

GHM GmbH

■■■ Steuerberatungsgesellschaft

Latest Developments in International Taxation from a German Perspective

LEA Convention Paris

Overview

Köln, April 2026



Agenda

1. Completed legislative procedures (selection)
2. Newest Developments in Tax and Inheritance Tax
3. Foreign Family Foundations and Trusts
4. Exit taxation
5. Permanent Establishment Taxation
6. Highlights in Case Law on International Tax Law
7. Withholding Tax and Treaty Override

Completed legislative procedures (selection)

Act on an Immediate Tax Investment Programme to strengthen Germany as a Business Location of 14 July 2025, Federal Law Gazette I 2025 of 18 July 2025, pp. 1–3

Art. 1 Amendment to the Income Tax Act

Increase in the tax allowance for electric vehicles to EUR 100,000 at a tax rate of 0.25%

Declining balance depreciation for the employer's movable assets

Depreciation of electric vehicles: 75%/10%/5%/5%/3%/2% over the first 6 years

Amendment to Section 34a of the Income Tax Act

Art. 2 Amendment to the Corporation Tax Act:

Tax year up to 2027: tax rate 15%

Tax year 2028: tax rate of 14%

Tax year 2029: tax rate of 13%

Tax year 2030: tax rate of 12%

Tax year 2031: tax rate of 11%

From tax year 2032: tax rate of 10%

⇒ Note that a solidarity surcharge of 5.5% of the tax is still in place and in most cases the trade tax (a municipal tax) is applicable

⇒ The average combined tax rate for corporations amounts to 31% today, declining to 25.8% from 2031

Art. 3 Amendment to the Research & Development Allowance Act

Completed legislative procedures (selection)

Minimum Tax Adjustment Act of December 23, 2025 (MinStAnpG, Federal Law Gazette I No. 353)

- **Key changes:** Retention of the minimum tax and implementation of certain adjustments; simplifications in foreign tax law
 - **Section 4j EStG (deduction of expenses related to licenses): Repealed without replacement** as of the 2025 tax year.
 - Adjustment to the **additional taxation rules/”Controlled Foreign Corporation Rules”** (§§ 7 to 13 AStG / Foreign Tax Act):
 - General Rule: **Passive** foreign earned income is included in German income if it is taxed at a tax rate of less than 15% (since 2023).
 - Section 9 of the Foreign Income Tax Act (AStG): Increase of the exemption limit to EUR 100,000.
 - Section 13 AStG: Introduction of a **participation limit (of 10%)** for income of a capital investment nature (effective July 1, 2021).

Note: “Steuerroasenabwehrgesetz” – “Tax Haven” Prevention Act

Gift and Inheritance Taxes in Germany

Inheritance tax/ gift tax: Exemption amounts and tax rates since 2010		Class I			Class II	Class III
		Spouse, life-partner	Child, stepchild, adoptive child	Grandchild	Sibling, parent, nephew, uncle, aunt,...	Unrelated person
Transferee						
Exemption amount to be granted once in a 10 year period		500.000 €	400.000 €	200.000 €	20.000 €	20.000 €
Value donated or bequeathed after deduction of liabilities bequests and exemption amount	Up to 75.000 €	7 %			15 %	30 %
	From 75.001 to 300.000 €	11 %			20 %	30 %
	From 300.001 to 600.000 €	15 %			25 %	30 %
	From 600.001 to 6.000.000 €	19 %			30 %	30 %
	From 6.000.001 to 13.000.000 €	23 %			35 %	50 %
	From 13.000.001 to 26.000.000 €	27 %			40 %	50 %
	Above 26.000.000 €	30 %			43 %	50 %

Exemption of business assets

Tax Exemptions for Eligible Assets under €26 Million



Definition of Eligible Assets (Sections 13a–13c, 28a of the Inheritance Tax Act)

Eligible assets

- a) Shares in **corporations** with their registered office or management in Germany / an EU or EEA country and a direct holding by the decedent or donor of **more than 25%** of the par value
- b) **Domestic business assets** upon acquisition of an entire business, a part of a business, or a **co-owner's share**

Non eligible assets („Verwaltungsvermögen“), assets not required for business operations are not exempt from inheritance tax

- Business assets (e.g., real estate made available to third parties for use (exceptions may apply), shares in corporations of $\leq 25\%$, financial assets) is generally detrimental and **not eligible for tax benefits**
- Exceptions are possible if the value represents a small proportion of the fair market value of the business assets; this does not apply to recent contributed assets and recent added financial resources (< 2 years in the business assets)



Determination of the **exempted estate**

Exemption of 85% of inheritance tax and, if applicable, a deduction of up to €150,000



Requirements: Continuation of wage total (400% of the initial wage total) and a holding period of **5 years**



Option: **100% exemption** provided the wage bill reaches 700% of the initial wage bill and a retention period of **7 years** is met

Exemptions for exempt assets > €26 million (upon application)

- 1 Phased reduction model pursuant to § 13c ErbStG
 - Reduction of the exemption allowance
 - No exemption deduction above €90 million

or

- 2 Pursuant to § 28a ErbStG Exemption needs
 - Possibility of tax exemption on the exempted assets
 - Proof required that tax cannot be paid from available assets

Guidelines from the Federal Supreme Court on German inheritance tax

Judgment of June 22, 1995 – 2 BvR 552/91

- **Requirement:** Elimination of unequal treatment of various types of assets.
- However: The threat to small and medium-sized businesses posed by inheritance tax must be taken into account.
- Therefore, a **more moderate tax burden** is warranted.
- **Consequence:** 1997 reform (new valuation rules).

1995

2006

Judgment of November 7, 2006 – 1 BvL 10/02

- Continued preferential treatment under valuation law for certain types of assets.
- **Requirements:** (1) Consistent valuation at fair market value and (2) systematically consistent exemption rules.
- **Consequence:** 2009 Inheritance Tax Reform with rules on real estate tax relief (see slide before).

Judgment of Dec. 17, 2014 – 1 BvL 21/12

- **Privileging of business assets is generally permissible.**
- **Requirements:** (1) Means testing for tax exemptions for large companies and (2) elimination of excessive exemptions (e.g., non eligible assets).
- **Consequence:** Inheritance Tax Reform 2016 (in particular: special provisions for large acquisitions (exceeding EUR 26 million)).

2014

2026 ?

New ruling (Case No. 1 BvR 804/22) in 2026?

- Constitutional appeal against the decision of the Federal Fiscal Court dated January 17, 2022 – II B 49/21).
- Expectation?

