of securities is exempt from income tax. Capital gains tax at 20% reaches Cyprus-situated immovable property and shares deriving value from it: from 1 January 2026 the indirect-holding threshold fell from 50% to 20% of market value.

§§ SOURCE PASSAGE

(22) κέρδος από τη διάθεση τίτλων. [...] «τίτλοι» σημαίνει μετοχές, χρεόγραφα, ομολογίες, ιδρυτικοί και άλλοι τίτλοι εταιρειών ή άλλων νομικών προσώπων, που έχουν κατά νόμο συσταθεί στη Δημοκρατία ή την αλλοδαπή και δικαιώματα επ' αυτών·

ENGLISH (22) [exempt from tax:] profit from the disposal of securities. [...] 'securities' means shares, debentures, bonds, founders' and other securities of companies or other legal persons duly incorporated in the Republic or abroad, and rights thereon.

PUBLISHER

Παγκύπριος Δικηγορικός Σύλλογος (Cyprus Bar Association), CyLaw consolidated statute

PROVISION

Income Tax Law 118(I)/2002, art. 8(22), with the definition of «τίτλοι» in art. 2

DOCUMENT

Consolidation current through N. 67(I)/2026

RETRIEVED

1 September 2026

SOURCE

http://www.cylaw.org/nomoi/enop/non-ind/2002_1_118/full.html

The Cyprus corporate income tax rate is 15%, applying from 1 January 2026. It was 12.5% until then. It matters here only if the client forms or redomiciles a company in Cyprus, which the profile does not disclose.

99 SOURCE PASSAGE

2. Οι Εταιρείες, υπόκεινται σε εταιρικό φόρο με συντελεστή δεκαπέντε τοις εκατόν (15%) για κάθε ευρώ φορολογητέου εισοδήματος.

ENGLISH 2. Companies are subject to corporate tax at a rate of fifteen per cent (15%) for each euro of taxable income.

PUBLISHER

Παγκύπριος Δικηγορικός Σύλλογος (Cyprus Bar Association), CyLaw consolidated statute

PROVISION

Income Tax Law 118(I)/2002, Second Schedule para. 2, as amended by N. 244(I)/2025

DOCUMENT

Consolidation current through N. 67(I)/2026. The Cyprus Tax Department's presentation of N. 244(I)/2025 states it enters into force from 1/1/2026.

RETRIEVED

1 September 2026

SOURCE

http://www.cylaw.org/nomoi/enop/non-ind/2002_1_118/full.html

50% income-tax exemption for new residents

⚠️ CONDITIONS TO VERIFY

VALIDATED FACT

[CY-50PCT-EXEMPTION:v1]

A new resident taking first Cyprus employment with remuneration above €55,000 receives a 50% exemption from income tax on that employment income for 17 tax years, subject to prior non-residence of at least 15 consecutive years. It is granted once in a lifetime and cannot be combined with the other employment exemptions in art. 8.

FIRST-EMPLOYMENT EXEMPTION: CONDITIONS TO VERIFY

- A first employment is taken up in Cyprus. The profile discloses no Cyprus employment.
- Remuneration from that employment exceeds €55,000
- Not resident in Cyprus for at least 15 consecutive years beforehand
- The exemption has not been used before. It is available once in a lifetime.

Open conditions are established by the adviser before the relief is priced into any decision.

🔗 SOURCE PASSAGE

(23A) το πενήντα τοις εκατόν (50%) της αμοιβής από εργοδότηση στη Δημοκρατία από άτομο το οποίο δεν ήταν κάτοικος της Δημοκρατίας για χρονική περίοδο τουλάχιστον δεκαπέντε (15) συνεχόμενων ετών αμέσως πριν από την έναρξη της πρώτης εργοδότησής του στη Δημοκρατία [...] (i) η απαλλαγή χορηγείται για χρονική περίοδο δεκαεπτά (17) φορολογικών ετών [...] (ii) η απαλλαγή χορηγείται για οποιοδήποτε έτος στο οποίο η αμοιβή από εργοδότηση στη Δημοκρατία υπερβαίνει τις πενήντα πέντε χιλιάδες ευρώ (55.000)

ENGLISH (23A) fifty per cent (50%) of the remuneration from employment in the Republic by an individual who was not a resident of the Republic for a period of at least fifteen (15) consecutive years immediately before the commencement of his first employment in the Republic [...] (i) the exemption is granted for a period of seventeen (17) tax years [...] (ii) the exemption is granted for any year in which the remuneration from employment in the Republic exceeds fifty-five thousand euro (€55,000).

