



## Tax

DLA Piper provides the full range of tax services that address the challenges of international commerce and business operations.

With more than 440+ tax advisors in offices throughout the world, we help multinational companies address the complex challenges of international commerce and business operations as well as manage and resolve tax disputes.

Companies operating in the global economy experience complex tax issues, both in their home country and in the jurisdictions in which they do business; this requires a coordinated global delivery of services incorporating both knowledge of national legislation, including tax treaties, as well as the appropriate international perspective.

Our global tax group also assists clients in structuring a wide range of transactions, from private equity deals to corporate acquisitions and disposals.

We provide these international tax services while at the same time offering clients the benefits of the attorney-client and work-product privileges.

Our tax lawyers draw upon the experience of colleagues in numerous areas of law, including intellectual property and technology, corporate and finance, real estate, employment and employee benefits.

In addition, DLA Piper's practices in such areas as regulatory and EU competition, public affairs and government affairs further strengthen the capabilities of our tax practitioners, resulting in fully integrated advice to our clients.

## EXPERIENCE

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- Advising a global health sciences company in the negotiation of a bilateral Advanced Pricing Agreement (APA), representing the first bilateral APA negotiated between the United States and Ireland
- Advising a private equity firm in connection with a global acquisition resulting in the creation of the largest independent global pigment dispersion platform
- Advising the world's #1 nonfiction media company in connection with its high-profile, multi-jurisdictional acquisition of TV and radio business activities in Northern Europe
- Advised a networking equipment manufacturer in connection with an international restructuring project requiring in-depth VAT and customs advice. Implementation of the new distribution models required integrated indirect tax advice covering both local customs and VAT/GST regulations primarily in the EMEA and Hong Kong
- Advising a leading cotton processing and marketing organization with comprehensive tax structuring and planning advice in connection with its joint venture arrangements with one of the world's largest commodity traders

### KEY CONTACTS

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- Advising a leading developer of IT solutions for small to mid-sized businesses in connection with the design and implementation of an international structuring project involving Luxembourg, the British Virgin Islands, Malta, Netherlands, Germany and the UK
- Advising a provider of instruments, components, subsystems and process control solutions in the design and implementation of an international structuring project, involving the UK, Luxembourg, Germany, Hong Kong and the British Virgin Islands, to address international business expansion issues resulting from prior acquisitions and internal reorganization
- Advising a publicly listed manufacturer of networking equipment on the planning and implementation of a global restructuring to convert its distribution network from a Hong Kong principal to a Netherlands principal
- Advising a leading specialty retailer of children's clothing in the planning and implementation of an international restructuring project
- Advising one of the fastest growing cyber security companies in the design and implementation of an international structuring project involving 15 countries

## AKTUELLES

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### Publikationen

#### **Global Tax Alert: Repeal of IR35 Reforms – What Does This Mean?**

26 September 2022

In delivering his mini-budget on 23 September 2022, the Chancellor announced a wide-ranging series of tax cuts and reforms, with a focus on incentivisation, investment and making Great Britain more competitive on the global stage.

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#### **UK mini budget 2022 - Real Estate**

23 September 2022

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#### **UK mini-budget 2022**

23 September 2022

A review of key updates from the Autumn Budget announcement

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#### **UK mini-budget 2022 - Corporate**

23 September 2022

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#### **UK mini-budget 2022 - Employment and Pensions**

23 September 2022

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#### **UK mini-budget 2022 - International**

23 September 2022

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#### **UK mini-budget 2022 - Investment Funds**

23 September 2022

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## UK mini-budget 2022 - VAT

23 September 2022

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## Blockchain and Digital Assets News and Trends

21 September 2022

### [BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

IRS releases draft Form 1040 with new cryptocurrency question; lawsuit may expand liability exposure of blockchain software developers.

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## 183 days of war in Ukraine: Tax considerations for refugees and their employers

20 September 2022

A reminder to employers with a dispersed workforce of Ukrainian refugees to take a look at the status of these employees.

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## 2023 Dutch Budget Plan – Tax Proposals

20 September 2022

On 20 September 2022, the Dutch government published its tax proposals for 2023 and onwards.

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## Tax and digital transformation in Latin America

30 August 2022

### [PANORAMA](#)

As Latin American companies navigate new technologies, they must consider relevant jurisdiction-specific laws.