The SPD Concept

Under the title “FairErbem,” the SPD recently published a proposal for inheritance tax reform. Specifically, the following changes would result:


- Family inheritance (all relatives in tax classes I and II) up to 1 million euros tax-free (lifetime exemption)
- Elimination of the existing exemption rules for business and capital assets
- **Corporate tax exemption of 5 million euros**
 - A 5-year holding period and a minimum wage bill of 400% remain required
 - Tax avoidance through business splits should not be possible
- Tax exemption for family homes remains unchanged
- Expanded deferral provisions: Inheritance tax payments spread over 20 years from current profits
- Progressive tax rate (details not specified)





There is reason to fear that a comparatively **low business allowance of 5 million euros** would **quickly be exhausted** under the simplified income approach (in simple terms: multiplying the tax balance sheet profit by a factor of 13.75). Furthermore, from a constitutional perspective, the **necessity** of such a **far-reaching reform** is likely to be **questionable!**


Attribution taxation pursuant to Section 15 of the Foreign Tax Act (AStG)

Section 15 of the Foreign Tax Act (AStG): Key Points

 Attribution taxation treats the proportionate inflow of the foundation's current income as having accrued to the founder and the beneficiaries ("*dry income*")

 Scope of application: Family foundations, equivalent legal entities (trusts), and (currently) corporate foundations with their registered office and management outside Germany

 The concept of multi-tiered inclusion applies to downstream and controlled foreign corporations or foundations

 The aim of imputed taxation is to combat tax evasion and capital flight

- A **family foundation** within the meaning of the provision is a foundation in which the founder, his or her relatives, and their descendants are entitled to **more than half of the assets**.
- Other special-purpose assets, asset pools (e.g., **trusts**), and associations of persons (whether or not they have legal personality) are treated as equivalent to foundations.
- Attribution taxation applies to the settlor as well as to beneficiaries and persons entitled to receive the proceeds who are subject to **unlimited tax liability in Germany**.
- Attribution taxation may be waived (**escape clause pursuant to Section 15 (6) AStG**) if
 - the family foundation has its management or registered office in an EU/EEA country,
 - the foundation's assets are legally and effectively withdrawn from the beneficiaries and persons entitled to receive them, and
 - An exchange of information has been agreed between Germany and the country where the foundation is headquartered (e.g., via the Mutual Assistance Directive pursuant to the EU Mutual Assistance Act)
- Note: According to the Federal Fiscal Court (BFH) (e.g., IX R 32/22), Section 15 of the Foreign Tax Act (AStG) restricts the free movement of capital (the escape clause must therefore **be extended to third countries**).

Section 15 AStG-E (DRAFT)

	Section 15 of the AStG (current version)	Section 15 AStG-E
<i>Low-tax threshold</i>	<ul style="list-style-type: none"> – The current imputed taxation covers all income of the foreign family foundation (no distinction between active and passive income, regardless of foreign taxation). 	<ul style="list-style-type: none"> – Introduction of a low-tax threshold of 15%. – No distinction between active and passive income.
<i>Definition of a foreign family foundation</i>	<ul style="list-style-type: none"> – A family foundation is a foundation in which the founder, his or her relatives, and their descendants are entitled to more than half of the assets. 	<ul style="list-style-type: none"> – Expansion of the “family circle” to include close relatives within Germany and abroad
<i>Escape Clause / Proof of Exoneration</i>	<p>The escape clause applies if</p> <ul style="list-style-type: none"> – the family foundation has its registered office or management in an EU/EEA country, – the assets are legally and effectively removed from the control of the founder and the beneficiaries, – there is a sufficient exchange of information. 	<ul style="list-style-type: none"> – Fundamental revision of the Proof of Relief concept. – The scope of application is extended to third party countries (exchange of information required). – The deprivation of power of disposal is replaced by the absence of an “artificial arrangement.”
<i>Downstream companies and foundations</i>	<ul style="list-style-type: none"> – Concept of multi-tiered attribution of income from downstream controlled foundations or companies – According to the Federal Finance Administration, there is no escape clause, but a substance test may apply. 	<ul style="list-style-type: none"> – The existing concept remains in place in principle (limited to regular HZB). – Proof of relief is to be expressly (and “clarifying”) for income from downstream companies and foundations.

Exit Taxation

Introduction and Overview

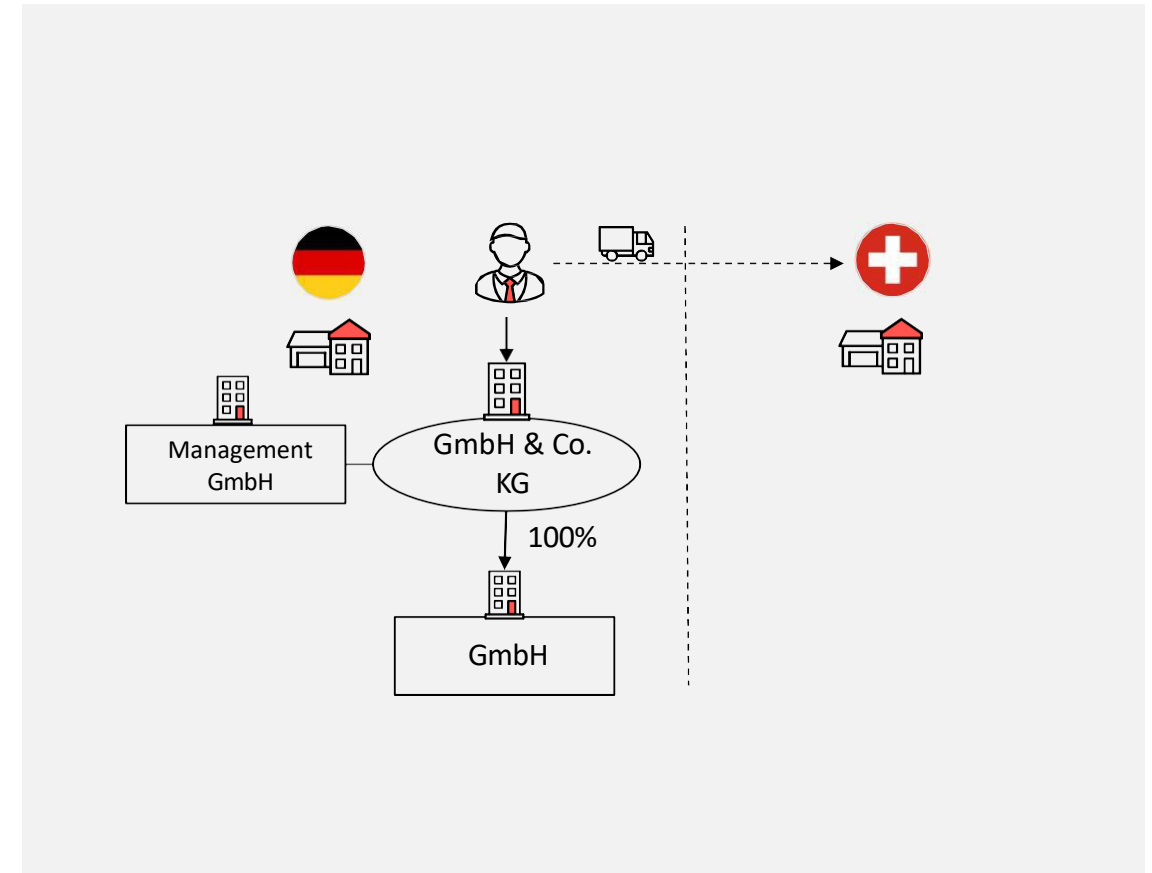
- **Section 6 AStG: The departure** of a taxpayer from Germany with a participation within the meaning of § 17 EStG (owning shares of a corporation amounting to 1% of private assets) due to loss of residence or substitute circumstances **may trigger exit taxation.**
- **Recent tightening** of regulations:
 - **Elimination of** permanent, interest-free **deferrals** in EU cases (!)
 - (Retroactive) **extension of the so-called distribution ban** to departures (consequence: revocation of the deferral).
- **The compatibility** of exit taxation **with EU law** remains disputed.
- Legislators are not shying away from **further tightening of the rules.**
 - **Exit taxation of investment shares** introduced by the Annual Tax Act of December 2, 2024 (Federal Law Gazette 2024 I, No. 387).

