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TAXES AT DEATH FOR OWNERS OF FAMILY BUSINESSES: COMPARISONS BETWEEN 15 OECD COUNTRIES.

November 10, 2021

Effective tax rates on inter-generation transfer of family businesses

Effective tax rate (%)	Country	Notes*	Population (M)
27	Canada	On deemed capital gains at time of death	38
20	United Kingdom	If >50% of votes in publicly-listed company	67
15	Denmark	Prior government had announced 5% rate	6
5.6	France	Owners and heirs must sign agreement and maintain ownership for a few years	67
4	Italy		60
3.4	Netherlands	Heirs must maintain ownership for 5 years	18
0 to 8.6	Germany	Up to €100M inheritance per heir if more than one heir. Or if before inheriting, heir does not have enough assets to pay tax	83
0 to 3.5	Switzerland	Depending on canton	6
0	United Kingdom	If private company	67
0	Australia		26
0	Czech Rep		11
0	Sweden		10
0	Portugal		10
0	Austria		9
0	Norway		5
0	New Zealand		5

* More populous countries tend to have more conditions and more complex rules.
Less populous countries have simpler rules and lower rates.

Effective tax rate in Canada is highest, and way above average or median, of 14 other OECD countries.

Note: countries are ranked by tax rate, and then by population size.

Key conclusion on taxes at death

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Our historical motherlands France and England,
and many other key and dynamic OECD* countries,
support perennity in their family-owned business ecosystems
with no or very low estate or inheritance taxes**.

Unlike Canada and Québec that have a 27% tax
on « deemed capital gains » at death of owner,
as if the family business transferred to children
had been sold to an unrelated party at « fair market value ».

* OECD: Organisation for Economic Co-operation and Development.

** Estate taxes are charged on amount of total estate left by deceased.
Inheritance taxes are charged on assets received by individual heirs.

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Contents of presentation

Why headquarters and family businesses are important

Many stakeholders have an interest in maintaining national ownership of businesses.

Most countries want to ensure that their national business ecosystem and headquarters keep prospering.

Corporate headquarters bring with them many benefits:

- High paying jobs.
- Challenging and interesting employment opportunities for young graduates.
- Regular work for professional firms (lawyers, accountants, engineers, business consultants, IT).
- Recurring work for sub-contractors.
- Income taxes for government on payrolls of these businesses and professional firms.

Conversely, when these businesses are acquired by foreigners, many of these benefits disappear along with headquarters. Many examples come to mind, in Quebec and the rest of Canada.

Countries with small populations face additional challenges regarding national headquarters, because:

- Smaller countries have much fewer national headquarters.
- Smaller countries have a much smaller pool of potential buyers, with fewer resources, compared to larger countries.

Many businesses are family-owned, with a long time horizon and a strong local attachment.

Many businesses were created and are still owned or controlled by individuals or families.

Typically, parents and their children have a long time horizon spanning generations; both would like to maintain local and national ownership of the family business through an orderly succession plan.

By contrast, other types of owners have a shorter time horizon, typically 5 to 7 years, rarely 10 years, including private equity funds and tax-advantaged investment funds that sponsor them.

Even worse, publicly-listed companies are measured every year, if not every quarter. Only family control can resist pressure to sell at every hiccup or when facing major challenges.

Family-owned businesses bring many benefits to their home countries and have a longer time horizon.

Why and how estate and inheritance taxes matter

Estate taxes are a major problem for family businesses in Canada and Quebec.

In theory, there are no estate or inheritance taxes in Canada.

In practice, a maximum tax rate of 27% (depending on the province) is applied on « deemed capital gains » at time of death, as if the family business had been sold at its « fair market value »; this tax is paid by the estate of the deceased.

However as may not be apparent to outsiders, families owning businesses often do not have cash on the side to pay estate taxes; these families have most, if not all, of their assets concentrated in their businesses.

At succession time, or even before, these Canadian families face a choice between:

- Selling out to the highest bidder, often from a different country.
- Or facing estate taxes that neither founder nor heirs can pay without borrowing or selling shares.

This analysis examines how other OECD countries deal with these issues.

Focuses on industrialized and democratic countries, all members of OECD, all comparable to Canada and Quebec. Does not include any tax havens, developing countries, or autocratic regimes.