PUBLISHER

Παγκύπριος Δικηγορικός Σύλλογος (Cyprus Bar Association), CyLaw consolidated statute

PROVISION

Income Tax Law 118(I)/2002, art. 8(23A)

DOCUMENT

Consolidation current through N. 67(I)/2026

RETRIEVED

1 September 2026

SOURCE

http://www.cylaw.org/nomoi/enop/non-ind/2002_1_118/full.html

Assessment: Cyprus warrants a full calculation. Confirm non-dom status against the deemed-domicile rule, then price the package next to the UK exposures in scenario 2.



Scenario 4: relocate to Portugal

The IFICI 20% rate and the foreign-income exemption.

WHAT THIS MEANS

IFICI taxes qualifying category A and B income obtained in Portugal at 20% for ten years, and most foreign-source income is exempt while the regime holds. The demanding condition is the entity gateway: the activity has to sit in a Portugal-anchored employer or company, and the profile discloses none yet. Outside the exemption, dividends run at 28% and securities gains at 28%, with aggregation at general rates mandatory for holdings under 365 days where total income reaches the 48% top bracket.

20%

IFICI rate on qualifying income, for 10 years

Exempt

most foreign-source income under IFICI

28%

gains and dividends outside the exemption

48%

top IRS rate where aggregation is mandatory

THE FINDINGS — OPEN ANY LINE FOR THE CLAIM, ITS CONDITIONS AND ITS SOURCE

IFICI: a special 20% rate for qualifying roles

⚠️ CONDITIONS TO VERIFY

VALIDATED FACT

[PT-IFICI-RATE:v1]

Under IFICI, net category A and B income obtained in Portugal from eligible activities is taxed at a special rate of 20% for ten consecutive years from the year of registration as a resident.

IFICI ACCESS CONDITIONS: CONDITIONS TO VERIFY

- Becomes tax resident in Portugal in the year the regime is to start
- Not resident in Portugal in any of the five immediately preceding years; see PT-SPECIAL_RE-OAD4A5:v1 below
- The activity falls within art. 58.º-A n.º 1 and is exercised in an eligible Portugal-anchored entity. The profile discloses no Portuguese employer or company.
- Holds the qualification level the regime requires, or the evidenced professional-experience alternative
- Has not used the non-habitual resident regime or IFICI before, and registers by 15 January of the year after becoming resident

Open conditions are established by the adviser before the relief is priced into any decision.

 **SOURCE PASSAGE**

Este regime consagra, designadamente, a tributação à taxa especial de 20%, dos rendimentos do trabalho (rendimentos líquidos das categorias A e B) obtidos em Portugal, no âmbito das atividades consideradas elegíveis, durante um período de 10 anos consecutivos, a partir do ano da inscrição como residente em território português, sem prejuízo da opção pelo englobamento.

ENGLISH This regime provides, in particular, for taxation at the special rate of 20% of employment income (net category A and B income) obtained in Portugal, within the activities considered eligible, for a period of 10 consecutive years from the year of registration as a resident in Portuguese territory, without prejudice to the option to aggregate.

PUBLISHER Autoridade Tributária e Aduaneira (Portuguese Tax and Customs Authority)	PROVISION Informative leaflet, IFICI — Incentivo Fiscal à Investigação Científica e Inovação, on art. 58.º-A of the Estatuto dos Benefícios Fiscais
DOCUMENT Published by the AT in its contributor-support library	RETRIEVED 1 September 2026
SOURCE https://info.portaldasfinancas.gov.pt/pt/apoio_contribuinte/Folhetos_informativos/Documents/incen-tivos_investigacao.pdf	

Eligibility requires that the individual was not resident in Portugal in any of the five years preceding the year of becoming resident. Nothing in the profile discloses prior Portuguese residence, and nothing establishes its absence either; the condition is verified with the adviser.

🔗 SOURCE PASSAGE

Beneficiam do regime de incentivo fiscal à investigação científica e inovação os sujeitos passivos que, tornando-se fiscalmente residentes nos termos dos n.os 1 e 2 do artigo 16.º do Código do IRS, não tenham sido residentes em território português em qualquer dos cinco anos anteriores e que exerçam atividades que se enquadrem em: a) Docência no ensino superior e investigação científica [...]

ENGLISH The tax incentive regime for scientific research and innovation benefits taxpayers who, becoming tax resident under paragraphs 1 and 2 of article 16 of the IRS Code, have not been resident in Portuguese territory in any of the five preceding years and who carry on activities falling within: (a) teaching in higher education and scientific research [...]