Avoidance of exit taxation

Managing Holding KG (for now!)

“Traditional” unbundling pursuant to Section 4 (1), sentence 3 of the German Income Tax Act (EStG)

- 1) **Solution (including third countries):** Functional allocation of the equity interest to the KG’s German permanent establishment.
- 2) No exit taxation within the meaning of § 6 AStG, as there is no equity interest in a corporation held in private assets:
 - No pro-rata deferral (Section 6 (4) AStG).
 - No repatriation rule (Section 6 (3) of the Foreign Tax Act).
- 3) However: Application of exit taxation (Section 4(1), sentence 3, EStG):
 - Tax-related **decoupling of business assets** (in cases where German taxing rights are excluded or restricted).
 - In principle, creation of a balancing item is possible (Section 4g, § 36 (5) EStG) = pro rata over 5 Years deferral (**only EU/EEA countries**).



Be cautious with investment shares

- As part of **the 2024 Tax Act (JStG 2024)**, the legislature has introduced a **deemed disposition** of shares in **investment funds** under § 19 (3) of the Investment Fund Tax Act (InvStG) and of **shares in SIFs** under § 49 (5) of the InvStG in the event of the taxpayer's departure, **effective January 1, 2025**.
- This was **prompted** by reports filed pursuant to Sections 138d et seq. of the German Fiscal Code (AO), according to which **shares within the meaning of Section 17 of the German Income Tax Act (EStG)** were **transferred into a fund structure as a precautionary measure** to avoid triggering the provisions of Section 6 of the German Foreign Tax Act (AStG).
- Shares in an investment fund or SIF are subject **to exit tax** if the investor was subject to **unlimited tax liability** for “seven out of twelve” years (Sections 19 (3), sentence 3, and 49 (5), sentence 3, of the Investment Income Tax Act (InvStG) in conjunction with Section 6 (2) of the Foreign Tax Credit Act (AStG)).
- **Relevance: in particular ETFs/public funds**
 - 1% per fund or
 - acquisition costs of at least EUR 500,000.

Establishment of a permanent establishment

BFH, Dec. 18, 2024 – I R 47/21

Summary of the Facts

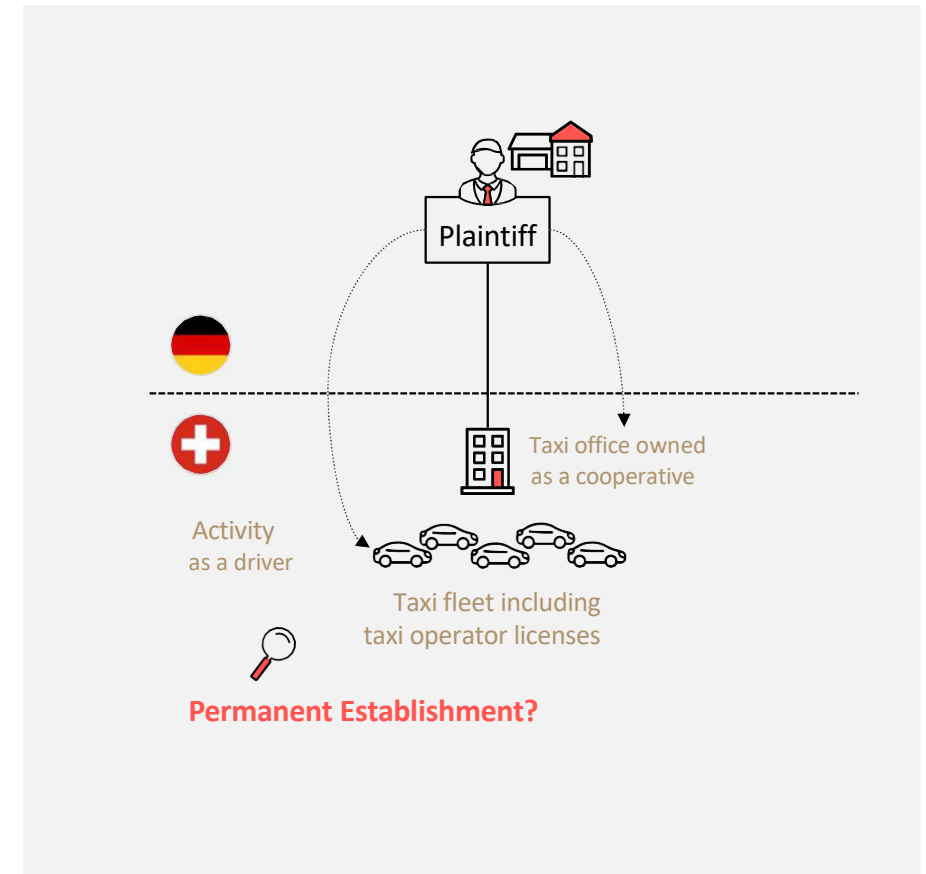


- The plaintiff operated a **taxi company** in Switzerland.
- In the offices of a Swiss taxi cooperative (“Taxibüro”), he had permanent access to a **desk** equipped with a computer and telephone, as well as a **lockable filing cabinet** (used to store business documents), for his office work.
- Tax Authority: **No permanent establishment in Switzerland**; the plaintiff allegedly managed the business from his home in Germany.
- The plaintiff disputes this, stating that he spends eight to ten hours a day in the taxi and also handles his **office work in the taxi** or at **the taxi office**. His **employees** are registered in Switzerland.

