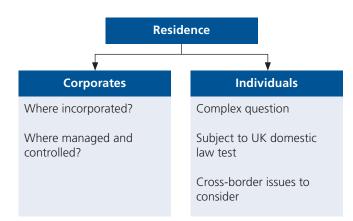


## **UK Tax for Start-Up Founders**

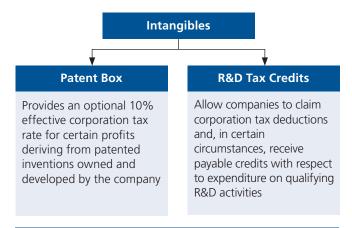
### What should you be thinking about?



#### **Corporate Structure**

Tax considerations will feed into group structuring, alongside general legal and regulatory requirements

This will be important to consider from the outset, to future-proof the group in its growth markets



### **Digital Nomads**

Employing the best people means recruiting internationally, and providing your people with the flexibility to work wherever they want

But internationally mobile employees can cause uncertainty around employment tax compliance in different jurisdictions



Further information, including a list of our offices, can be found at **cms.law** © CMS Legal Services EEIG (2022). 2212-0168149-3

### \_\_\_\_\_

**Founder Shareholdings** 

Business Asset Disposal Relief may help reduce CGT on disposal of shares by individuals holding more

than 5% shareholdings

**CGT** 

Are founders also employees / directors?

**Employment Taxes** 

If so, HMRC may treat all or part of their shareholdings as 'employment related' and so subject to employment taxes in certain circumstances

Key question: trading or investment?

**Legislation Lag** 

### **Crypto and Digital Assets**

- Worldwide uncertainty around taxation of crypto and digital assets
- Novel category of assets, with distinct and innovative features
- HMRC has guidance on taxation of crypto, for individuals and businesses, but much of this guidance remains untested, with HMRC's interpretation potentially liable to challenge or to change
  - HMRC broadly treats buying and selling of crypto by individuals as an investment activity, with CGT on disposal
- Crypto received as employment income will be subject to employment tax and NI

#### Any questions? Get in touch



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