Reviews and summarizes documents prepared by leading tax advisers Ernst & Young and KPMG comparing estate and inheritance tax systems around the world. Also draws from other specialty publications.

For Germany, delves deeper with local tax specialist into its complex inheritance tax system.

Presents a summary that can (easily ?) be understood by readers who are not tax specialists.

Background notes on the two principal authors appear on last two pages of document in Appendix B.

This comparative analysis was prepared for Cogeco Inc.

Notice to readers: Since tax rules are very complex in most countries, it is possible that unintentional inaccuracies, omissions or errors remain. Consult your own tax advisers. Corrections could be included in a subsequent edition.

A review of other OECD countries shows how they deal with estate and inheritance taxes, a major problem for maintaining local ownership of family businesses.

France: effectively little tax on estate or inheritance of businesses

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Nominal rate in France: inheritances are nominally taxed at a maximum rate of 45%.

In practice since August 2003, tax on inheritances can be as low as 5.6%:

- 45% tax rate only applies to 25% of business value transferred (11.25% effective tax rate), whether before or at death of owner.
- tax rate can be reduced by another half if owner is below 70 years old (5.6% effective tax rate).

This is known as « Pacte Dutreuil », named after minister Renaud Dutreuil who introduced this law.

Key conditions:

Owner must maintain ownership for at least 2 years after signing Pact.

Heirs must commit to keep ownership for at least 4 years.

At least one of the heirs must be part of senior management for at least 3 years.

When transferring family-owned businesses between generations, effective tax rate can be as low as 5.6% in France.

United Kingdom: effectively no or little tax on estate or inheritance of many businesses

Note: United Kingdom calls « inheritance tax » what other countries call « estate tax ».

This page will use « estate tax », to be consistent with rest of comparative analysis.

Nominal rate in United Kingdom: estates are nominally taxed at a maximum rate of 40%.

In practice since 1996 due to « business property relief » on estates for businesses:

- Tax is 0% if businesses are privately-held.
- Tax is cut by half to 20% if businesses are publicly-listed where owner controls more than 50% of votes.
- (For estates of 2nd generation heirs who individually inherited less than 50% of votes in a publicly-listed company: 40% tax upon their own deaths on full amount transferred to 3rd generation.)
- (For foreigners who are UK "residents" (i.e. not "domiciled" permanently in UK and not for more than 15 years), only UK-sited assets are taxed by UK at death.)

Tax on capital gains payable by heirs:

There is no capital gains tax payable by heirs when they inherit.

Cost basis of a business or shares inherited by heirs is increased to fair market value at time of death of donor.

- Tax is 20% on capital gain realized since heirs inherited the business if they sell the business or shares later on.
- Tax on capital gain can be reduced to 10% on first £1M of gains if asset qualifies for « business asset disposal relief » (previously known as « entrepreneurs' relief » before April 2020).

Key conditions for estate tax:

Owner must have owned the business for at least two years before transfer to next generation, whether transfer is while owner is alive or at death.

For family-owned businesses, there are no obligations on heirs to maintain any level of employment, or to forbid selling the business within a few years thereafter.

**No estate taxes when transferring family-owned private businesses between generations in UK.
Estate tax of 20% if deceased controlled more than 50% of votes in a publicly-listed company.**

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Dynamic European countries with no or low estate or inheritance taxes

Country	Pop (M)	OECD member	Start date	Summary description
Sweden	10	Yes	Dec 2004	• No estate or inheritance taxes, by unanimous decision of Swedish parliament. • Key objective was to facilitate transfer of family business between generations
Austria	9	Yes	2008	• No estate or inheritance or gift taxes of any kind on anything.
Norway	5	Yes	2014	• No estate or inheritance or gift taxes of any kind on anything. • Heirs assume liability for capital gains incurred on later sale of assets.
Denmark	6	Yes	2016-2020	• Had announced and started a 5% tax rate on inheritance of family business, but a new Social Democrats government brought back the former 15% rate.
Switzerland	6	Yes	--	• 0% to 3.5% inheritance tax on children heirs (varies by canton).
Netherlands	18	Yes	--	• Nominal 20% tax rate on inheritance. But reduced to 3.4% after 83% exemption if deceased had owned family business for 1+ year and if heirs continue to own for 5+ years.
Germany	83	Yes	--	• Objective: facilitate ownership transfer of « Mittelstand » family businesses between generations. • Until 2016: no inheritance or gift taxes subject to maintaining employment and family ownership for at least 7 years. • Since 2016: complex inheritance tax structure. Net effect is still no or low inheritance taxes for transfer of family businesses between generations, subject to maintaining payroll and family ownership for at least 7 years.