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## Inflation Reduction Act seeks to jumpstart electric vehicle market

19 August 2022

Electric vehicle-related tax incentives in the Inflation Reduction Act and the multiple conditions that may initially limit their applicability and use.

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## Inside the Inflation Reduction Act

19 August 2022

A look at the business-critical aspects of this sweeping, extraordinary legislation and its implications for clean energy projects, electric vehicle development, corporate taxes, healthcare, and environmental policy.

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## Brazil: Transfer of a going concern – what you need to know

## CROSSROADS – ICR INSIGHTS

A transfer of a going concern (TOGC), commonly used in Brazilian asset deals and internal reorganizations such as carveouts, requires thoughtful planning. Learn what important aspects to consider with TOGCs.

By: [Alex Jorge](#) | [Rafaella Chiachio](#)

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### Canada: Choosing to incorporate your subsidiary in British Columbia

## CROSSROADS – ICR INSIGHTS

Looking to incorporate in Canada? British Columbia is consistently at the forefront of user-friendly, modern Canadian corporate law.

By: [Benjamin Bluman](#)

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### Cayman Islands: Benefitting from its flexibility and tax-neutral status

## CROSSROADS – ICR INSIGHTS

Migrating to the Cayman Islands offers benefits such as flexibility and tax neutral status. What to keep in mind?

By: [Sam Francis](#)

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### Hong Kong: Should you deregister or liquidate that subsidiary?

## CROSSROADS – ICR INSIGHTS

Learn the nuances between deregistering an entity and liquidating an entity when it's time to eliminate that subsidiary in Hong Kong.

By: [Heng Loong Cheong](#) | [Tommy Lam](#)

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### Japan: Navigating foreign direct investment rules when you are contemplating a corporate reorganization

## CROSSROADS – ICR INSIGHTS

When in Japan, if you are acquiring equity, changing a shareholder as part of a reorganization or taking certain other corporate actions, you need to beware of the new foreign investment rules.

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### Netherlands: How to successfully navigate distributions out of a Dutch BV

## CROSSROADS – ICR INSIGHTS

Pitfalls that may be encountered when calculating distributable reserves.

By: Manon den Boer and Aad Oomen

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## Switzerland: Employee transfers in an asset deal

### CROSSROADS – ICR INSIGHTS

Learn the Swiss law exception to automatic transfers of existing employment relationships in an asset deal.

By: [Dominik Hohler](#)

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## Switzerland: Grappling with the financial assistance rules

### CROSSROADS – ICR INSIGHTS

Upstream or cross-stream financial assistance within a group of companies is a controversial topic in Switzerland. Dominik Hohler, Partner at Walder Wyss Ltd., provides a view of the current legal landscape.

By: [Dominik Hohler](#)

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## US: Tips on converting a corporate entity

### CROSSROADS – ICR INSIGHTS

What to do when one US state won't allow you to readily convert from one entity type to another.

By: [Benjamin Guez](#)

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## The clean energy provisions of the Inflation Reduction Act of 2022 – a historic effort to encourage the development of clean energy and reduce carbon emissions

17 August 2022

The IRA will have a dramatic impact on development and financing of clean energy projects in the US over the next ten years, not least by expanding tax credits to additional technologies and allowing project owners to directly transfer those credits.

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## Inflation Reduction Act: 15 percent minimum book tax in the context of Pillar 2

1 August 2022

US Treasury and the OECD appear committed to finding a solution that could incorporate some kind of tracing mechanism for Pillar 2 purposes into GILTI.

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## Tax incentives in Puerto Rico

6 July 2022

[PANORAMA](#)

In this handbook, we highlight some of the tax incentives available under the PR-IC for certain targeted activities that may apply for and obtain a tax decree to enjoy these incentives.

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## UK consultation on sovereign immunity from direct taxation

6 July 2022

On 4 July, the UK government launched a consultation on the UK's regime for sovereign immunity from UK direct taxation. The UK government's proposals are to dramatically curtail the existing immunity from UK tax as it applies to sovereign investors (other than with respect to income tax on passive interest income).

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## Exploring the metaverse: What laws will apply?

22 June 2022

[INTELLECTUAL PROPERTY AND TECHNOLOGY NEWS](#)

For those intrigued by the metaverse, and for creators building metaverse projects, here are practical considerations.

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## Responsible Financial Innovation Act, the new proposed crypto regulation bill, provides some clarity on tax issues

16 June 2022

The proposed tax provisions would, if enacted, address at least a few of the industry's largest complaints.