Related issue



- Does the taxi office shared by the cooperative constitute a permanent **establishment** within the meaning of Art. 5 (1) of the DTA with Switzerland?
- In addition: Does this also apply to the plaintiff’s taxi and **underground parking space**?



Establishment of a permanent establishment

BFH, Dec. 18, 2024 – I R 47/21

Guidance on Solutions and Practical Application

Permanent establishment (Section 12, Sentence 1 of the German Fiscal Code):

Fixed business premises or equipment, serving the activities of the enterprise, power of disposal (unwritten)

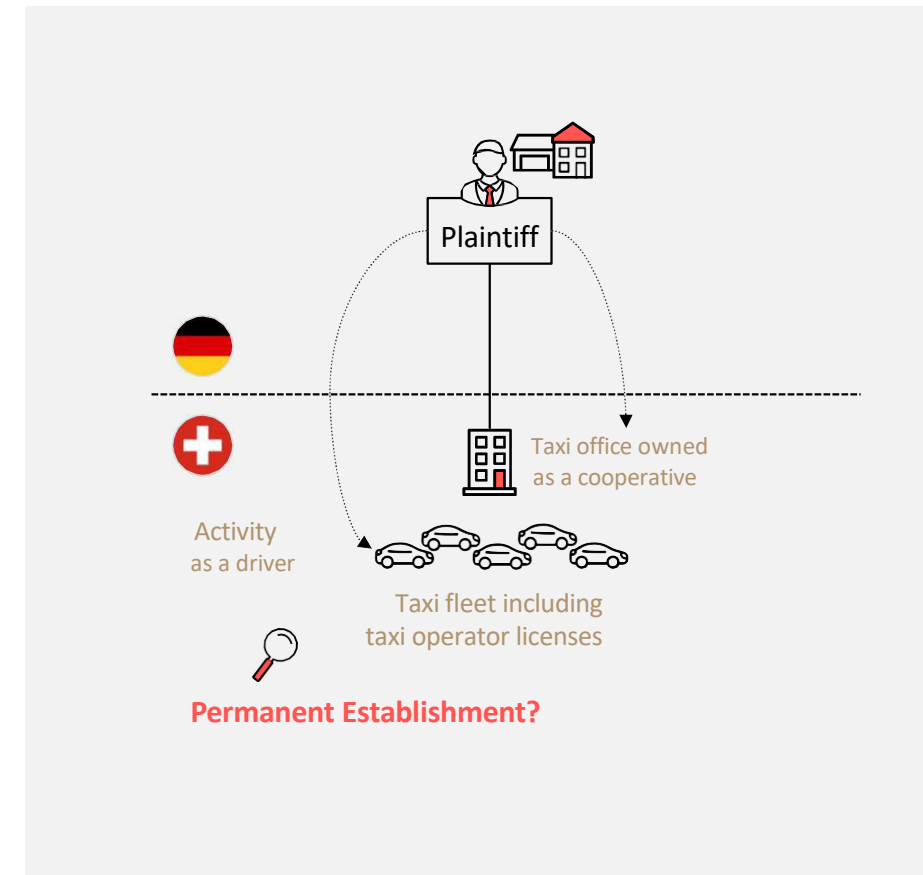
Permanent establishment (Art. 5 (1) OECD Model Tax Convention):

Fixed place of business, Conduct of business activities, authority to manage (unwritten)

- **The permanent establishment** consists of **the office space** at the taxi dispatch center that **is shared** by the plaintiff (BFH, Dec. 18, 2024 – I R 47/21, DStR 2025, 1013, para. 32).
- The mobile **office container provided to the plaintiff for his sole use**, as a structure with restricted access, is an **indication of the existence of permanent control over the office space** (ibid., para. 32).
- The plaintiff did **not** perform **exclusively preparatory or auxiliary activities** within the meaning of Article 5 (3)(e) of the Double Taxation Agreement with Switzerland in the office space.



Proper and comprehensive documentation of the circumstances of the individual case is crucial.



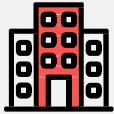
Draft BMF letter dated February 13, 2026

- **Draft BMF letter** dated February 13, 2026, on the administrative principles for the **definition and establishment of permanent establishments** in **domestic and international tax law**.
- **Clarifications and detailed adjustments** to the previous administrative interpretation.
- Domestic law provides a **more specific definition of the general elements of § 12 AO** required to establish a permanent establishment:
 - **permanent business establishment**
 - In **individual cases**, an **office corner with a desk** or a **laptop** is sufficient.
 - **Local and temporal permanence**
 - **directly serving the business**
 - **Control by the company** (unwritten)
- **The interplay among the individual elements of the offense** must be considered as part of the **overall assessment of the specific case**.
- Pursuant to § 12, sentence 2, no. 1 of the German Fiscal Code (AO), a **permanent establishment exists at least at the location of the business management**.

Administrative Principles for Business Premises

Examples

Third-Party Premises



- **Third-party premises** serve the taxpayer's business only if the taxpayer carries out his **own business activities** on those premises.

Management companies



- Engaging a **management company** may **constitute a permanent establishment**.
- This applies in particular if **the taxpayer conducts their own business activities** on the company's premises or if there is **an identity between the management bodies**.

Working from home



- **Generally, no permanent establishment** due to the taxpayer's lack of control.
- **Separate assessment** applies when **management functions** are performed (management permanent establishment).
- **OECD: 50% threshold and business purpose** (according to a static interpretation of the treaty, applicable only to future DTAs) not necessarily applicable in Germany

Influencers



- **Influencers with income from profits** have at least one **permanent establishment for business management**.
- **Locations used only temporarily or irregularly**, however, did not constitute a permanent establishment due to a lack of temporal roots. **They do not constitute a permanent establishment.**

Exit Taxation through the Transfer of Assets to a Foreign Permanent Establishment

Federal Fiscal Court, March 26, 2025 – I R 5/24 (I R 99/15)

