



Ben Brown

Partner
HEAD OF TAX, UK

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Ben Brown has extensive experience of advising on the UK and international tax aspects of M&A, corporate transactions and finance work as well as VAT matters. He focusses on the taxation aspects of corporate and financing transactions, both with a UK and international flavour.

- Tax
- Financial Services
- Energy and Natural Resources

- Murphy Oil Corporation on the disposal of its UK retail petrol station network to Patron Capital and the sale of its Milford Haven Refinery to Klesch Refining Limited
- Royal Dutch Shell on the US\$1bn disposal of its African retail network (including retail stations, commercial fuels, LPG, lubricants and marine businesses in 18 African countries)
- Morgan Stanley on the purchase and warehousing of a £13 billion portfolio of Northern Rock loans from the UK government and on a subsequent £6.1 billion securitisation
- Arqiva on its £3.6 billion corporate re-organisation, re-financing and whole business securitisation
- Virgin Money on the acquisition of £1 billion of credit card receivables from MBNA
- Macquarie on the acquisition of various offshore wind farm transmission assets
- Various financial institutions on the VAT treatment of outsourcing, securitisation servicing arrangements and other finance VAT matters

Professional Qualifications

- Solicitor of the Senior Courts of England and Wales, 2002

Education

- College of Law, Guildford CPE (Commendation) and LPC (Distinction), 2000
- University of Exeter BA (Hons) French and Spanish, 1998

Memberships

- VAT Practitioners' Group
- VAT and Duties Sub-Committee of the Law Society

INSIGHTS

Publications

UK tax amortisation of IP

27 July 2020

The UK does not, at present, permit tax amortisation of 'old' (i.e. pre-April 2002) IP assets. The UK Government proposes to remove this restriction in relation to IP transferred within a group to a UK company after 1 July 2020. This change may be of material benefit to some groups considering an IP transfer to the UK.

- International tax issues to watch, 10 May 2018
- International tax landscape, 10 May 2018
- The UK tax treatment of Initial Coin Offerings, 6 Mar 2018

NEWS

DLA Piper advises Seaspan Corporation in US\$201.25 million 3.75% exchangeable senior notes offering

4 January 2021

DLA Piper represented Seaspan Corporation, a leading independent owner and operator of containerships, in its offering of US\$201.25 million principal amount of 3.75% exchangeable senior notes due 2025 closed on December 21, 2020.

DLA Piper advises Concord in closing of US\$1 billion in debt financing

18 August 2020

DLA Piper represented Concord in a US\$600 million term loan B debt offering and US\$450 million revolving credit facility, providing the company with access to over US\$1 billion of total debt financing in one of the largest music industry financings in recent times.