PUBLISHER

Autoridade Tributária e Aduaneira — Estatuto dos Benefícios Fiscais (EBF), consolidated text

PROVISION

EBF art. 58.º-A n.º 1, prior non-residence condition

DOCUMENT

Consolidated text as published by the AT

RETRIEVED

19 August 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/bf_rep/Pages/EBF58A.aspx

Under IFICI, most foreign-source income is exempt

VALIDATED FACT

[PT-IFICI-FOREIGN-EXEMPT:v1]

For the ten-year IFICI period, most categories of foreign-source income are exempt from IRS; income paid from a listed low-tax jurisdiction is the exception, taxed at 35%. For this profile, the exemption is what would govern dividends from the retained UK holdings while the regime holds.

🔗 SOURCE PASSAGE

isenção sobre rendimentos das categorias E, F e G... obtidos no estrangeiro

ENGLISH exemption on income of categories E, F and G... obtained abroad

PUBLISHER

Autoridade Tributária e Aduaneira — Estatuto dos Benefícios Fiscais (EBF), consolidated text

PROVISION

EBF art. 58.º-A n.os 10 to 12, foreign-source income

DOCUMENT

Consolidated text as published by the AT

RETRIEVED

14 August 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/bf_rep/Pages/EBF58A.aspx

The positive balance of gains and losses on securities is taxed at an autonomous rate of 28%. Where the assets were held for less than 365 days and total taxable income, including that balance, reaches the top bracket of art. 68.º, aggregation at general IRS rates is mandatory.

99 SOURCE PASSAGE

Não obstante o disposto na alínea c) do n.º 1, o saldo entre as mais-valias e menos-valias, resultante das operações previstas na alínea b) do n.º 1 do artigo 10.º, incluindo os rendimentos referidos nas alíneas b) e c) do n.º 18, são obrigatoriamente englobados quando resultem de ativos detidos por um período inferior a 365 dias e o sujeito passivo tenha um rendimento coletável, incluindo este saldo, igual ou superior ao valor do último escalão do n.º 1 do artigo 68.º

ENGLISH Notwithstanding subparagraph (c) of paragraph 1, the balance between gains and losses resulting from the operations provided for in subparagraph (b) of paragraph 1 of article 10, including the income referred to in subparagraphs (b) and (c) of paragraph 18, must be aggregated where it results from assets held for a period of less than 365 days and the taxpayer has taxable income, including that balance, equal to or above the value of the top bracket of paragraph 1 of article 68.

PUBLISHER

Autoridade Tributária e Aduaneira — Código do IRS (CIRS), consolidated text

PROVISION

CIRS art. 72.º n.º 14

DOCUMENT

Consolidated text as at 1 September 2026, last amended by Lei n.º 73-A/2025 of 30 December

RETRIEVED

1 September 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/cirs_rep/Pages/irs72.aspx

Dividend income of a resident individual is taxed at 28%, unless the taxpayer elects aggregation at general rates. How this sits alongside the IFICI foreign-income exemption for the retained holdings is settled with the Portugal adviser.

🔗 SOURCE PASSAGE

taxa liberatória de 28%

ENGLISH final withholding rate of 28%

PUBLISHER

Autoridade Tributária e Aduaneira — Código do IRS (CIRS), consolidated text

PROVISION

CIRS art. 71.º, the 28% withholding rate on capital income

DOCUMENT

Consolidated text as at the retrieval date

RETRIEVED

14 August 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/cirs_rep/Pages/irs71.aspx

The top bracket of the general IRS rates table applies a marginal rate of 48% to taxable income above €86,634. An additional solidarity rate under art. 68.º-A adds 2.5% above €80,000 and 5% above €250,000.

🔗 SOURCE PASSAGE

Superior a 86 634 — 48,00

ENGLISH Above 86,634 — 48.00 [per cent]

PUBLISHER

Autoridade Tributária e Aduaneira — Código do IRS (CIRS), consolidated text

PROVISION

CIRS art. 68.º n.º 1, top bracket

DOCUMENT

Consolidated text as at 1 September 2026, last amended by Lei n.º 73-A/2025 of 30 December

RETRIEVED

1 September 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/cirs_rep/Pages/irs68.aspx

Home-sale gains excluded if the proceeds are reinvested

⚠️ CONDITIONS TO VERIFY

VALIDATED FACT

[PT-RE-REINVEST:v1]

Gains on the sale of a property used as the taxpayer's own permanent residence are excluded from tax where the proceeds, net of any acquisition loan, are reinvested in another permanent residence in Portugal, the EU or the EEA, between 24 months before and 36 months after the sale, and the intention is declared in the return for the year of sale.