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## Changes to the UK/Luxembourg double tax treaty

15 June 2022

On 7 June 2022, the UK and Luxembourg governments signed a protocol to amend the double tax treaty (the treaty) between both jurisdictions.

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## Biden Administration's Greenbook signals continued focus on taxation of cryptocurrency and digital assets

23 May 2022

The Greenbook outlines a number of tax proposals addressing trading and lending of cryptocurrency and digital assets.

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## OECD releases public consultation document on crypto tax reporting in effort to increase transparency

23 May 2022

The proposed framework would provide for automatic exchange of tax-relevant information between tax administrations for cryptoasset transactions.

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## **Brazil sets forth conditions for tax settlements in goodwill disputes: multinationals take note**

18 May 2022

A quick discussion of Public Notice n° 9/2022.

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## **EU Commission proposes tax incentive for equity, disincentive for debt**

16 May 2022

As follow-up on the Communication on Business Taxation for the 21st Century issued in May 2021 setting-out the European Commission's (EC) long-term vision to provide a fair and sustainable business environment and European Union (EU) tax system, the Commission released on 11 May 2022 a draft directive proposing the introduction of a debt-equity bias reduction allowance (DEBRA).

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## **ATAD III - assessing anti-tax avoidance measures**

4 May 2022

Financial Worldwide Magazine discusses the assessment of anti-tax avoidance measures with Jean Paul Dresen, Luis Muñoz and Sorina van Kommer at DLA Piper.

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## **Spain recognizes French FPCI accreditation of tax residence through the special regime for EU funds**

21 April 2022

In October 2019, Spain introduced a special regime to facilitate pension and collective investment funds of the European Union (EU) the evidence of their tax residence status for the purposes of the application of the domestic withholding tax exemption on interest payments and capital gains realized by residents of the EU or EEA.

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## **Spain introduces a levy on non-reusable plastic packaging**

19 April 2022

On 9 April 2022 the Official Gazette has published Law 7/2022 of 8 April concerning waste and contaminated land for a circular economy

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## **OECD releases draft Model Rules on Scope of Amount A under Pillar 1**

5 April 2022

Comments on the draft rules are due on April 18, 2022.

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## **Implications of recent Treasury Green Book tax proposals**

29 March 2022

Taken together, the Treasury Department concludes that the proposals would raise more than \$2.5 trillion over the ten-year budget cycle.

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## **OECD releases commentary on the Pillar Two GloBE Rules – observations on selected topics**

17 March 2022

A look at six topics found in the commentary which have particular relevance for multinational companies and other stakeholders.

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### **UK consultation on potential new online sales tax**

14 March 2022

The UK government has released its consultation on a potential new online sales tax (OST), which it is considering as an option to help rebalance taxation of the retail sector. This article examines why this is being considered, how it would work and what happens next.

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### **Transposition of the ATAD2 Directive: A France-Luxembourg perspective**

10 March 2022

The application of the ATAD 2 rules in Luxembourg remains one of the most complex tax topic nowadays. Many questions remain open due to the absence of guidelines issued by the Luxembourg tax authorities. The lack of uniformity in the implementation of ATAD 2 among the Member States expands the uncertainty around the topic.

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### **UK Tax Alert**

3 March 2022

Most organisations will be aware that with effect from the 6 April 2021 transformative changes were made to the off-payroll working rules, commonly referred to as the IR35 regime, which apply to the private sector.

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### **Global Tax Alert - Sweden: Incentives in merger and acquisitions**

23 February 2022

The purpose of this article is to provide a general overview of the principles of taxation of Swedish incentive programmes and to connect these rules to various situations that often occur in M&A transactions.

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### **Exploring the metaverse: What laws will apply?**

22 February 2022

Like any new foundational technology, the metaverse remains confusing and unknown to many. Writing for *Chambers TMT 2022*, we explore key questions.

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### **OECD publishes draft Tax Base Determination rules for Pillar 1 Amount A**

22 February 2022

As part of a rolling release of draft Model Rules for Amount A of Pillar 1, on 18 February 2022, the OECD released for public comment draft Model Rules for defining the Tax Base that is the subject of the income reallocation envisioned by Amount A of Pillar 1.

