

# Building Strong Cross-Border Tax Architecture: The Foundation of Global Wealth

For internationally mobile families, wealth planning conversations often gravitate quickly toward investments, succession or insurance. These are important. But without a clear and current understanding of the complete global tax position, every subsequent decision is built on uncertain ground. Tax architecture is not the most engaging part of the conversation. It is, however, the part that determines whether everything else works.

## Understanding the Entire Global Position

International families typically hold assets across multiple jurisdictions: UK pensions, offshore trusts, foreign property, business interests spanning several countries. The questions that must be answered before any planning can begin are straightforward, but the answers rarely are. Where are the assets held? How are they structured? What is the tax treatment in each jurisdiction? What happens to existing arrangements if the family moves again? Are structures that were established years ago still fit for purpose under today's rules?

This process, what we call “kicking the tyres”, is where every client relationship should begin. It is not where most families expect the conversation to start. But it is the only foundation on which sound long-term planning can be built.

## Legacy Structures: Fit for Purpose or Out of Date?

Many internationally mobile families rely on structures created under very different circumstances. A trust established a decade ago may have been perfectly appropriate for the family's position at the time. The family's residency, the composition of their assets, the jurisdictions involved and the tax rules governing all of them may have changed substantially since. Structures do not automatically evolve with circumstances. They require periodic review, and that review requires someone with visibility of the complete picture.

## How the Landscape Has Changed

The environment in which cross-border structures operate has shifted significantly in recent years. Automatic exchange of information between tax authorities, increased transparency requirements, and evolving interpretations of tax residence have all altered what is possible and what is compliant. Arrangements that were efficient and entirely appropriate under an earlier regime may now require careful review and potential restructuring. This is not a reflection of poor original planning. It is a reflection of how substantially the international tax landscape has moved.

## Investment Strategy Follows Tax Architecture

Many families want to begin with investment selection. The asset allocation conversation is more intuitive and often more engaging than a structural review. But investment decisions made without a stable tax foundation can be inefficient at best and counterproductive at worst. The location of assets, the choice of wrapper, the currency of holdings and the timing of disposals all interact with the underlying tax architecture in ways that matter enormously for long-term outcomes.

Only once the full picture is understood can meaningful conversations follow about investment strategy, succession planning and wealth preservation. The sequencing is not a procedural preference. It is the difference between advice that holds together across borders and advice that doesn't.



### **The Foundation of Long-Term Confidence**

For internationally mobile families, tax architecture provides something that goes beyond compliance. It provides clarity about where the family stands, control over how their wealth is structured, and the confidence to make decisions about the future knowing that the foundations beneath them are sound. That clarity is not a one-off exercise. It requires ongoing review as circumstances, jurisdictions and rules evolve.

Getting the architecture right is not the most visible part of cross-border wealth management. It is, however, the part that makes everything else possible.

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