Facts

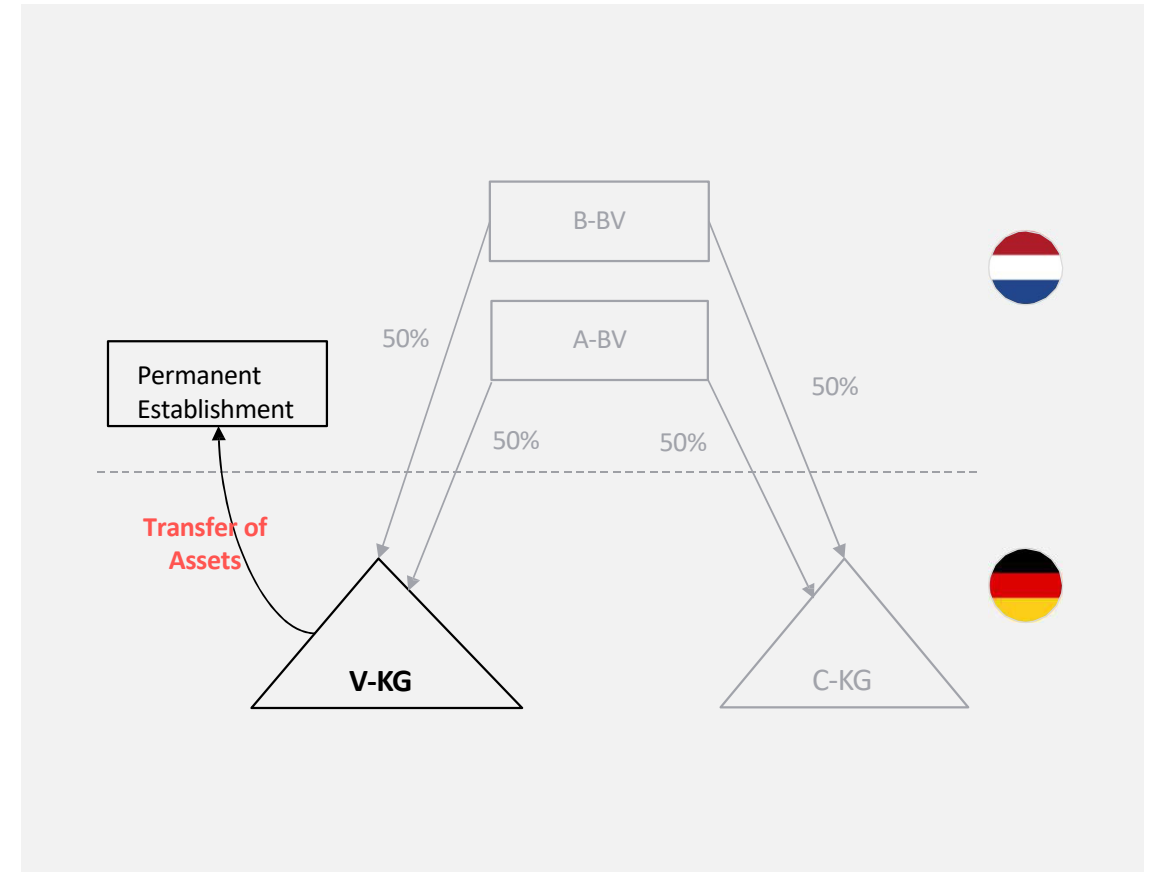


- V-KG transferred its intangible assets (patents, trademarks, utility models) to a **Dutch permanent establishment**.
- The tax office (fictitiously) recognized a **withdrawal** (Section 4 (1), sentences 3 and 4 of the Income Tax Act) because Germany lost its right of taxation and assessed an **exit tax**.

Related Question



- Does the **transfer of an asset** from a domestic to a foreign permanent establishment constitute a taxable withdrawal (“divestiture”)?



Exit Taxation through the Transfer of Assets to a Foreign Permanent Establishment

Federal Fiscal Court, March 26, 2025 – I R 5/24 (I R 99/15)

Decision

- The **transfer** of intangible assets to a foreign permanent establishment triggers, pursuant to § 4 (1) sentence 4 EStG as amended by the 2010 Annual Tax Act, triggers the legal consequences of **the deemed withdrawal** under § 4 (1) sentence 3 EStG.



“bb) However, with the insertion of § 4 (1), sentence 4, of the Income Tax Act (EStG) by the 2010 Tax Act (JStG), the legislature has unequivocally established that the transfer of an asset previously attributable to the taxpayer’s domestic permanent establishment to a foreign permanent establishment—regardless of any treaty-based exemption of the foreign permanent establishment’s profits—is to be considered a case of application (“...is particularly the case when...”) of § 4 (1) sentence 3 EStG as amended by the SEStEG. In view of this intent of the legislature, which is clearly discernible from the wording of the provision, a re-examination of the requirements of sentence 3 is not necessary in cases where the facts satisfy the criteria of § 4 (1) sentence 4 EStG as amended by the JStG 2010 (see also Brandis/Heuermann/Drüen, § 4 EStG margin note 487; Reddig in Herrmann/Heuer/Raupach, § 4 EStG margin note 242; Musil, Finanz-Rundschau --FR-- 2011, 545, 549). The fact that § 4 (1) sentence 4 EStG, as amended by the JStG 2010, is intended—according to the explanatory memorandum to the draft law (BTDrucks. 17/3549, p. 15) is intended to “clarify the main application of § 4 (1) sentence 3 EStG by means of a standard example” does not change this—contrary to the view of the appeal (different opinion: Gosch, Internationale Wirtschaftsbriefe 2012, 779, 784 et seq. and BFH-PR 2015, 296, 298; Schnitger, “Unraveling Tax Law, 2013, p. 25; Kessler/Philipp, German Tax Law --DStR-- 2012, 267, 270).”