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### **Blockchain and Digital Assets News and Trends**

18 February 2022

[BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)



Lawsuit tackles tax treatment of staking rewards; SEC settles with crypto lending platform; emergency measures in Canada affect financial services entities.

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### **Global Tax Alert: New guidance from HMRC on Crypto 'Decentralised Finance: Lending and Staking'**

7 February 2022

HMRC has expanded its internal manual on Cryptoassets published in March last year to include guidance on 'decentralised finance' (or DeFi) together with various worked examples.

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### **OECD makes progress on Pillar 1 – release of draft Sourcing and Nexus Rules of Amount A**

7 February 2022

Comments are due February 18, 2022.

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### **UAE introduces federal corporate income tax from June 2023**

31 January 2022

Details of the contours of the UAE's regime.

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### **Global Tax Alert: Spanish tax authorities deny withholding tax exemption on the grounds of the general anti-abuse clause**

19 January 2022

The Spanish tax authorities challenged and denied the applicability of a domestic exemption of interest payments made by a Spanish tax resident entity to a Dutch tax resident entity on the grounds of a general anti-abuse rule arguing that the Dutch entity did not have sufficient substance.

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### **Reform of the Belgian expat tax regime**

7 January 2021

The Belgian Parliament has recently approved a bill which reforms the existing tax regime and incorporates this special tax regime in the Belgian Income Tax Code, whereas the current system was governed by a Circular Letter issued by the Belgian tax administration.

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### **Global Tax Alert: Reform of the Spanish tax treatment of the carried interest**

6 January 2022

The bill to promote startups (*Proyecto de Ley de fomento del ecosistema de las empresas emergentes*) introduces significant changes in the tax treatment of the carried interest paid to the managers of private equity funds.

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### **EU Directive ATAD 3 proposes new minimum substance rules against the use of shell companies**

4 January 2022

The Directive introduces reporting requirements for EU tax-resident companies – irrespective of their legal form – with certain mobile

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and passive income streams and inadequate operational substance.

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## **Following suit, European Commission publishes draft EU Directive to swiftly implement OECD 15 percent global minimum tax**

23 December 2021

The proposal delivers on the EU's pledge to ensure swift and harmonized implementation of the historic international agreement on global tax reform.

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## **OECD issues detailed rules to implement global minimum tax: a look at the 10 chapters**

21 December 2021

The guidelines provide a detailed description of the rules that the jurisdictions under the Inclusive Framework are to implement in their local legislation.

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## **2021 Guide to VAT on Digital Services**

December 2021

This guide provides a country-by-country overview of VAT law covering cross-border supplies of digital content, intangible services and, more generally, the various forms of e-commerce.

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## **The European Commission opens infringement proceedings against Spain challenging the income tax rules re. capital gains realized by non-residents**

15 December 2021

In December 2021 the European Commission has started infringement proceedings by sending a letter of formal notice to Spain requesting to align its rules on the taxation of capital gains obtained by non-resident taxpayers with the free movement of capital (Article 63 TFEU).

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## **Opportunities in England's eight new freeports**

15 November 2021

The UK Spring Budget in 2021 illustrated the reality of the UK's economic situation as a result of the restrictions implemented during the COVID-19 pandemic. The Chancellor used the opportunity to outline the Government's plan to build the 'future economy' through an investment-led recovery plan, which included eight new freeports in England.

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## **Global Tax Alert: Spanish Government publishes 2022 draft Budget Act**

27 October 2021

On 15 October 2021, the Spanish government approved the draft of the 2022 Budget Act ("the 2022 Budget"). The 2022 Budget includes several tax measures aimed at increasing tax revenue.

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## **Blockchain and Digital Assets News and Trends**

18 October 2021

## BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS

Non-fungible tokens: What are the legal risks?

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### OECD announces global deal on international tax reform with its Two-Pillar solution

11 October 2021

In addition, the OECD sets out a detailed implementation timeline aiming to have parts of the plan ratified in 2022 and effective as early as 2023.

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### Additional comment and conclusion

7 October 2021

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### Eligibility criteria

7 October 2021

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### Regulatory analysis

7 October 2021

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### The tax proposals: a closer look

7 October 2021

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### UK Funds: New Tax Regime for UK Asset Holding Companies

7 October 2021

In private equity, the Fund vehicle is typically a limited partnership, which is tax transparent for most investors (indeed an investor treating the Fund vehicle as opaque creates all sorts of challenges for many Funds pursuant to anti-hybrid rules).

