
EXPLANATORY NOTE

(This note is not part of the Order)

The Protocol scheduled to this Order makes certain alterations to the Convention set out in the Schedule to [S.I 1978/1408](#), the Double Taxation Relief (Taxes on Income) (Switzerland) Order 1978. Article 1 of the Order provides for its citation.

Article 2 makes a declaration as to the effect and content of the arrangements set out in the Protocol contained in Part I of the Schedule to the Order and in the Exchange of Notes contained in Part II and that it is expedient that those arrangements should have effect.

A detailed explanation of the Protocol can be found in the Explanatory Memorandum published with the Protocol and which may be seen on the web-site of the Office of Public Sector Information at <http://www.opsi.gov.uk/stat.htm>

The Protocol will enter into force on the date of the later of the notifications by each country of the completion of its legislative procedures. It will take effect in the United Kingdom as follows—

- (a) with respect to income tax and capital gains tax, for any year of assessment beginning on or after 6th April in the calendar year following that in which the Protocol enters into force; and
- (b) with respect to corporation tax, for any financial year beginning on or after 1st April in the calendar year following that in which the Protocol enters into force; and
- (c) with respect to tax credits in respect of dividends paid by companies which are residents of the United Kingdom, to terminate any entitlement to such tax credits in respect of dividends paid on or after 6th April next following the date on which this Protocol enters into force; and
- (d) with respect to exchange of information falling within sub-paragraph (a) of paragraph 1 of Article 25, information shall be exchanged on or after the date on which the Protocol enters into force; and
- (e) with respect to exchange of information falling within sub-paragraph (b) of paragraph 1 of Article 25, information shall be exchanged for any financial year beginning on or after the date on which the Protocol enters into force; and
- (f) with respect to exchange of information falling within sub-paragraph (c) of paragraph 1 of Article 25, information shall be exchanged for offences committed on or after the date on which the Protocol enters into force.

The date of entry into force will, in due course, be published in the *London, Edinburgh and Belfast Gazettes*.

A full regulatory impact assessment has not been produced for this instrument as no impact on the private or voluntary sectors is foreseen.