

Leaving the Nordics. What it costs to go, and when.

Denmark, Sweden and Norway each tax departure differently. What they share is that the decisions which matter most have to be made while you are still resident.



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Leaving is a taxable event.

In all three countries, ceasing to be tax resident is not a neutral administrative step. It is a moment the tax system treats as significant, and in some cases as equivalent to a sale.

The mechanisms differ. The underlying logic does not: each country wants to tax the value that accrued while you lived there, and each has built rules to make sure departure does not avoid that.

What this means practically is simple, and almost universally underestimated. Nearly everything worth doing has to be done **before** the departure date. After it, you are managing consequences rather than choosing outcomes.

The most common mistake

Treating the financial side as something that follows the removal van. By the time the move is complete, the decisions that would have mattered most are no longer available.

Three things that are true everywhere

- **The date is a decision.** When residency ceases is often more consequential than where you are going. It can frequently be influenced.
- **Unrealised gains are in scope.** You may face tax on value you have not converted to cash, which creates a liquidity question of its own.
- **A company sale changes everything.** Whether a business is sold before or after departure, and how long separates the two, materially affects the outcome.

Same principle, three systems.

Denmark

Latent gains on shares and certain assets above a threshold become subject to exit taxation when full tax liability ceases. The liability arises regardless of whether anything is sold. Deferral is possible in defined circumstances and brings ongoing reporting obligations with it.

- Pension arrangements — ratepension, kapitalpension, aldersopsparing — each behave differently on departure.
- Structures under §53A are treated distinctly from ordinary holdings and are worth understanding before the move.
- Business owners using virksomhedsordningen have particular timing considerations around retained profits.

Sweden

Sweden's approach is less about a single exit charge and more about extended reach. The ten-year rule allows Sweden to tax gains on certain assets for a period after you leave, and SINK applies to pension income paid to non-residents.

- The SINK rate has changed more than once. Planning that assumed a fixed level has repeatedly been overtaken.
- Treaties have been renegotiated where taxing rights previously sat with the country of residence. A treaty is a political agreement, not a guarantee.
- Capital left inside Swedish pension arrangements continues to follow Swedish rules wherever you live.

Norway

Norway applies exit taxation on unrealised gains above a threshold, and a wealth tax for as long as you remain resident. Several settlement options exist — immediate payment, instalments over a defined period, or deferral — and the choice has real liquidity consequences.

- Not every holding falls within the exit tax net. Mapping which do is usually the first useful exercise.
- In some cases a disposal and reacquisition while still resident can reset the cost base advantageously.
- Growth accruing inside a structure is treated differently from growth on a personal balance sheet for wealth tax purposes.

The company sale is where it usually goes wrong.

Of everything in this guide, the sale of a business alongside a move is the situation most often addressed too late — and the one where the cost of lateness is highest.

A sale completed while you remain fully liable in your home country is treated differently from one completed afterwards. That much is widely known. What is less understood is that the sequencing cannot be improvised retrospectively: the structure has to exist, and have substance, well before a process begins.

What should be settled in advance

- **Order and interval.** Whether the company is sold before or after departure, and how much time separates the two events.
- **Ownership structure.** Holding arrangements and shareholder agreements reviewed long before a buyer is in the room.
- **Genuine substance.** Structures assembled at the last minute without real substance rarely achieve what was intended, and can create problems later.
- **Where the proceeds land.** A large cash balance left unstructured is itself a decision — simply not a deliberate one.

A note on advisers

Corporate finance advisers optimise the transaction. Tax advisers address the filing. Neither is normally asked about where the seller will be resident in eighteen months, or what happens to the proceeds afterwards. That gap is where most of the value is lost.

The liquidity point

Exit taxation on unrealised gains can create a tax liability without a corresponding receipt of cash. Anticipated in advance this is manageable, through the choice of settlement method or the timing of disposals. Discovered afterwards it can force a sale at precisely the wrong moment.

Three years is not early. It is the whole opportunity.

Three years out

Everything is available. Exposure mapped, cost bases reviewed, growth repositioned, a sale properly sequenced, settlement method chosen deliberately.

Twelve months out

Most options remain. Structures can be established with genuine substance and the departure date planned rather than assumed.

Six months out

Several of the most effective measures have already closed. What remains is worth doing, but the range is narrower.

Already gone

Now about managing consequences: reporting, deferral obligations and the structure of what you hold in the new country.

Six questions worth answering

- ☐ On what date will your full tax liability actually cease, and can that date be influenced?
- ☐ Which of your holdings fall inside the exit tax net, and which sit outside it?
- ☐ Would resetting a cost base before departure improve your position?
- ☐ Is a company sale likely, and is it sequenced against the move?
- ☐ If exit tax applies, where does the cash to pay it come from?
- ☐ What happens to your pension arrangements, and do they follow you?

A straight look at your situation

No cost, no obligation, and no product conversation until there is a reason for one. If there is nothing to gain, I will tell you.

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