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### Australia announces expanded double tax treaty network

30 September 2021

In this update we describe how the expansion of the double tax treaty network in Australia is very timely and well supported.

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### House tax proposal: significant statutory changes include raising corporate rate, overhauling international taxation system

21 September 2021

While the Senate is likely to cut back on some of the proposals, tax increases for business and individuals are expected to be enacted

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by Thanksgiving.

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## Blockchain and Digital Assets News and Trends

17 September 2021

### [BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

Proposed infrastructure bill would subject cryptocurrencies to wash sale and constructive sale rules.

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## Global Tax Alert: The 2019 interest deduction limitation rules in the light of the Lexel v. Skatteverket-verdict

20 September 2021

On March 22 this year, the verdict came in the well-known Lexel case (case no 4849-18 and 4849-18) where the 2013 interest deduction limitation rules were discussed. The case concerns whether the Swedish rules regarding interest deductions could be considered to restrict the freedom of establishment in a prohibited way.

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## Recent changes to CJEU rulings in relation to VAT refunds

20 September 2021

On September 9, 2021 (C-294-20) the Court of Justice of the European Union (CJEU) ruled that the Tax Authorities may reject the VAT refund of a taxable person not established in the territory of the country if the taxable person does not submit the documents justifying the request during the administrative proceeding.

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## Proposed infrastructure bill would subject cryptocurrencies to wash sale and constructive sale rules

17 September 2021

The move comes as part of the Ways and Means Committee's attempt to raise revenue to finance infrastructure spending.

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## Investing in Residential in Europe

24 August 2021

Residential is the new logistics! After the unprecedented growth of online shopping and the related boom in investment in logistics assets, Europe is now turning to residential as a new asset class.

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## Blockchain and Digital Assets News and Trends

23 August 2021

### [BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

New information reporting requirements for cryptocurrency transactions; CFPB involvement in cryptocurrency oversight; NCUA seeks comments on use of DLT and DeFi by credit unions.

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## LatAm: Tax authorities address negative effects of the pandemic on national coffers

12 August 2021

The tax authorities' revenue-generating approaches vary from incentives to additional taxation.

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## VAT - Monthly Alert - July 2021

3 August 2021

### VAT MONTHLY ALERT

A summary of important VAT developments with implications for cross-border business operations.

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## Blockchain and Digital Assets News and Trends

19 July 2021

### BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS

IRS says tax-deferred like-kind exchange is not available for cryptocurrency trades; copyright issues plague NFTs; crypto venture investments continue to accelerate.

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## IRS concludes Section 1031 tax-deferred "like-kind" exchange treatment is not available for cryptocurrency trades

19 July 2021

It seems reasonable to assume that the IRS will apply its analysis to most cryptocurrencies.

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## Mexico: Understanding SAT's "benchmark" disclosure of effective income tax rates

14 July 2021

The effective tax rates are not binding, but it is expected that the SAT will use the rates as a reference to identify taxpayers for audits.

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## Global Tax Alert

13 July 2021

On 10 July 2021 the Law for the Prevention and Actions Against Tax Fraud (Ley de Medidas de Prevención y Lucha contra el Fraude Fiscal) was published in the Spanish Official Gazette.

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## Global Tax Alert

7 July 2021

Following the entry into force of Law 4/2020 on Digital Services Tax ("DST") (see our Tax Alert of 9 February 2021) further regulations have been recently adopted.

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## Global Tax Alert: French Supreme Administrative Court requests preliminary ruling from ECJ

6 July 2021

The French Supreme Administrative Court has requested a preliminary ruling from the European Court of Justice (ECJ).

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## Spain: Question of unconstitutionality against Royal Decree 3-2016

1 July 2021

The Spanish National Court has raised a question of unconstitutionality before the Constitutional Court of Royal Decree 3/2016, dated 2 December 2016, on the grounds that (i) it is contrary to the Spanish Constitution as it violates the limits of the power to legislate by Royal Decree and (ii) it violates the principle of economic capacity.

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## 2021 Changes to EU VAT Rules

30 June 2021

The VAT e-commerce package, consisting of EU VAT legislation aimed at simplifying VAT for cross-border e-commerce into and within the EU, is set to apply as of July 1, 2021. Our guide summarises the most noteworthy VAT implications for merchants/operators of electronic interfaces (e.g., marketplace, platform) involved in e-commerce transactions.