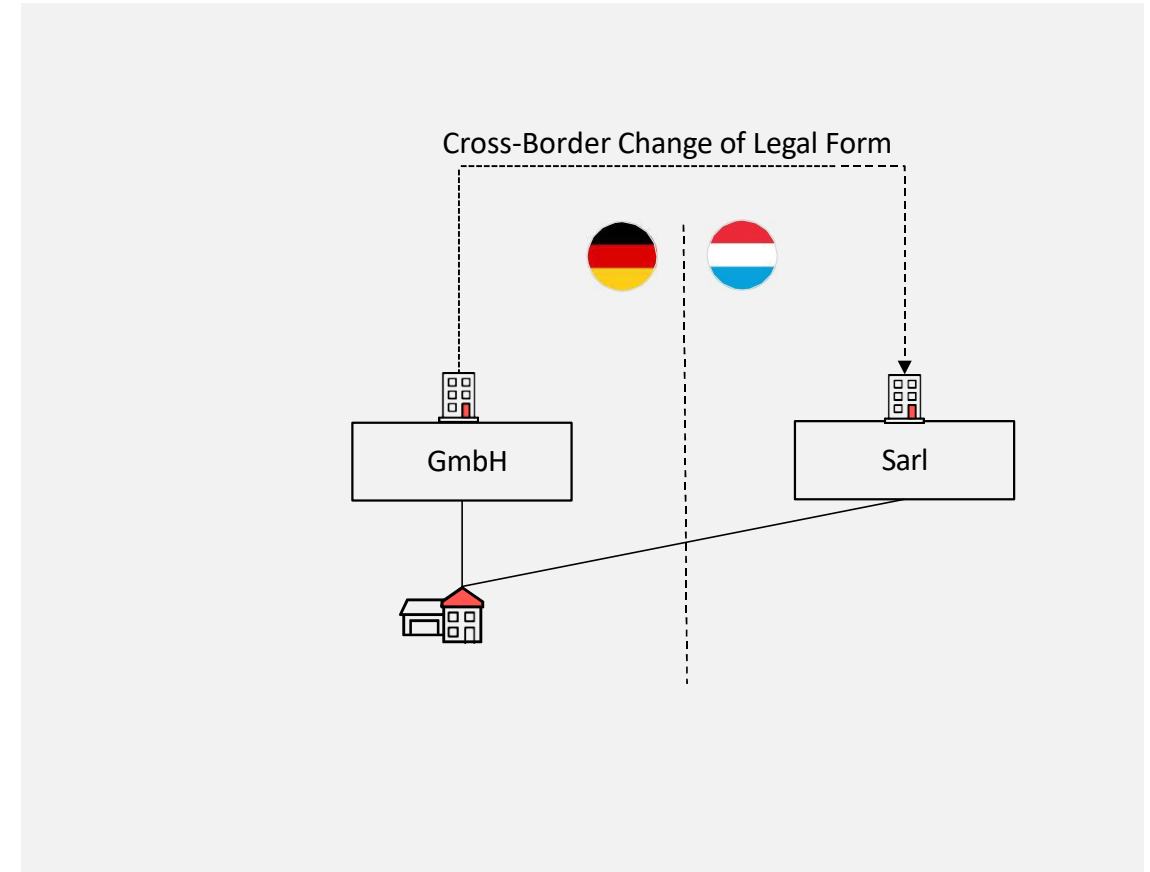
- **Important:** The transfer of assets to a foreign permanent establishment (Section 4 (1), sentence 4 of the German Income Tax Act) is intended to trigger the “disengagement” tax treatment regardless of whether there is an actual limitation or exclusion of German taxing rights.
 - **Note:** In the event of the relocation or restructuring of real estate companies, real estate located in Germany could be subject to exit taxation, despite the principle of location, according to this sentence

Cross-border change of legal form of a corporation

Unbundling of Real Estate



- A **GmbH based in Germany** owns a **property located in Germany** that it leases out. Its registered office and place of management are located in Germany.
- The shareholders intend to carry out a **cross-border conversion into a Luxembourg Sarl**. The registered office and place of management will henceforth be located in Luxembourg.
- As a result, there would no longer be a permanent establishment in Germany (avoidance of trade tax), so the German real estate would be **attributable to the permanent establishment in Luxembourg**.
 - According to the Federal Fiscal Court (BFH), in such a scenario, **the property would be decoupled pursuant to Section 4 (1), sentence 4 of the Income Tax Act (EStG)**.
 - The fact that, under the **principle of location**, Germany would retain the right to tax current income and capital gains, and that German tax jurisdiction would therefore neither be limited nor excluded (Section 4 (1), sentence 3, of the Income Tax Act), would likely be **irrelevant**.

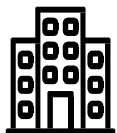


Withholding Tax and Treaty Override

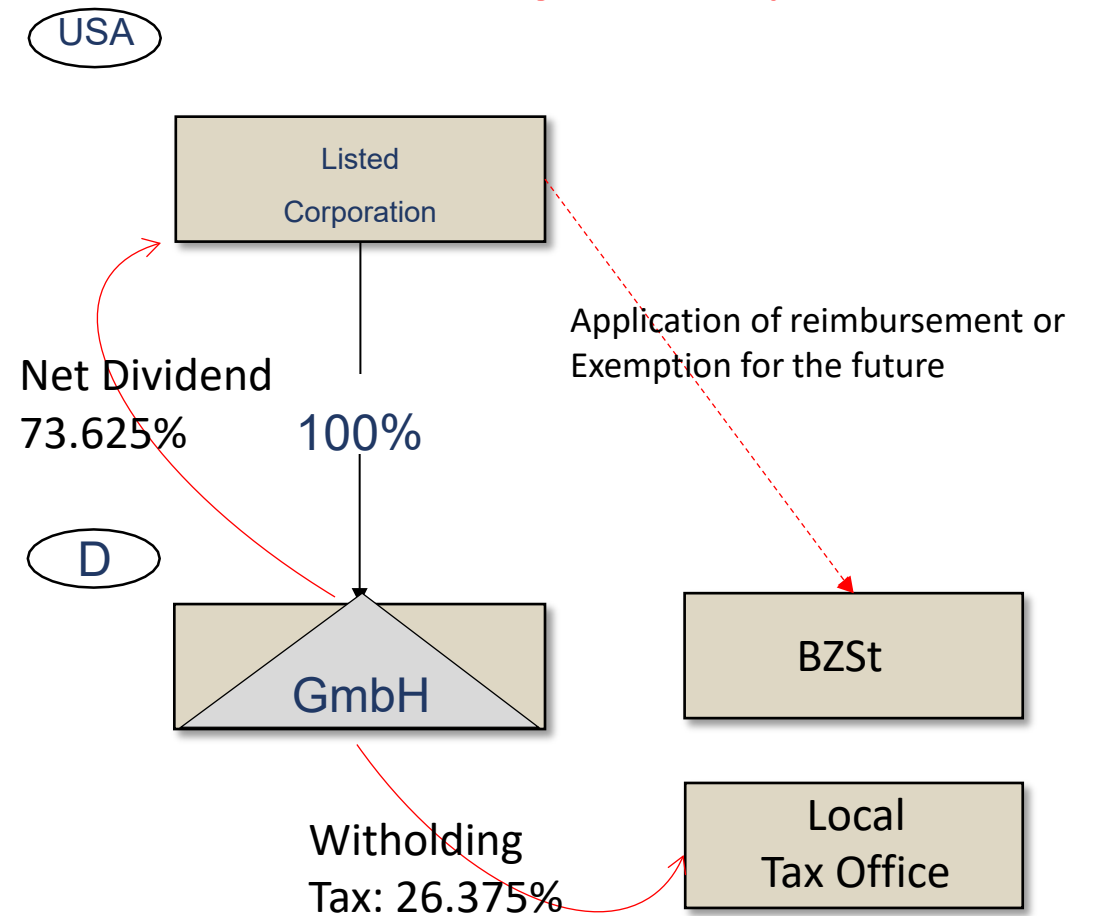
Central German Tax Office (BZSt) changed its reimbursement of withholding tax policy



