



# International Corporate Reorganizations

Our vast multi-disciplinary knowledge and global experience in designing and implementing efficient, cost-effective legal structures and business operating models gets results.

## The need for change

Businesses regularly review their corporate structure to ensure it provides the most effective means of achieving current and future commercial plans while ensuring appropriate **tax efficiency** and **minimizing HR risk**. Structural and business flexibility is a competitive necessity to achieve efficiency, operational synergies, cost savings and enhanced shareholder value in fluid, fast-paced global markets.

Corporate reorganization achieves these goals and presents multinational corporations with further opportunities across all parts of the business. We can help you and your business to maximize the benefits of these transformations, with detailed, tailored strategies and effective execution.

## One global team

Our International Corporate Reorganizations team comprises cross-border, multi-disciplinary teams of corporate, employment, tax, intellectual property, IT, regulatory, commercial, finance and real estate practitioners. Our team will assist you and your business with a broad range of integrated services, including post-merger integration, carve-out/spin-off, supply-chain transformation, entity rationalization and general corporate structuring.

## Transfer pricing

In addition to tax and legal services, our **transfer pricing group**, comprising dedicated lawyers, economists and accountants can provide any transfer pricing and valuation services required to implement your reorganization.

## Helping you transform

Our extensive experience and our proactive, efficient approach to managing complex global projects has given us a comprehensive understanding of the operational, financial, legal and tax implications that accompany a reorganization.

Our internationally experienced lawyers in the Project Management Office combine know-how, project management skills, tailored technology and tools to effect efficient implementation. By providing a single point of contact, our lawyers manage all material aspects of the project and ensure seamless collaboration, with minimal disruption to your in-house team and day-to-day operations.

## KEY CONTACTS

### Eda Demirel

Legal Director

London

T: +44 20 7796 6157

[email protected]

## RELATED SERVICES

- Tax
- Corporate
- Restructuring
- Projects, Energy and Infrastructure
- International Trade, Regulatory and Government Affairs
- Intellectual Property and Technology
- Finance
- Employment

## Our methodology

Having devised and implemented a significant number of international corporate reorganizations, we have developed a robust approach that ensures projects are run in the most efficient and cost effective way.

This includes:

- Central coordination and communication
- Quality review
- Central billing
- Globally aligned documentation
- Tailored technology and tools

## A truly one-stop solution

Leveraging our global footprint, deeply rooted local focus and a strategic investment in technology, we deliver a solutions-led approach based on our client's global objectives. We help streamline processes, increase accountability and identify ancillary enhancement opportunities across all sectors globally.

## CAPABILITES

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## EXPERIENCE

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- Acting for a large multinational insurance brokerage company in creating a new holding structure for its non-US subsidiaries to enable it to better manage the internal cash needs of the group and to repatriate funds to the US as efficiently as possible.
- Leading a global multi-disciplinary team in implementing a 30+ country regulatory-mandated divisionalization of a leading multinational financial services company.
- Leading the segregation of the EMEA, LATAM, Caribbean and AsiaPac subsidiaries of a global professional services firm into new regional holding companies, followed by a sophisticated leverage transaction involving 40+ countries.
- Leading the global corporate implementation effort of a global science and technology innovator's separation into two publicly-traded entities. Implementing 41 step plans that covered 54 jurisdictions and involved nearly 4,000 documents, 500 share transfers, 25 assets transfers, and the formation of more than 50 entities.
- Advising a large multinational conglomerate in a carve-out sale of a multi-jurisdictional business from a larger division across more than 20 countries.

- Advising on a post-acquisition restructuring arising out of a takeover in IT services. This was a global transaction of US\$3.1 billion designed to increase Business Process Outsourcing (BPO) capabilities and to improve and increase the infrastructure platform.

## INSIGHTS

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### Publications

#### **Global structuring and IP planning in the wake of US tax reform**

21 DEC 2018

Tax reform has imbued global structuring with a significant amount of uncertainty.

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#### **New law adopted to facilitate division of Delaware LLCs**

24 SEP 2018

Recent changes to the law governing Delaware LLCs will facilitate the division of Delaware LLCs and potentially provides a valuable new tool in corporate reorganizations involving this type of entity.

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#### **Corporate reorganizations and new public procurement challenges**

31 JUL 2018

A corporate reorganization can cause many legal challenges. The focus will often be on taxes, labor contracts, asset and legal entity transfers and organizational issues. But the regulations relating to public procurement can also create challenges.

