AQUASANDS

THE WOLF SERIES · Nº 02

Live here. Bill there.

The residence and company playbook: why a company abroad changes nothing on its own, the three tests your government really applies, and the order that makes it work.

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Stop being a pigeon.
Join the wolves.

BEFORE YOU READ

Where you live decides. Not where you register.

Every year, thousands of founders open a company abroad and keep paying full tax at home. Not because the company was wrong, but because they set it up in the wrong order. This playbook gives you the right order.

WHAT YOU GET

- The three tests that decide where you pay personal tax.
- The test that decides where your company pays.
- Four residence routes compared: UAE, Georgia, Paraguay, Switzerland.
- A clean exit checklist, and the traps that reopen the file.
- A scorecard for your own situation.

WHAT IT IS NOT

- Not a do-it-yourself kit. Your exit depends on your home country, your family and your assets, and that is decided one to one.
- Not tax or legal advice. It is general information, stated as at November 2026.
- Not a promise of savings. If staying is the right answer, we say so.

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THE MYTH

01

A company abroad does not move you.

A foreign company does not change your personal tax position. Only your residence does, and residence cannot simply be declared.

WHAT A FOREIGN COMPANY CHANGES

- Where the company is registered and files.
- The corporate tax rate on profits it genuinely earns there.
- Where it banks and how clients see it.

WHAT IT DOES NOT CHANGE

- Your home, your family, your 183 days.
- Your centre of vital interests.
- Your government's right to tax you, and to look at a company you control.

THE WOLF ORDER

1. Decide where you will really live. 2. Obtain the residence. 3. Form the company where it fits the business. 4. Open the bank account. Reverse it and you pay twice: once to build, once to repair.

Why pigeons get caught

The pigeon keeps his flat, his family and his clients at home, invoices through a company abroad, and pays himself from it. Three problems at once: he is still resident at home, the company is managed from home, and the profits may be pulled back into his home tax return.

DECIDED ON THE CALL

Whether moving makes sense for you at all, and if so where. Sometimes the right structure is at home, and we will tell you. Book the 45-minute call →

THE THREE TESTS ON YOU

02

Home, days, interests. Your government checks all three.

Tax residence rests on real presence. An address or a residence permit is not enough on its own.

TEST 1 · HOME

Home

where you have a permanent home available

A flat you keep at home, even empty, can anchor you there. A hotel abroad does not anchor you anywhere.

TEST 2 · DAYS

183 days

the usual presence threshold in a year

Many countries count days. Some count over a calendar year, some over any twelve months. Keep proof of every night.

TEST 3 · INTERESTS

Centre

of vital interests: family, work, assets

Where your spouse and children live, where you work, where your money sits. This test often decides alone.

When two countries both claim you

Tax treaties settle the conflict in a fixed order, the same in most treaties:

01 **Permanent home** available to you.

02 If both, your **centre of vital interests**.

03 If unclear, your **habitual abode**: where you actually spend your time.

04 Then your **nationality**, then agreement between the two administrations.

KEEP A DAY LOG FROM DAY ONE

Boarding passes, a lease, utility bills, a local phone, school enrolment. When your government asks where you lived, the answer is a file, not a feeling.

DECIDED ON THE CALL

How your home country counts days, which ties weigh most there, and whether a treaty exists with your destination. Check your home rules →

THE TEST ON YOUR COMPANY

03

A company lives where it is run.

A company is not only resident where it is registered. In most systems it can also be resident where it is effectively managed.

PLACE OF EFFECTIVE MANAGEMENT

If the key decisions are really taken in your country of residence, from your kitchen table, that country may treat the company as its own and tax it there. The registration abroad does not stop it.

CONTROLLED FOREIGN COMPANY RULES

Many countries also tax their residents on the profits of low-taxed companies they control, even when nothing is distributed. A company abroad owned by a resident at home is exactly what these rules target.

What makes a company genuinely foreign

- [ ] Decisions taken where the company is, by the people who run it there.
- [ ] Substance proportionate to the activity: an address, and where required, people and premises.
- [ ] Contracts signed, invoices issued and bank operated consistently from there.
- [ ] Board minutes and records kept where the company is.
- [ ] You, its manager, living where it is, or a real management team there.

THE SIMPLE VERSION

When **you** move, the company can follow you. When you stay, it usually stays with you, whatever its registration says.

DECIDED ON THE CALL

The substance your company needs where you register it, and how to run it so it stays foreign.

Plan your substance →

FOUR RESIDENCE ROUTES

04

Four ways to live somewhere that works.

Four routes we run often, each with a different logic. None is best for everyone.

ROUTE	THE LOGIC	WHAT IT ASKS OF YOU	AQUASANDS
United Arab Emirates	0% personal income tax. Two-year investor visa for you and your family, through a company.	Real life in the UAE; 183 days for a tax residence certificate in the usual case.	€3,290 visa, ID and renewal
Georgia	As a tax resident on small business status: 1% tax on turnover up to GEL 500,000.	183 days, on-site registration, a declared legal address.	€2,790 residence
Paraguay	Territorial taxation: foreign-source income is not taxed in Paraguay.	Genuine presence for the tax residence certificate. Timelines long and unpredictable.	€2,490 permanent residence
Switzerland	Expenditure-based taxation, with a cantonal ruling negotiated before arrival.	Living in Switzerland, no gainful activity in Switzerland.	On quote

€2,490

starting price of our residence and tax residence service, depending on the country, government fees included

45 min

scoping call to find which route holds for your case, and which would not

DECIDED ON THE CALL

Your route. It depends on your passport, your family, your activity and how much time you will truly spend there. We also tell you the routes that would fail for you, and why. **Find your route →**

LEAVING CLEANLY

05

The exit is a project, not a flight.