Countries are ranked by start date and then by increasing size.

Six smaller & dynamic European countries support perennity in their family businesses:
- either by not taxing estates or inheritances: Sweden, Austria and Norway.
- or by using low inheritance tax rates: 0% to 3.5% in Switzerland; 15% in Denmark.

Germany has a complex inheritance tax structure, but still has low or zero tax rates for « Mittelstand » family businesses (see Appendix A at pages 14 to 22).

More OECD countries with no or low estate or inheritance taxes

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Country	Pop (M)	OECD member	Start date	Summary description
New Zealand	5	Yes	1992	• No estate or inheritance taxes of any kind on anything.
Portugal	10	Yes	2004	• No estate or inheritance taxes of any kind on anything. • Exemption from 10% stamp tax for spouses and descendants.
Czech Rep	11	Yes	2014	• No estate or inheritance taxes of any kind on anything when heirs are direct family.
Australia	26	Yes	--	• No estate or inheritance of any kind on anything.
Italy	60	Yes	2006	• 4% inheritance tax for spouse and children. • 6% inheritance tax for brothers and sisters.

Countries are ranked by start date and then by increasing size.

Sources:

EY, "Worldwide Estate and Inheritance Tax Guide" (2019, 448 pages; 2021, 508 pages.)

KPMG web site for each country "Other taxes and levies", section on inheritance taxes. Jan 2020.

Swedish Enterprise, "Ten years without the Swedish inheritance tax". Dec 2015, 50 pages.

German tax specialist, Dr. Stefan Königer, Ph.D.

Various trade publications.

Other OECD countries also have no or low estate or inheritance taxes:

- In Europe: Portugal, Czech Republic and Italy.
- In Asia-Pacific: New Zealand and Australia.

Low % of tax revenues in OECD countries with estate or inheritance taxes

OECD country	Pop (M)	OECD member	Estate and inheritance taxes as % of total taxation revenue (average 2014-18)
Italy	60	Yes	0.0%
Spain	47	Yes	0.0%
Iceland	0.4	Yes	0.4%
Germany	83	Yes	0.5%
Finland	6	Yes	0.6%
Ireland	5	Yes	0.6%
Netherlands	17	Yes	0.6%
Switzerland	9	Yes	0.6%
United Kingdom	66	Yes	0.7%
France	67	Yes	1.1%
Belgium	12	Yes	1.3%
average			**0.6%**

Countries are ranked by increasing %.

OECD does not have data for the United States, and has only incomplete data for Canada.

Source: OECD, “Revenue Statistics - OECD countries”, online database, tax #4310, Jan 2020.

For OECD countries that still have estate or inheritance taxes, such taxes are a very low 0.6% of total tax revenues on average.

Removing inheritance taxes would not make a material difference in tax revenue for these countries.

Annual tax on net assets of individuals

Countries are ranked in same order as in pages 7 to 10.

Country	Pop (M)	OECD member	Start date	Summary description
France	68	Yes	2018	• Annual tax on net real estate value, max 1.5%. Replaced tax on wealth. • Generated about 0.2% of total tax revenues in 2018-9; 0.5% before 2018.
United Kingdom	68	Yes	--	• No tax on net assets.
Sweden	10	Yes	2007	• No tax on net assets.
Austria	9	Yes	--	• No tax on net assets.
Norway	5	Yes	--	• 0.85% per year on assets above NOK 1.5M (~US$160K). • Generated about 1.1% of total tax revenues in 2018-9.
Denmark	6	Yes	1997	• No tax on net assets.
Switzerland	6	Yes	--	• Annual tax of 0.1% to 1%; varies by canton. • Generated about 3.8% of total tax revenues in 2018-9. • (Switzerland has smallest total tax burden of 11 countries: 27.7% of GDP.)
Netherlands	18	Yes	--	• No tax on substantial interests (5% or more) in companies.
Germany	83	Yes	1997	• No tax on net assets.
New Zealand	5	Yes	--	• No tax on net assets.
Portugal	10	Yes	--	• No tax on net assets.
Czech Rep	11	Yes	--	• No tax on net assets.
Australia	26	Yes	--	• No tax on net assets.
Italy	60	Yes	2011-2014	• Annual tax on foreign financial assets: 0.2%; foreign real estate 0.76%. • Generated no tax revenue in 2018-9.