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#### **Corporate reorganizations in Austria - Changes in Management or Shareholdings**

31 JUL 2018

Any company that intends to conduct business in Austria is required to obtain one or more business licences pursuant to the Austrian Industrial Code prior to commencing operations, unless the relevant Austrian company is a pure holding company. The issues should therefore be considered as part of the structuring process in any reorganization involving Austria to avoid any delays and/or possible risks.

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#### **International Corporate Reorganizations - US tax reform**

31 JUL 2018

On 22 December 2017, President Donald Trump signed a comprehensive US tax reform bill known informally as the "Tax Cuts and Jobs Act" (TCJA).

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#### **Corporate reorganizations in the US: five key steps**

24 JUL 2018

Corporate reorganizations can be complex and time-consuming. Here are five key tips to consider, taken from our US chapter of

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Corporate Reorganisations, part of the popular "Getting the Deal Through" Q&A comparative series.

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## Events

### Upcoming

#### Transfer Pricing Masterclass 3 - Interested in Interest: Financial Transactions in Transfer Pricing

5 JUN 2019

#### [TRANSFER PRICING MASTERCLASS SERIES 2019](#)

London

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#### Transfer Pricing Masterclass 4 & Drinks Networking - Doing your Duty: Transfer Pricing, Tax and Beyond

10 JUL 2019

#### [TRANSFER PRICING MASTERCLASS SERIES 2019](#)

London

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### Previous

#### Transfer Pricing Masterclass 2 - Between the Uprights: Valuations in Tax and Transfer Pricing

8 MAY 2019

Transfer Pricing Masterclass Series 2019

London

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#### Transfer Pricing Masterclass 1 - Knowing the Issues: Identifying Transfer Pricing Risk and Opportunity

10 APR 2019

Transfer Pricing Masterclass Series 2019

London

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## NEWS

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### DLA Piper announces launch of Artificial Intelligence practice

14 MAY 2019

DLA Piper announced today the launch of its Artificial Intelligence practice, which will focus on assisting companies as they navigate the legal landscape of emerging and disruptive technologies, while helping them understand the legal and compliance risks arising from the creation and deployment of AI systems.

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## **DLA Piper lawyers and practices ranked in latest Chambers edition**

30 APR 2019

DLA Piper today announced that 158 of the firm's lawyers and 64 of its practices were ranked in *Chambers USA's* 2019 guide.

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## **DLA Piper announces partnership promotions for 2019**

1 APR 2019

DLA Piper is proud to announce that 77 lawyers have been promoted to its partnership. The promotions are effective as of April 1, 2019 in the United States and May 1, 2019 for EMEA and Asia Pacific. The promotions were made across many of the firm's practice areas in 43 different offices throughout 20 countries.

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## **Non-resident real estate investors bullish on Capital Gains Tax changes**

19 MAR 2019

Non-resident real estate investors are holding their nerve on UK investment strategies despite impending capital gains tax (CGT) changes coming into force next month and uncertainty around Brexit. According to a DLA Piper report, more than half (58 percent) of those polled expect the new tax code will have no impact on their investment strategy.

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## **DLA Piper UK report shows non-resident real estate investors are bullish on British capital gains tax changes**

19 MAR 2019

Non-resident real estate investors in the United Kingdom remain bullish despite impending capital gains tax (CGT) changes coming into force next month and uncertainty around Brexit.

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## **Kevin Glenn joins DLA Piper's Tax practice in New York**

6 MAR 2019

DLA Piper announced today that Kevin Glenn has joined the firm's Tax practice as a partner in New York.

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## **DLA Piper announces launch of Blockchain and Digital Assets practice**

26 FEB 2019

DLA Piper announced today the launch of its Blockchain and Digital Assets practice, which will offer strategic advice on a global basis to address the needs of companies implementing blockchain technology solutions and creating and deploying digital assets.

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## **DLA Piper enhances cross-border tax capability with new partner hire in Dublin**

26 FEB 2019

DLA Piper today announces the appointment of Maura Dineen as a Tax partner in the firm's newly opened Dublin office. This is the fifth partner hire for DLA Piper in Dublin in a month, following the announcements in January of Conor Houlihan (Finance & Projects), Éanna Mellett (Corporate), Mark Rasdale (Intellectual Property & Technology) and Ciara McLoughlin (Employment).

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## **Joseph Myszka joins DLA Piper's Tax practice in Silicon Valley**

28 JAN 2019

DLA Piper announced today that Joseph Myszka has joined the firm's Tax practice as a partner in Silicon Valley.

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## **Daniel Robyn joins DLA Piper's Tax practice in Los Angeles**

22 JAN 2019

DLA Piper announced today that Daniel Robyn has joined the firm's Tax practice as a partner based in both Los Angeles and Northern California offices.

