



## Tax

Global experience in designing and implementing reorganizations that achieve your business objectives and effective tax planning

### The changing tax environment

The rapidly changing international tax environment means that it is more important than ever for multinational businesses to consider not only the impact of their corporate structure on their effective tax rates, but also to take into account reputational issues and the potential consequences of increasingly complex legislation. Given these factors, it is critical to take a global view.

Whether you are looking to expand your global footprint, restructure your supply chains, refinance your group, consolidate or simplify your business post-merger or acquisition, improve your group's tax efficiency or simply review the tax position of your existing structure, our team of more than 300 tax advisors across the world can see the global picture and help you to navigate this changing tax landscape.

### How international tax considerations affect your business

Tax authorities around the world have become more assertive in collecting taxes. Many governments view the old system of tax treaties and transfer pricing rules as insufficiently robust to protect national tax bases in the modern world of highly mobile people and capital and increasingly technology-based global trade. These issues have led to a raft of supranational and national initiatives and legislative proposals, many of which will be of critical importance to any multinational business.

The measures proposed in the OECD's and G20's Base Erosion and Profit Shifting (BEPS) Project have been endorsed by more than 100 countries and are being implemented worldwide. In the EU, the Anti-Tax Avoidance Directives (ATAD and ATAD II) include various BEPS initiatives. These changes are all taking place against a backdrop of rapidly increasing information exchange between national tax authorities.

These developments could have profound effects on the structure of your group, for example by denying deductions or treaty withholding rates for cross-border money flows, or targeting misalignments between location of profits and the activity or assets generating those profits. Greater levels of information exchange could also expose unprepared multinationals to a range of questions from tax authorities, litigation risks and, potentially, higher tax liabilities.

## NEWS

**DLA Piper advises P3 Logistic Parks on the rental of commercial space to Makita**

### KEY CONTACTS

#### Michael W. Hardgrove

Partner

Boston

T: +1 617 406 6039

[michael.hardgrove@dlapiper.com](mailto:michael.hardgrove@dlapiper.com)

#### Alison Maxwell

Partner

Seattle

T: +1 206 839 4878

[alison.maxwell@dlapiper.com](mailto:alison.maxwell@dlapiper.com)

#### Sibel Owji

Partner

San Francisco

T: +1 415 836 2563

[sibel.owji@dlapiper.com](mailto:sibel.owji@dlapiper.com)

#### Philip Rogers

Partner

New York

T: +1 212 335 4903

[philip.rogers@dlapiper.com](mailto:philip.rogers@dlapiper.com)

#### Ben Brown

Partner

London

T: +44 (0)20 7796

6204

[ben.brown@dlapiper.com](mailto:ben.brown@dlapiper.com)

### RELATED SERVICES

- International Corporate Reorganizations

## **Werkzeug GmbH**

27 August 2020

DLA Piper has advised P3 Logistic Parks GmbH on the rental of commercial space to Makita Werkzeug GmbH.

---

## **DLA Piper advises Syngenta on the acquisition of South African Sensako Group**

17 August 2020

DLA Piper has advised Swiss-based Syngenta Group on its acquisition of Sensako Group, a South African seeds company engaged in the breeding and the commercialization of agronomic crops.

---

## **DLA Piper announces partnership promotions for 2020**

30 April 2020

DLA Piper is proud to announce that 67 lawyers have been promoted to its partnership. The promotions are effective as of April 1, 2020 in the United States and May 1, 2020 for EMEA and Asia Pacific. The promotions have been made across many of the firm's practice areas in 35 different offices throughout 13 countries.

Across the firm's practices globally, Corporate saw the largest intake of new partners with 19 promotions, followed by Litigation and Regulatory with 15. Intellectual Property and Technology and Finance and Projects had ten and eight promotions respectively, while there were six in Real Estate. Tax and Employment both had four, and there was one in Restructuring.

---

## **DLA Piper advises Eiffage and JOHANN BUNTE consortium on Germany's largest ever motorway PPP**

14 April 2020

DLA Piper has successfully advised the consortium A3 Nordbayern with its shareholders Eiffage S.A. and JOHANN BUNTE Bauunternehmung GmbH & Co. KG on the financing of Germany's largest PPP project in the motorway sector.

---

## **DLA Piper lawyers named Acritas Stars**

10 March 2020

Acritas has named over 200 DLA Piper lawyers as 2020 Acritas Stars. Now in its fourth year, Acritas Stars highlights the stand-out lawyers in private practice as nominated by clients around the world. More than 3,000 senior in-house counsel feed into the nomination process to give a comprehensive view of highly recommended lawyers across the globe.

---

## **DLA Piper advises Hahn Group on sale of Campus Center Lübeck**

18 December 2019

DLA Piper has advised Hahn Group on the sale of Campus Center Lübeck to real estate investment manager Nuveen Real Estate, which acquired the property for its German core retail platform.

---

## **DLA Piper launches Global Digital Services VAT Guide**

29 November 2019

DLA Piper has launched the fourth edition of its Global VAT Guide on Digital Services, covering cross-border supplies of digital content,

---

intangible services and, more generally, the various forms of e-commerce.

---

### **DLA Piper advises The Carlyle Group on its investment in HSO Group**

6 September 2019

DLA Piper has advised The Carlyle Group on its investment in HSO Group. Equity for the investment is provided by Carlyle European Technology Partners III Fund (CETP), a EUR635 million fund that invests in technology-focused companies in Europe and the US.

---

### **DLA Piper adviseert The Carlyle Group bij investering in HSO Group**

6 September 2019

DLA Piper heeft The Carlyle Group geadviseerd bij de investering in HSO Group. Het eigen vermogen voor de investering kwam van Carlyle European Technology Partners III Fund (CETP), een fonds van EUR635 miljoen dat investeert in technologiegerichte bedrijven in Europa en de VS.

---

### **DLA Piper advises Rolls-Royce on acquisition of Siemens' eAircraft business**

21 June 2019

DLA Piper has advised Rolls-Royce plc on the acquisition of Siemens' electric and hybrid-electric aerospace propulsion activities, eAircraft. The acquisition will accelerate the delivery of Rolls-Royce's electrification strategy and boost its ambition to play a major role in the "third era" of aviation. The completion of the transaction is expected in late 2019, following a period of employee consultation.

---

### **DLA Piper named UK transfer pricing firm of the year for the third year running**

17 MAY 2019

DLA Piper has been named UK Transfer Pricing Firm of the Year for the third year running at the International Tax Review (ITR) European Tax Awards 2019, in a ceremony held in London on 16 May. The firm was also, and for the first time this year, named Africa Transfer Pricing Firm of the Year.

---

### **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.

---

### **DLA Piper advises BrewDog on acquisition of iconic Berlin brewery**

6 MAY 2019

DLA Piper has advised BrewDog, a multinational craft brewery and pub chain based in Scotland, on the acquisition of World Bistro & Gardens in Berlin from Stone Brewing, one of the largest craft breweries in the US.

---

### **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.

---

### **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.

---

### **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.

---

### **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).

---