Source: OECD, "Revenue Statistics", online database, tax #4210, Oct 2021.

4 of these 14 countries have an annual tax on net assets of individuals, but generate low tax revenue.

Fourteen OECD countries have low or no estate or inheritance taxes

Key indications from 14 OECD countries:

A. 7 OECD countries have a simple system of no estate or inheritance taxes of any kind on anything: Australia, Austria, Czech republic, New Zealand, Norway, Portugal, Sweden.

B. 2 countries have a simple system of very low inheritance taxes: <3.5% in Switzerland, 4% in Italy.

C. France claims to tax at 45%, but in reality taxes as low as 5.6% on value of businesses transferred.

D. United Kingdom claims to tax estates at 40%, but in reality taxes at 0% or 20% due to « business property relief».

E. Netherlands claims to tax at 20%, but in reality taxes at 3.4% if deceased owned 5+% of an active company.

F. Germany has a complex structure whose net effect is still no or low inheritance taxes for transfer of family businesses between generations.

G. Denmark had announced a 5% tax rate on inheritance of family businesses, but a new govt maintained a 15% rate.

H. 10 countries have smaller populations, comparable to Canada and Quebec. Smaller countries have fewer family businesses and face special challenges in nurturing and protecting local ownership.

I. Scandinavian countries are generally seen as a model of social equity. As shown above, they have a tax system with either no (Sweden and Norway) or lower inheritance taxes (Denmark).

J. 4 countries have an annual tax on net assets: Sweden (0.85%), Switzerland (0.1% to 1%), Italy (on foreign financial assets 0.2%, and foreign real estate 0.76%), France (max 1.5% on real estate). These taxes generate low revenue.

A different path for Canada and Quebec:

1. A review of estate or inheritance taxes in other OECD countries shows a different path for Canada and Quebec to support perennity in their business ecosystem, by lowering or even eliminating effective taxes on estates.
2. In theory, there are no estate or inheritance taxes in Canada. In practice, a tax rate of 27% is applied on « deemed capital gains », and is paid by the estate of the deceased.
3. If Canada aligned with other OECD countries, when an owner of a business dies, the family would no longer have to sell all or part of the business, or borrow money to pay taxes on the estate.

The tax system in Canada and Quebec can be much improved to support perennity in family businesses.

APPENDIX A: GERMANY SUPPORTS PERENNITY IN ITS « MITTELSTAND » BUSINESSES WITH A COMPLEX STRUCTURE OF NO OR LOW INHERITANCE TAXES

Prepared with technical assistance from German tax specialist Dr. Stefan Königer, Ph.D.

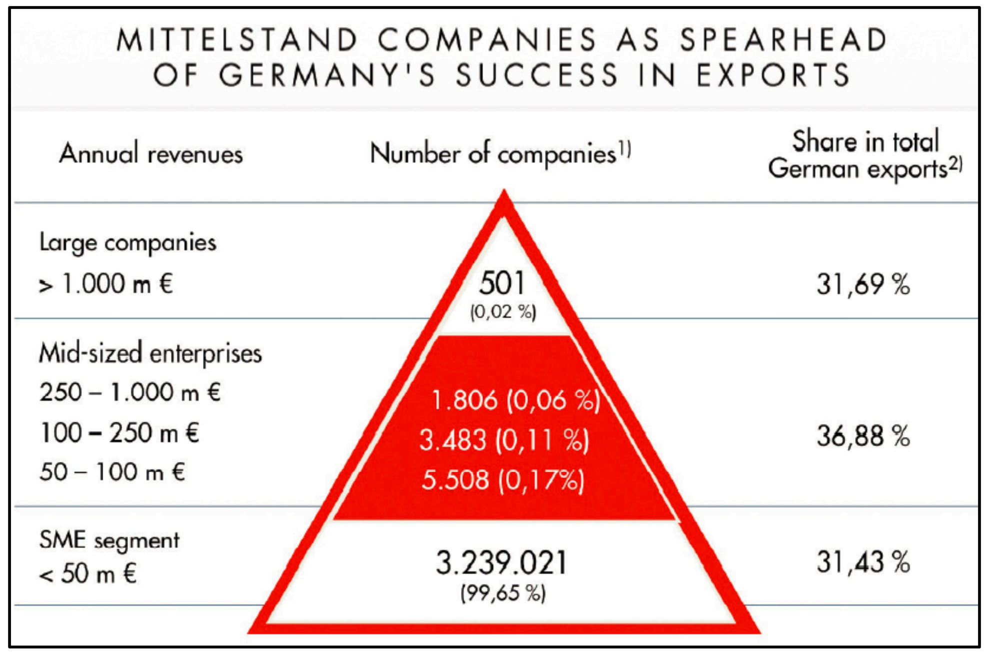
"Mittelstand" businesses in Germany: summary description