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## Biden Administration tax compliance plan targets cryptocurrency assets

21 June 2021

The plan would give the IRS greater authority and resources to collect information on Americans' financial assets and transactions, including cryptocurrency transactions.

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## Blockchain and Digital Assets News and Trends

21 June 2021

### [BLOCKCHAIN AND DIGITAL ASSETS NEWS AND TRENDS](#)

Biden tax plan spotlights cryptocurrency transactions; FTC announces spike in cryptocurrency investment scams; El Salvador is first country to adopt bitcoin as legal tender.

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## Amendment to the CIT Act in Poland - additional disclosure obligations to be considered

2 June 2021

On 1 January 2021, an amendment to the CIT Act came into force, which requires some taxpayers to prepare and publish information on their tax strategy for a given tax year.

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## Biden's FY 2022 budget and Treasury Green Book – additional details on international tax proposals

2 June 2021

Fleshing out revenue proposals in the White House's American Jobs Plan and American Families Plan.

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## European Commission Renames and Revises CCCTB Proposal

19 May 2021

On 18 May 2021, the European Commission presented a renamed and revised proposal for the Common Consolidated Corporate Tax Base (CCCTB). The CCCTB proposal will therefore be withdrawn by the European Commission. The new proposal is called Business in Europe: Framework for Income Taxation (BEFIT).

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## Reflections on the recently signed amendment protocol to the Dutch – German tax treaty

18 May 2021

On 4 April 2021 the Dutch government published the amendment protocol of the Dutch – German tax treaty. The amendment protocol currently is signed by both countries, but it still must be ratified by the respective parliaments.

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## Canadian international tax update: New interest deductibility restrictions and anti-hybrid rules

3 May 2020

The Canadian federal budget tabled on April 19, 2021 proposes significant new interest deductibility restrictions and anti-hybrid mismatch arrangement rules.

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## Spain implements ATAD II – our observations

30 April 2021

On 10 March 2021, the Royal Decree-Law 4/2021 (RDL 4/2021), dated 9 March 2021, was published, implementing the Council Directive (EU) 2016/1164 of 12 July 2016, amended by Council Directive (EU) 2017/952 of 28 May 2017 (ATAD II).

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## Starting shot for DAC6 reporting obligations in Spain

21 April 2021

The Royal Decree 243/2021 dated 6 April 2021 (RD 243/2021) was published in the Spanish Official Gazette, further enhancing the implementation of DAC6 in Spain through the amendment of the General Regulations on Tax Proceedings, as approved by Royal Decree 1065/2007 dated 27 July 2007.

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## Netherlands overhauls Legal Entity Tax Qualification Policy

13 April 2021

On March 29, 2021, the Dutch government published a consultation document containing a legislative proposal changing the Dutch legal entity qualification rules for tax purposes.

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## Managing Mexican mandatory disclosure rules

8 April 2021

A review of new obligations for taxpayers and advisors under Mexico's mandatory disclosure rules.

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## **Update to tax treatment of cryptoassets to incorporate staking**

6 April 2021

On 30 March 2021, Her Majesty's Revenue & Customs (HMRC) updated its Cryptoassets Manual to take into account staking in proof-of-stake networks.

HMRC confirmed that such passively earned cryptoassets will likely be subject to Capital Gains Tax or Corporation Tax on chargeable gains when the cryptoassets are subsequently sold. This position is largely the same as the established tax treatment of cryptoasset mining activities.

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## **Noteworthy rule changes impacting transfer pricing documentation requirements for fiscal year 2020 and beyond**

10 March 2021

A highlight of key transfer pricing documentation updates from various countries that are effective for fiscal year beginning on or after January 1, 2020.

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## **HM Treasury's (second) consultation on taxation of alternative fund structures**

9 March 2021

As announced at last year's Spring Budget, the government has been pursuing a review of the UK funds regime, from a tax perspective. HM Treasury (HMT) closed its second consultation on the proposals on 23 February 2021.

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## **The Netherlands initiates public consultation procedure addressing transfer pricing mismatches**

9 March 2021

Aiming to avoid non-taxation due to international transfer pricing mismatches.

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## **Luxembourg 2021 Budget bill – changes for personal tax and domestic real estate investments**

5 March 2021

In the on-going COVID-19 context, the Luxembourg Ministry of Finance has disclosed, on 14 October, several tax measures as part of the budget bill for the tax year 2021 ("Budget Bill").