HOME-SALE REINVESTMENT TEST: CONDITIONS TO VERIFY

- A sale of a home used as the taxpayer's own permanent residence. The disclosed UK property is let, and a let property does not meet that condition.
- Proceeds, net of any acquisition loan, are reinvested in a permanent residence in Portugal, the EU or the EEA within the window
- The intention to reinvest, and the amount, are declared in the return for the year of sale

Open conditions are established by the adviser before the relief is priced into any decision.

🔗 SOURCE PASSAGE

São excluídos da tributação os ganhos provenientes da transmissão onerosa de imóveis destinados a habitação própria e permanente do sujeito passivo ou do seu agregado familiar, desde que verificadas, cumulativamente, as seguintes condições: [...] b) O reinvestimento previsto na alínea anterior seja efetuado entre os 24 meses anteriores e os 36 meses posteriores contados da data da realização; c) O sujeito passivo manifeste a intenção de proceder ao reinvestimento, ainda que parcial, mencionando o respetivo montante na declaração de rendimentos respeitante ao ano da alienação;

ENGLISH Gains from the onerous transfer of property intended as the taxpayer's or the household's own permanent residence are excluded from taxation, provided the following conditions are cumulatively met: [...] (b) the reinvestment provided for in the preceding subparagraph is made between 24 months before and 36 months after the date of realisation; (c) the taxpayer declares the intention to reinvest, even partially, stating the amount in the income tax return for the year of the disposal.

PUBLISHER

Autoridade Tributária e Aduaneira — Código do IRS (CIRS), consolidated text

PROVISION

CIRS art. 10.º n.º 5

DOCUMENT

Consolidated text as at 1 September 2026

RETRIEVED

1 September 2026

SOURCE

https://info.portaldasfinancas.gov.pt/pt/informacao_fiscal/codigos_tributarios/cirs_rep/Pages/irs10.aspx

Assessment: Portugal warrants a full calculation once the IFICI entity question is settled. On the disclosed profile it is open, not established.



Assumptions, and what this does not answer

Naming what is assumed and what is excluded is part of the deliverable. Each item here is a question for the adviser.

ASSUMPTIONS

- The profile above is complete and accurate. Nothing has been assumed beyond it.
- Rates and thresholds are those the cited fact versions carry as of 1 September 2026, including the UK capital gains rates that take effect from 6 April 2026.
- In the relocation scenarios, UK tax residence is assumed to end cleanly. The timing analysis sits with the adviser; see out of scope.
- No double-tax treaty relief has been modelled. UK–Cyprus and UK–Portugal treaty positions are not analysed.
- No figures are quantified. There is no computation of liability under any scenario, in any currency.

OUTSIDE THE SCOPE OF THIS REPORT

- UK statutory residence timing: the statutory residence test, split-year treatment and the date residence ends. The report assumes a clean break and flags the timing for the adviser.
- Treaty analysis: the UK–Cyprus and UK–Portugal double-tax treaties, including tie-breakers and relief on the retained property's income.
- Pensions: UK pension savings, transfers, and their treatment in either destination.
- Social security: UK National Insurance, Cyprus and Portugal contributions, and any coordination between them.
- Immigration and the right to reside in either destination.
- Corporate structuring: residence, management and control, and permanent establishment for anything the client retains or forms.
- Anti-avoidance provisions in the three jurisdictions, including the UK temporary non-residence rules.
- Quantification: no scenario is modelled in money.



No person qualified in UK, Cypriot or Portuguese tax law has reviewed this sample. In a delivered engagement, the firm's reviewer inspects and refines the draft in the console; a refined draft is a new version the firm shares.

getax provides decision support and does not provide licensed tax advice. A tax adviser qualified in each jurisdiction must review every conclusion before it is relied on.

PRINTED ON THE REPORT'S LAST LINE

Report R-58c21f7a · factuality gate: 22/22 claims supported.

THE 22 CLAIMS, COUNTED

SECTION	FACTS	DERIVED
Scenario 1 · Remain in the UK	3	1
Scenario 2 · What the UK keeps	5	1
Scenario 3 · Relocate to Cyprus	5	0
Scenario 4 · Relocate to Portugal	7	0
Total		20 + 2 = 22

The check runs on every draft. Every factual sentence must bind to a validated fact version in the fact base; a sentence that cannot is flagged to the firm's reviewer, and the last line states how many were supported.

Rates and thresholds go stale at 90 days. A stale load-bearing fact is withheld, and the report says so instead of citing it.

The inventory above is countable. Open any finding in the scenarios to see the fact version and the source behind it.