No official definition for "Mittelstand". Two definitions commonly used:

- Small & Medium-size Business ('SMB') with revenues up to 50M euros. (KMU: *kleine und mittlere Unternehmen).*
- Any business of any size owned or controlled by a family, including billion-euro businesses like BMW (Quandt family), Bosch (Bosch family), …

Attributes common to Mittelstand businesses:

- Family ownership, or family-type corporate culture.
- Continuity of ownership over generations.
- Long-term view.
- Independence.
- Agility.
- Psychological attachment.
- Investment in human resources.
- Flexibility.
- Simplified organization structure.
- Innovative.
- Focused on client needs.
- Social implication.
- Strong local ties.



Graph from
"The best of German Mittelstand:
the world market leaders"
Prof. Dr. Bernd Venohr. 2014-5.

Impact of Mittelstand businesses:

- Strong contribution to Germany's economic success.
- World leadership positions for many of these businesses.
- Strong contribution to German exports.
- Stable or growing employment across regions in Germany.

Four inheritance tax measures re shares in « Mittelstand » businesses

Government and society objectives in Germany

Encourage sustainability of businesses during inter-generational transfers to:
- Protect existing jobs and create new ones.
- Keep headquarters in Germany.
- Support positions of businesses that are part of "Mittelstand" and who are champions on European or global scale.

German inheritance tax supports corporate sustainability

#1. Inheritance tax is payable by each heir on share received (and not by deceased on whole estate as in Canada).
This measure applies to any kind of inheritance, multiplies basic exemptions and reduces effective taxes to be paid.

Details and examples on page 19

#2. For intergenerational transfers of qualified businesses, and for transfer values of up to around 50M euros per heir:
tax rates are less than 10% (compared to 27% in Canada).

#3. For higher transfer values per heir in cases of <u>less affluent heirs</u> who would have been forced to borrow money or sell shares to pay inheritance tax:
Tax relief with tax rate of 10% or less.

Details and examples on page 20

or

#4. For higher transfer values per heir in cases of <u>more affluent heirs</u>, possibility of receiving shares by an “irrevocable family trust”.
Trust with effective inheritance tax rate of 0%.

Details and examples on page 21

Four inheritance tax measures ensure sustainability, and support intergenerational transfer, of German businesses.

Key conditions for German heirs to benefit from special inheritance tax

A. Received shares are held by heir for at least seven years.

B. Average wages and salaries within last five years before transfer of shares remain at least stable for seven years after transfer.

C. Conditions are respected for eligible businesses and privileged business assets.

Eligible businesses and activities	Non-eligible businesses and activities
• Commercial business: an independent sustainable activity that is aimed at realization of profit by participating in general economic transactions. • A whole business, a branch of a business or a (partial) interest in a partnership. • A commercial partnership. • An "irrevocable family trust".	• Acquisition of individual economic assets. • Mere private asset administration.
Privileged business assets	**Non-privileged assets**
• Assets that serve a commercial business. • Assets for purposes of conducting a liberal profession. • Agricultural and forestry assets located in Europe.	• Real estate or parts of real estate, works of art, art collections, scientific collections, libraries and archives. • Means of payment, securities, coins, precious metals, precious stones and pearls, stamp collections, vintage cars, yachts, sailplanes as well as other items typically serving a private lifestyle.

Key conditions:
Business should continue to be owned for at least 7 years, and payroll should be at least stable for 7 years.
Any type of business (manufacturing, services, software, …) except those specifically forbidden.
Any type of assets (machinery, rolling stock, intellectual property,…) except those specifically forbidden.

