



Emre Akan

Senior Associate

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Emre Akan is an international tax lawyer advising asset managers on the tax aspects of cross-border private equity, real estate and debt investments and the tax structuring of regulated and unregulated investment funds.

Emre also advises large corporate groups on the tax aspects of corporate restructurings, securitization and capital markets transactions.

- Tax

English French Turkish

LANGUAGES SPOKEN

- English
- French
- Turkish

- Advising a leading insurance group on the structuring, setting up and launching of a real estate alternative investment fund structure focusing on the French retail market.
- Advising a world leading consumer goods company on a mutual agreement procedure between Luxembourg and Russia in relation to a substantial tax dispute with the Russian Tax Authorities.
- Advising a leading multinational financial services corporation on the reorganization of its worldwide holding company structure in order to reposition it following the major US tax reform.
- Representing a US based company in a litigation before the Luxembourg administrative tribunal in relation to the use of the preferential tax regime on intellectual property assets.

Prior Experience

- 2021 - to date: Senior Associate, DLA Piper Luxembourg

- 2019 to 2021: Associate, DLA Piper Luxembourg
- 2017 to 2018: International Law Firm, Luxembourg

Education

- King's College London, International Tax Law, LLM, 2015
- Paris II Panthéon Assas / H.E.C. Paris, Master 2 in International Tax Law, 2014

Memberships

- Member of the British Chamber of Commerce
- Member of the Luxembourg Banker's Association (ABBL)
- Member of the Luxembourg Private Equity and Venture Capital Association (LPEA)
- Avocat registered with the list IV of the Barreau de Luxembourg
- Avocat admitted to the Paris Bar

INSIGHTS

Publications

ATAD 2 in Luxembourg: Watch out for the imported hybrid mismatch rule

20 October 2021

The ATAD 2 directive (as defined below) has been transposed into Luxembourg law with a series of safeguards and carve-outs limiting the impact of these rules beyond the necessary. This has been reflected by the implementation of a *de minimis* rule applicable to investors in a Luxembourg investment fund.

Double Tax Treaty Protocol for Russia and Luxembourg

8 April 2021

On 6 November 2020 Russia and Luxembourg signed a new protocol amending the double tax treaty concluded between the two countries (Protocol), which has been in effect since 1 January 1998.

Emre Akan has written publications on:

- Double Tax Treaty Protocol for Russia and Luxembourg, 8 April 2021
- "La nouvelle circulaire 164ter/1 relative au régime des sociétés étrangères contrôlées : entre clarifications équivoques et difficultés pratiques persistantes", *Revue de Droit Fiscal*, 2020
- "Corporate reorganizations in the US, Belgium and Luxembourg: What should you be considering? Getting the Deal Through (Lexology)", 2020
- International Fiscal Association Luxembourg Report, *Cahiers de Droit Fiscal International*, Volume 104B : Investment Funds, 2019
- "Le régime fiscal des plans d'option sur acquisition d'actions - Evolutions récentes et perspectives ", *Bulletin Droit et Banque ALJB*, n°62, 2018
- "Privilege 2016 - France Chapter", *Know How Series*, *Global Investigation Review*, 2016

NEWS

DLA Piper announces promotions in Luxembourg

3 May 2021

DLA Piper is pleased to announce a new round of promotions in Luxembourg.

DLA Piper advises Medtronic on public offering of EUR6.25 billion of senior notes and redemption of outstanding senior notes

12 October 2020

DLA Piper has advised Medtronic Global Holdings S.C.A. (Medtronic LuxCo) on its registered public offering (the "Offering").