- A **GmbH based in Germany** is treated as disregarded entity from the U.S. point of view („check the box“). The distribution is treated as non taxable from the U.S. point of view. The GmbH would be treated as permanent establishment in Germany.
- Under the treaty, the withholding tax is zero (Art. 10 Para 3)
- The GmbH has to withhold 26.375% of the gross dividend and transfer the withholding tax to ist local tax office.
- The net dividend amounts to 73.625%.
- If the U.S. parent company either applies for the reimbursement or for an exemption for the future, the BZSt will not grant that for three different reasons:
 - § 50d para. 14 EStG: Analogue to German Check the box rules
 - § 50d para. 11a EStG: Allocation conflict.
 - Art. 1 para. 7 DTT-U.S.A. The corporation is not an eligible person under the treaty.



⇒ *Please note the German Supreme Court has held in 2025 that a treaty override is legitimate if is explicitly stated in the law and is an exception.*



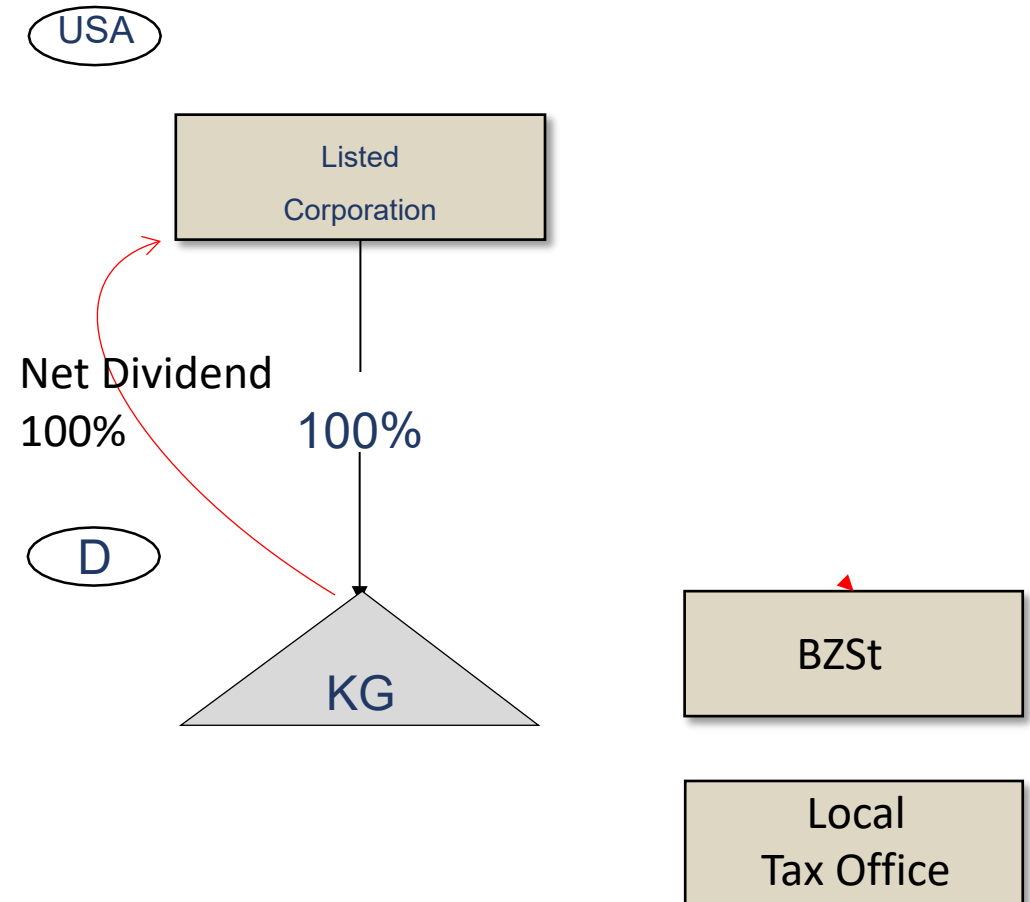
Withholding Tax and Treaty Override

Central German Tax Office (BZSt) changed its reimbursement of withholding tax policy

Solution:



1. Transformation of the GmbH in a KG (limited partnership) which can easily be perfected tax neutral
 2. The retained earnings will be treated as distributed, which could lead to an additional tax leakage of 26.375%.
 3. In the future no withholding tax issues since the distributions from a KG are withdrawals which do not trigger any withholding taxes
 4. M&A friendly structure since acquisition costs can be written off at the KG level and any financing costs related to acquiring or operating the KG are tax deductible due to the tax transparency of the KG in Germany at the KG level, even if the expenses occur at the parent company level.
- ⇒ As a rule German companies and US companies should always be treated as transparent in both countries



Disclaimer

Disclaimer

- The presentation is based on the legal status as of April 2026.
- This generic presentation is intended primarily as preliminary information and to establish the facts and is not legally binding in its draft form.
- The presentation currently contains tax-optimized proposals. Whether the requirements for a structuring option are met or whether the requirements still need to be met in detail must be examined in a second step. In individual cases, the tax consequences may differ significantly from the legal consequences presented. This is particularly the case for even minor deviations from the facts. The presentation is therefore deliberately generic, i.e., general, and serves solely to provide information about possible structuring solutions.
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BEST STEUERBERAT 2016 GHM GmbH Steuerberatungsgesellschaft Internationales Steuerrecht Handelsblatt Handelsblatt · 12.02.2016 Im Test: 1.500 Steuerberater aus den 10 größten dt. StB Kooperationspartner S.W.I. Finance	BEST STEUERBERAT 2017 GHM GmbH Steuerberatungsgesellschaft Köln Handelsblatt Im Test: 1.372 Steuerberater handelsblatt.com · 17.03.2017	BEST STEUERBERAT 2018 GHM GmbH Steuerberatungsgesellschaft Standort: Köln und München Kategorie: Internationales Steuerrecht und Erbschaft/Schenk Handelsblatt im Test: 3.704 Steuerberater Handelsblatt · 3/2018	Handelsblatt BEST Steuerberater 2019 GHM GmbH Steuerberatungsgesellschaft Köln/München Internationales Steuerrecht Im Test: 4.129 Steuerberater Partner: S.W.I. Finance Handelsblatt · 11.03.2019	Handelsblatt BEST Steuerberater 2020 GHM GmbH Steuerberatungsgesellschaft München und Köln Internationales Steuerrecht Unternehmensnachfolge Im Test: 4.189 Steuerberater Partner: S.W.I. Finance Handelsblatt · 01.04.2020	Handelsblatt BEST Steuerberater 2021 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht M&A, Konzernsteuerrecht Steuerrekürs Im Test: 4.253 Steuerberater Partner: SWI Finance Handelsblatt · 24.03.2021	Handelsblatt BEST Steuerberater 2022 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht Unternehmensnachfolge Branche: Ärzte und Pflege Im Test: 4.303 Steuerberater Partner: SWI Finance Handelsblatt · 23.03.2022	Handelsblatt BEST Steuerberater 2023 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht Unternehmensnachfolge Branche: Ärzte / Pflege Im Test: 4.208 Steuerberater Partner: SWI Finance Handelsblatt · März 2023	Handelsblatt BEST Steuerberater 2024 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht Unternehmensnachfolge Im Test: 4.126 Steuerberater SWI Finance 14.03.2024	Handelsblatt BEST Steuerberater 2025 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht Unternehmensnachfolge Im Test: 4.109 Steuerberater SWI Finance 19.03.2025	Handelsblatt BESTE Steuerberater 2026 GHM GmbH Steuerberatungsgesellschaft Köln / München Internationales Steuerrecht Unternehmensnachfolge Im Test: 4.036 Steuerberater SWI Finance 18.03.2026
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AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2018	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2019	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2020	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2021	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2022	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2023	AUSGEZEICHNET TOP Steuerberater FOCUS-MONEY-TEST 2024	AUSGEZEICHNET TOP Steuerberater 2025 FOCUS-MONEY-TEST
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Accolades