Inheritance tax rates on eligible values in German Mittelstand businesses

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Inheritance tax rates since 2016

Company value inherited individually by each heir	Tax rates on inheritance	
	85% regular exemption (over 5 years)	**100% optional exemption (over 7 years)**
€ 0 - 26 M	15% of FMV* is taxed up to 19% (max 3%)	0%
€ 26 M - 90 M	Exemption is reduced by 1% for each €750K step.	
€ 90M & more	30%	30%

* FMV: fair market value

Company value inherited individually by each heir	Tax rates on inheritance
€26 M - 39 M	5%
€39 M - 52 M	10%
€52 M - 65 M	15%
€65 M - 78 M	20%
€78 M - 90 M	25%

Note:
Contrary to usual tax rates in Germany and other countries, inheritance tax rates apply to total value of transferred shares, not just to incremental value in tax bracket.

Measures #1 and #2: tax rates when inheriting shares in a business

Total value of transferred company shares	# of German heirs (regardless of family relationship)					
	1	2	3	4	5	6
€ 25 M	0%	0%	0%	0%	0%	0%
€ 50 M	8.6%	0%	0%	0%	0%	0%
€ 100 M	30.0%	8.6%	1.7%	0%	0%	0%
€ 250 M	30.0%	30.0%	22.8%	14.4%	8.6%	4.6%
€ 500 M	30.0%	30.0%	30.0%	30.0%	30.0%	22.8%
€ 1,000 M	30.0%	30.0%	30.0%	30.0%	30.0%	30.0%

These 30% tax rates can be greatly reduced by effective tax planning:
- Asking to pay less taxes due to not having enough personal assets to pay inheritance taxes that would be due.
- Or receiving shares through an "irrevocable family trust". (see next 2 pages).

Also for values greater than 26M euros, special discounts up to 30% of Fair Market Value can be applied to reduce tax base.

Nominal tax rates in Germany:
- Much lower than Canada's 27%.
- Lower than in Canada.
- Slightly higher than in Canada.

Measures #1 & #2. When transferring business shares after owner's death, German effective tax rates are less than 10% until about 50 M euros per heir.

Measures #3 & #4. In addition, even when tax rates appear to be higher than in Canada starting around 90 M euros per heir, German heirs can arrange to pay taxes at much lower rates (see next 2 pages).

Measure #3. To reduce inheritance taxes: German heirs can ask to pay lower taxes

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Technically speaking: “apply for assessment of need for tax relief”.

When useful and possible:

This approach is allowed if heir(s) would have to borrow money or sell shares to pay inheritance taxes.

Heirs can apply for tax relief if they do not have enough personal assets to pay inheritance taxes:

- either from assets already owned by heir;
- or from assets received as part of inheritance or gift that do not qualify as privileged business assets.

After approval by tax authority, inheritance and gift taxes are limited to 50% of fair market value of all assets that are not qualified as privileged business assets, either pre-owned by heir or received as part of inheritance.

In addition, taxes payable can be deferred up to 7 years, at annual interest rate of 6%.

Example:

An heir already has personal assets of 5M euros including houses, a boat, bonds and cash.

This heir inherits shares worth 100M euros on which the heir would normally pay 30 M euros in taxes.

But after receiving approval of assessment by tax authority, this heir will only pay 2.5M euros in taxes (50% of 5M).

This heir would pay a 2.5% tax rate (2.5 M euros in taxes on 100M euros in value received).

By asking for tax relief, a less affluent heir would not have to pay 30% in taxes,
but would fall back into 0% to 10% tax brackets,
even while receiving shares worth 100M euros or much more.

Measure #4. To reduce inheritance taxes: business owners can set up trust fund(s)

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Technically speaking: "transfer shares to an irrevocable family trust" (in German: "Familienstiftung")

When useful and applicable :

This approach is useful for transferring high-value businesses to heir(s):
- that already have high personal assets;
- and for whom "application for assessment of need for tax relief" would still result in high inheritance taxes.

This is a commonly used tax planning opportunity that is specifically mentioned in German laws.

As part of tax planning prior to death, business owners can set up irrevocable trust(s) for the benefit of heir(s).