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## **Barbara Mace joins DLA Piper as principal economist in New York**

16 JAN 2019

DLA Piper is pleased to announce that Barbara Mace has joined the firm as a principal economist based out of the New York office.

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## **DLA Piper advises Columbia Capital, LLC in its US\$21 million equity investment in Resilience360**

13 NOV 2018

DLA Piper represented Columbia Capital, LLC in its US\$21 million equity investment in Resilience360 GMBH.

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## **DLA Piper and cooperative firm lawyers recognized by the Latin American Corporate Counsel Association**

17 JUL 2018

DLA Piper is pleased to announce that the Latin American Corporate Counsel Association have included eleven firm and cooperative firm attorneys on their list of Latin America's leading business lawyers.

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## **Andrés González Becerra joins DLA Piper's Tax practice in Colombia**

25 JUN 2018

DLA Piper announced today that Andrés González Becerra has joined DLA Piper Martinez Beltran in Colombia as a partner and leader of the Tax practice.

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### **DLA Piper Africa welcomes Zimbabwe member firm**

19 JUN 2018

DLA Piper Africa has announced that leading Zimbabwean law firm, Manokore Attorneys, is joining as the member firm in Zimbabwe.

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### **DLA Piper takes home eight awards at 2018 International Tax Review European Tax Awards**

18 MAY 2018

DLA Piper has won eight awards at the International Tax Review European Tax Awards 2018, in a ceremony that took place on Thursday, May 17, 2018 at the Savoy Hotel in London.

The firm has been named UK Transfer Pricing Firm of the Year, Spain Tax Firm of the Year and Gulf Cooperation Council Tax Firm of the Year.

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### **DLA Piper announces partnership promotions for 2018**

3 APR 2018

DLA Piper is proud to announce that 62 lawyers have been promoted to its partnership. The promotions are effective as of 1 April 2018 in the United States and 1 May 2018 for EMEA and Asia Pacific. The promotions were made across many of the firm's practice areas in 42 different offices throughout 20 countries.

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### **DLA Piper advises Cabinet Group on Funcom joint venture**

9 FEB 2018

DLA Piper represented Cabinet Group LLC on tax and Norwegian law matters in its joint venture with Funcom N.V., a Norwegian developer, to establish Heroic Signatures.

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### **DLA Piper advises Harrison Street on Crosslane joint venture**

5 FEB 2018

Global law firm DLA Piper has advised leading real estate investment firm Harrison Real Estate Capital LLC, on its joint venture with Crosslane Property Group UK, a real estate company specialising in purpose built student accommodation (PBSA) across the UK and Continental Europe.

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### **DLA Piper partner Diana Erbsen named to IRS Advisory Council**

16 JAN 2018

DLA Piper is pleased to announce that the Internal Revenue Service has appointed Diana Erbsen to the Internal Revenue Service Advisory Council (IRSAC).

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## **DLA Piper appoints Jessica Tien as principal economist based in Silicon Valley**

11 JAN 2018

DLA Piper is pleased to announce it has appointed Jessica Tien as a principal economist in Silicon Valley. She focuses on the planning and implementation of transfer pricing structures designed to achieve long-term business objectives while meeting transfer pricing compliance requirements. Tien has successfully concluded a number of supply chain planning projects advising on domestic and cross-border intercompany transactions flows and associated transfer pricing arrangements.

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## **Lewis Greenwald joins DLA Piper's Tax practice in New York**

26 DEC 17

DLA Piper announced today that Lewis Greenwald has joined the firm's Tax practice as a partner in the New York office.

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## **DLA Piper launches Middle East Tax practice**

4 DEC 2017

DLA Piper has strengthened its International Tax practice with the appointment of Ton van Doremalen as partner and Head of Tax in the Middle East. Ton joined the firm's Dubai office on 3 December 2017.

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## **DLA Piper launches Finance Rules of the World**

2 Nov 2017

DLA Piper's global Finance & Projects practice has today launched Finance Rules of the World, a knowledge site for clients, which summarizes key legal questions and answers to be considered when initially looking at financing or investing in particular jurisdictions.

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## **DLA Piper launches new platform for *Guide to Going Global* series**

20 SEP 2017

DLA Piper has launched a new platform featuring its *Guide to Going Global* series, an online resource designed to help companies operating and growing their international businesses.

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## **DLA Piper advises Beijing BDStar Navigation Co., Ltd on the purchase of an interest in the in-tech Group**

19 Jun 2017

DLA Piper has advised BDStar as part of a bidding procedure on the acquisition of an interest in the company in-tech GmbH, a supplier for the digitization and the development in the area of automotive, machinery and transportation systems.

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