GHM GmbH

■■■ Steuerberatungsgesellschaft

TOP STEUERKANZLEI 2014	TOP STEUERKANZLEI 2016	TOP STEUERKANZLEI 2019 INTERNATIONALE STEUERBERATUNG UMWANDLUNG, UMSTRUKTURIERUNG UND M&A	TOP STEUERKANZLEI 2020	FOCUS	FOCUS	FOCUS	FOCUS	FOCUS	FOCUS
FOCUS	FOCUS	FOCUS	FOCUS	TOP STEUERKANZLEI 2021	TOP STEUERKANZLEI 2022	TOP STEUERKANZLEI 2023	TOP STEUERKANZLEI 2024	TOP STEUERKANZLEI 2025	TOP STEUERKANZLEI 2026
GHM GmbH Steuerberatungsgesellschaft Internationale Steuerberatung	GHM GmbH Steuerberatungsgesellschaft Internationale Steuerberatung	DEUTSCHLANDS GRÖSSTE STEUERKANZLEIEN IM VERGLEICH IN KOOPERATION MIT statista FOCUS-SPEZIAL 01 2019	DEUTSCHLANDS GRÖSSTE STEUERKANZLEIEN IM VERGLEICH FOCUS 15 2020	FOCUS 14/2021 IN KOOPERATION MIT FACT" „FIELD	FOCUS 4/2022 IN KOOPERATION MIT FACT" „FIELD	FOCUS 4/2023 IN KOOPERATION MIT FACT" „FIELD	FOCUS 4/2024 IN KOOPERATION MIT FACT" „FIELD	FOCUS 4/2025 IN KOOPERATION MIT FACT" „FIELD	FOCUS 4/2026 IN KOOPERATION MIT FACT" „FIELD

brandeins /thema b* 2020 Heft 14 Beste Steuerberater & Wirtschaftsprüfer GHM GMBH Steuerberatungsgesellschaft	brandeins /thema b* 2021 Heft 18 Beste Steuerberater & Wirtschaftsprüfer GHM GMBH Steuerberatungsgesellschaft
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WirtschaftsWoche

TOP
Steuerkanzlei
für Unternehmens-,
Konzernbesteuerung
und internationales
Steuerrecht

GHM GmbH
Steuerberatungsgesellschaft

2021

In Kooperation mit:
Handelsblatt Research Institute
Ausgabe 35/2021

WirtschaftsWoche

TOP
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Internationales
Steuerrecht

2022

GHM GmbH
Steuerberatungsgesellschaft

In Kooperation mit:
Handelsblatt Research Institute
Ausgabe 31/2022

FAZ.-INSTITUT

TOP
STEUERBERATUNGS- UND
WIRTSCHAFTSPRÜFUNGS-
KANZLEIEN
DEUTSCHLANDS

2024

statista 10 / 2024 Basis: Experten- und Kundenbefragung

Capital

HEFT Dezember 2024

**Top Steuerberatungskanzlei
2025**

Internationales Steuerrecht
GHM GmbH
Steuerberatungsgesellschaft

Umfrage unter
Wirtschaftsprüfungskanzleien und
Steuerberatungskanzleien

Quelle: statista
GÜLTIG BIS: 11/25

Vita Dr. Peter Happe



StB Dr. rer. pol. **Peter Happe**, graduate in business administration, is a partner at GHM GmbH Steuerberatungsgesellschaft, Cologne. Dr. Happe is a member of the advisory board of the Frankfurt-based fund initiator HABONA. Previously, he was a member of the executive board and CFO of a real estate private equity fund in Zurich, a partner in the Frankfurt office of the US law firm Dewey Ballantine, and a tax advisor at the international law firm Clifford Chance, where he also worked as a CPA in New York. From 1993 to 1997, he was a research assistant to Prof. Dr. Dr. h.c. Baetge at the University of Münster. Dr. Happe is a permanent lecturer at IWW and has also lectured at the Federal Finance Academy, Euroforum, Management Circle, IIR, and as a lecturer at the Technical University of Dresden and Zeppelin University in Friedrichshafen.

- Exam in Business Administration in 1993 in Münster
- Doctorate (PhD. in business administration) in 1997 in Münster
- Tax advisor exam in 1998
- Certified Public Accountant (State of New York) in 2000
- Specialist advisor for international tax law (Federal Chamber of Tax Advisors) in 2010
- Specialist advisor for corporate succession (DStV) in 2011
- Specialist advisor for healthcare (DStV) 2016
- Specialist advisor for restructuring and M&A (IFU) 2025

His main areas of expertise include advising high net worth individuals and large and medium-sized companies and groups on all aspects of tax law, in particular international tax law and criminal tax law, accounting and group accounting issues in accordance with the German Commercial Code (HGB), IFRS, and US GAAP, but above all advising on national and international M&A transactions, corporate restructuring, structured financing, real estate investments, transfer pricing documentation, and succession planning.

Dr. Peter Happe is a native speaker of German and is fluent in business English.

Contact Details

Contact Details

GHM GmbH
■■■ Steuerberatungsgesellschaft

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