As in tax measure #3, a 50% tax rate is applied to fair market value of all assets pre-owned by the trust.
When receiving these shares, an irrevocable trust that had no prior assets will pay no taxes. (50% of zero assets = 0 euros).

Potential disadvantages:

Heirs will not have any direct influence on the business, because this trust does not have shareholders.
This disadvantage of no direct influence can be mitigated by setting up appropriate governance structure.

Gift tax and corporate income tax will be due if this trust is dissolved or liquidated.

Example:

An heir already has personal assets of 50M euros including houses, a boat, bonds and cash.

This heir inherits shares worth 250M euros on which the heir would normally pay 75 M euros in taxes.

If the heir applied for tax relief, this heir would still pay 25M euros in inheritance taxes (50% of 50M euros = 25M euros).

But receiving shares through an irrevocable trust would mean heir pays no taxes (50% of zero assets = 0 euros).

This heir would pay a 0% tax rate (0 M euros in taxes on 250M euros in value received).

By setting up irrevocable trust(s), German business owners can ensure that their more affluent heir(s) would not have to pay 30% in taxes, but would fall back into 0% to 10% tax brackets even while receiving shares worth 100M euros or much more.

German inheritance tax rates on non-eligible assets in a business

Type of heir	Tax class 1	Tax class 2	Tax class 3
	Spouse / civil partner. Chidren, grand children. Parents , grand parents.	**Brothers & sisters. Nieces & nephews. Relatives by marriage.**	**All other individuals. Corporations.**
Value of individual inheritance for each heir			
€ 0 à 600 K	7% to 15%	15% to 25%	30%
€ 600K à 6M	19%	30%	30%
€ 6M à 13M	23%	35%	50%
€ 13M-26M	27%	40%	50%
>€ 26M	30%	43%	50%

Notes:

1. These tax rates are applied to the final tax base of inheritances & gifts, after deduction for privileged business assets.
2. Privileged business assets are always taxed in tax class 1.
3. These tax rates apply to incremental value of inheritance received (unlike tax rates on eligible values in German Mittelstand businesses).

APPENDIX B:
SUMMARY PROFILES OF AUTHORS

Summary profile of Louis Caouette

A full profile and description is available at www.louiscaouette.ca.

Has assisted 2 Quebec-based companies in growing to billion-dollar revenues:

- A family-controlled company, transiting soon to its 3rd generation, and regularly approached for selling to outsiders.
- A company controlled by tax-advantaged investment funds, who sold it recently to a foreign corporation; most of the senior management team left within months of the sale.

35+ years of consulting experience in strategic analyses:

- Past consulting experience with, and about, telecom, energy, and various technical markets & industries.
- Projects typically have North American or international coverage.
- Has conducted projects across North America, in Europe and in Asia.
- Works directly with clients on his assignments.
- As required, works closely with other specialists in production, IT, finance, market research,...

Extensive experience assisting fast growing companies, over many years and types of projects:

- Identify and analyze acquisition targets.
- Assess new business opportunities.
- Research and analyze competitors.
- Obtain, analyze and summarize market data, from public and private databases, or field interviews.

B.S. Electrical Engineering (Laval University)

M.A. Economics (Laval University)

MBA (Harvard Business School)

(No degree and no training in tax planning or reporting.)

Summary profile of Dr. Stefan Königer

Stefan Königer, Ph.D., is a former tax partner in succession planning at Ernst & Young in Germany. He also spent six months as a client service contractor (succession planning) at Ernst & Young in Washington, D.C. (United States).

Previously, he worked as an assistant tax manager (succession planning) at PricewaterhouseCoopers in Germany for two years. He is also a member of the discussion group on practical tax issues and the association for the promotion of business taxation and audit, both at the University of Hohenheim in Stuttgart, Germany.

His passion for taxes regarding succession planning has shone through numerous academic and professional articles he published in a variety of German tax journals. In 2015, he was awarded a prize by Ernst & Young for the best specialist publication on the topic of taxes (Inheritance and Gift Tax Act).

Dr. Königer is the author of many publications, including:

“The New German Inheritance and Gift Tax Act – finally meeting the constitutional principles?”, 2017, 17 pages.

“The German Inheritance and Gift Tax: Commentary and Analysis”, 2017, 370 pages.

Specific or technical questions about the German tax system should be addressed directly to Dr. Königer.

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