Getting the new residence is half the work. The other half is closing the doors at home so your government has nothing to hold on to.

Before you leave

- [ ] Find out which exit rules your home country applies to people who leave, especially on shares and unrealised gains.
- [ ] Decide what happens to your home: sold, rented out, or kept, and what that signals.
- [ ] Plan the move of your family and your main work.
- [ ] Prepare the documents of your new residence before the date.

When you leave

- [ ] Deregister where your home country requires it.
- [ ] File the departure-year tax return correctly.
- [ ] Move your main bank relationship and update your address everywhere.
- [ ] Start your day log on the first night abroad.

After you leave

- [ ] Keep under the day threshold at home, every year, with proof.
- [ ] Run your company from where you live, not from where you used to live.
- [ ] Collect your tax residence certificate each year in your new country.

DECIDED ON THE CALL

Your departure calendar and the exit rules that apply to you. This is the part a template cannot do: it depends on what you own and where. **Plan your exit →**

THE PAIRING

06

Where you live, where you bill: the pair must make sense.

The residence and the company are one design. Some pairs are coherent, some invite questions. Here is the logic, not the answer.

IF YOU LIVE IN	THE COMPANY USUALLY SITS	WHY IT HOLDS
The UAE	In the UAE: a free zone for international clients, mainland for the local market.	You live and manage where the company is. Substance follows naturally.
Georgia	As a Georgian sole trader on small business status, or a Georgian company for larger activity.	The 1% tax on turnover is built for residents running their own activity there.
Paraguay	Depending on clients and banking: local, or abroad with a clear management story.	Territorial taxation looks at the source of income, so the source must be documented.
Anywhere, with clients in the US	Sometimes a US LLC alongside, for payments and credibility.	Only if its federal and reporting side is handled every year.

THE TEST OF A GOOD PAIR

Explain your structure in one sentence to a banker. If you can say **"I live here, I run the company from here, my clients pay it there"** and every document agrees, the pair holds.

DECIDED ON THE CALL

Your pair. We design residence and company together, with one firm quote and the executing party named before you sign. Design your structure →

THE SEVEN TRAPS

07

Where pigeons lose their money.

01 **Company first, residence never.** The most common and the most expensive. Nothing changes for your personal tax.

02 **Keeping the family home "just in case".** An available home and a family left behind can keep you resident at home on their own.

03 **Counting days loosely.** "About five months" is not a number. Your government will count for you.

04 **Running the company from home.** Effective management at home can make the company resident at home too.

05 **Ignoring exit rules.** Some countries tax unrealised gains on shares when you leave. Discover it before, not after.

06 **A permit without a life.** A residence card with no home, no presence and no ties is a souvenir, not a tax residence.

07 **A pair nobody can explain.** If your banker cannot follow it, your government will not accept it.

THE PATTERN

Every trap is the same mistake: treating residence as paperwork. Residence is where your life is. The paperwork only proves it.

YOUR SCORECARD

08

Ready to move, or about to pay twice?

Tick honestly. This is for you, not for us.

I know where I will genuinely live, with my family and my work.	Yes ☐	No ☐
I can spend the required days there, and prove them.	Yes ☐	No ☐
I know what happens to my home at home.	Yes ☐	No ☐
I know my home country's exit rules for someone like me.	Yes ☐	No ☐
I know whether a tax treaty exists between the two countries.	Yes ☐	No ☐
My company will be run from where I live.	Yes ☐	No ☐
I can explain my structure to a banker in one sentence.	Yes ☐	No ☐
I have a two-year budget for residence, company and upkeep.	Yes ☐	No ☐

8 YES

You are ready. A call turns it into a firm quote and a calendar.

5 TO 7 YES

Close. The gaps are usually the exit rules and the days: that is what we map.

4 OR FEWER

Do not move or form anything yet. Book the call first; it may save you the whole budget.

BRING THESE TO YOUR CALL

Write down every "No" above. They are the agenda of your 45 minutes, and the answers you leave with.

WHAT THIS PLAYBOOK LEAVES OUT ON PURPOSE

The map is yours. The route is personal.

You now know the tests and the order. What a document cannot do is apply them to your passport, your family, your assets and your clients. These are the decisions we make with you:

- Whether moving makes sense for you, and where.
- Your residence route, and the routes that would fail for you.
- Your exit calendar and the home rules that apply to you.
- The company that pairs with your residence, and its substance.
- Your two-year budget, as a firm quote with government fees included.

BOOK YOUR 45-MINUTE CALL

aquasands.net/request

At the end, we tell you what we would do in your place, including building nothing at all or staying where you are. The answer is often no, and we would rather say so before billing anything.

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French and English

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