



## Fanny Combourieu

Partner

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Fanny Combourieu has over 20 years of experience in tax, particularly of private equity transactions, acquisitions and disposals of companies, restructurings, real estate investments and real estate funds structuring.

She has vast experience in all areas of personal tax for high-net-worth individuals, in particular regarding their real estate investments in France. She also has extensive experience in tax audits and litigation.

Fanny's clients include private equity and real estate funds, banks, financial institutions, corporates, family offices and high-net-worth individuals

### LANGUAGES SPOKEN

- French
- English

### EXPERIENCE

Fanny has worked on the tax structuring for numerous private equity funds such as:

- Advising Real IS in the context of numerous transactions:
  - the acquisition of office buildings in Lyon (located Quai Perrache – Convergence buildings, and one office building ) and Marseille (located bd de Dunkerque – the Grand Large buildings)
  - The acquisition of the Faubourg asset (share deal)
  - The sale of the Hoche asset (share deal)
- Advising Union Investment in the context of the acquisition of the hotel operated by Melia in La Défense and sale of numerous assets (Le Prime, Capella, Arc de Seine, Altaïr, Aile Sud, Le Cap, Le Wilson...).
- Advising Barings in the context of multiple acquisitions:
  - Nanteuil – Acquisition of 23,000 sqm grade A logistics warehouse in Nanteuil-le-Haudouin, pursuant to a forward contract ("vente en l'état futur d'achèvement")

### RELATED SERVICES

- Tax
- Private Equity

### RELATED SECTORS

- Financial Services
- Real Estate

### LANGUAGES SPOKEN

French English

- Canopy - Acquisition of 6,500 sqm grade A office space in Pré-Saint-Gervais, in the Paris' suburbs, pursuant to a forward contract ("vente en l'état futur d'achèvement")
- Savigny - Acquisition of a 22,500 sqm grade A warehouse in Savigny-le-Temple
- Advising Cain International on the acquisition of its first office building in France through a JV with the asset manager FREQ Asset Management.
- Advising Harbert Management Corporation on the acquisition and development of a logistic warehouse on a plot of land located near Lyon.
- Advising AXA on the acquisition of "Dolphin Square", the largest private rented residential complex in London for AXA investors located in different jurisdictions.
- Advising Ares on the acquisition of the shares of a French SPPICAV (OPPCI) owning indirectly a portfolio of six logistics/warehouse assets from OJIREL managed by ALDERAN.

## CREDENTIALS

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### Professional Qualifications

- Avocat admitted to the Paris Bar

### Prior Experience

Before joining DLA Piper, Fanny was a partner at several high-profile international firms, based in Paris..

### Recognitions

- *Best Lawyers* – Tax Law – 2017-22
- *Legal 500* – Private Equity Tax - Leading Individual – 2021
- *Who's Who Legal* - Expert in Corporate Tax in France
- 'Fanny Combourieu is recognised for her advice on the tax elements of acquisitions, sales and investments, frequently assisting investment companies, asset managers and private equity firms. One interviewee describes her as being "excellent." *Chambers Europe*, 2021
- 'Fanny is praised for her "strong client focus" and "tactical approach" to mandates.' *Chambers Europe*, 2020

### Education

- Université Paris-Sud Postgraduate Studies (DESS), International Tax Law, 1994 - 1995
- HEC Paris, Major in Tax and Law, 1992 - 1995

## INSIGHTS

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### Publications

#### Companies facing Covid-19: What are the tax measures?

26 March 2020

In order to reckon with the impact of the coronavirus epidemic on the economic activity, and in accordance with the announcements made by the President of the French Republic on 12 et 16 March 2020, the French Tax Authorities have taken exceptional measures in order to support businesses.

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## France publishes transposition order to implement EU DAC6 directive into domestic law

4 December 2019

On 22 October 2019, the French government published Ordinance No. 2019-1068 of 21 October 2019 (the Ordinance) regarding the mandatory automatic exchange of tax information in relation to reportable cross-border arrangements. This article provides insight into the Ordinance.

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- "DAC 6 : Beaucoup de travail pour rien ?", *Les Echos Capital Finance*, February 2021
- "Loi de Finances pour 2021", *DLA Piper Insights*, January 2021
- "Les entreprises face au Covid-19 : quelles mesures fiscales?", *DLA Piper Insights*, March 2020
- "Loi de Finances pour 2020", *DLA Piper Insights*, February 2020
- "Déclaration des dispositifs fiscaux potentiellement agressifs (DAC 6) : l'ordonnance de transposition est parue", *DLA Piper Insights*, October 2019
- "Loi de finances pour 2019 - Mesures fiscales intéressant les entreprises", *DLA Piper Insights*, January 2019
- "Loi de finances pour 2019 - Mesures fiscales intéressant les particuliers", *DLA Piper Insights*, January 2019

## Events

### Previous

#### IPEM 2021

8-9 September 2021

IPEM 2021

Paris

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#### International Private Equity Market 2020

28-30 January 2020

IPEM 2021

Paris

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- Webinar: *Loi de finances, ATAD 2, DAC6 : quel environnement fiscal en 2021?* January 2021

## NEWS

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### DLA Piper advises Abenex on the acquisition of a minority stake alongside the founders of the capital and voting rights of HTDS in a primary LBO

15 September 2021

DLA Piper has advised Abénex, a major player in the mid-market private equity market in France, on the acquisition of a minority stake alongside the founders of the capital and voting rights of HTDS, a company specialized in the distribution and maintenance of high-tech detection systems in France and abroad, in a primary OBO completed during the summer.

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## **DLA Piper advises on the acquisition of French identity technology Provider ARIADNEXT by IDnow**

30 June 2021

DLA Piper has advised ARIADNEXT, a French company specializing in remote identity verification and digital identity creation, on its acquisition by IDnow, a German-based leader in identity verification-as-a-service solutions.

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## **DLA Piper advises The Carlyle Group on ENVEA majority equity stake acquisition negotiations**

2 July 2020

DLA Piper is advising global alternative asset manager The Carlyle Group on exclusive negotiations for the acquisition of a majority equity interest in ENVEA (listed on Euronext growth), a world-class manufacturer of ambient, emission and process monitoring systems and provider of environmental data processing and reporting solutions to industry, followed by a mandatory tender offer.

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