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## **Country-specific guidance on the transfer pricing implications of the COVID-19 pandemic**

4 March 2021

Businesses may wish to consider the guidance from several countries on the appropriate transfer pricing treatment for governmental subsidies related to the COVID-19 pandemic.

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## **VAT - Monthly Alert – February 2021**

2 March 2021



## VAT MONTHLY ALERT

Our February summary of important VAT developments with implications for cross-border business operations.

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### COVID-19 Federal Benefit Access Tool

26 February 2021

You may access this publication in English [here](#).

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### Spain: General Tax Control Plan for 2021

22 February 2021

On 1 February 2021, the Spanish Tax and Customs Annual Plan for 2021 was published in the Official Gazette, in the context of significant tax reforms including the latest implementation of the Digital Services Tax and the Financial Transactions Tax.

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### Tax benefits due to lower WOZ assessment

15 February 2021

Property owners in the Netherlands will receive a property valuation assessment (WOZ assessment) from your municipality in the coming weeks. Critical review and objection against the WOZ assessment may result in (significant) reduction of taxes.

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### Withholding tax claims in Spain: How to maximize investment performance of foreign funds

11 February 2021

The Spanish Supreme Court (Tribunal Supremo) has recently confirmed the right to claim and obtain, by a U.S. Regulated Investment Company (RIC), the refund of withholding taxes paid on dividends received from Spanish entities.

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### Announced, proposed and implemented: Developments in Digital Services Tax in key European jurisdictions

9 February 2021

While the OECD and G20 work toward a global agreement on digital services taxes, some European countries have forged ahead on their own.

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### Announced, proposed and implemented: Key features of France's DST

9 February 2021

The French definition of "taxable service" under the DST differs from the definition of "taxable services" as used for VAT purposes.

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### Announced, proposed and implemented: Key features of Italy's DST

9 February 2021

The Italian DST applies only to revenues deriving from the provision of tax-relevant digital services linked to Italian-located users.

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## **Announced, proposed and implemented: Key features of Spain's DST**

9 February 2021

The annual worldwide revenue threshold is not limited to revenues generated by the provision of digital services, meaning that non-tech businesses may also need to comply.

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## **Announced, proposed and implemented: Key features of the United Kingdom's DST**

9 February 2021

The UK's DST is intended to be an interim measure pending a long-term global solution to the tax challenges arising from digitalization.

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## **Saudi Arabia extends tax amnesty scheme enabling international groups to regularize historic tax exposure**

1 February 2021

An increasing number of international taxpayers are using the KSA scheme.

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## **VAT - Monthly Alert – January 2021**

29 January 2021

### **VAT MONTHLY ALERT**

See our January summary of important VAT developments with implications for cross-border business operations.

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## **OECD publishes guidance on the tax impact of cross-border working arrangements during the COVID-19 pandemic**

27 January 2021

Our observations on the new OECD guidelines and their implications for employers.

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## **The Qualified Maquiladora Approach Agreement has been renewed: Implications for multinationals' transfer pricing**

26 January 2021

US-based multinationals using the maquiladora structure to manufacture goods in Mexico are taking note.

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## **Global Tax Alert: Implementation of DAC6 in Spain**

14 January 2021

On 30 December 2020, one year after the deadline imposed by the European Union, the Spanish Legal Act 10/2020 was published in the Spanish official gazette implementing the Council Directive (EU) 2018/822 of 25 May 2018 (commonly known as "DAC6").

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## **Understanding the OECD's guidance on the transfer pricing implications of the COVID-19 pandemic**

5 January 2021

A practical look at the new OECD guidance.

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### **UK VAT changes on the sale of goods to customers from 1 January 2021**

23 December 2020

With the end of the Brexit implementation period approaching at 11pm on 31 December 2020, the UK's tax authority, Her Majesty's Revenue and Customs (HMRC) on 5 October 2020, updated its guidance, "Changes to VAT treatment of overseas goods sold to customers from 1 January 2021".

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### **Belgium introduces the tax free "recovery reserve" in response to the COVID-19 pandemic**

26 November 2020

Following the introduction of the one-off carry-back of tax losses, Belgium has recently introduced a complementary measure intended to strengthen the solvency and cash-flow position of Belgian companies that have suffered a loss pursuant to the COVID-19 pandemic.

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### **Regulatory framework for CBDs and GSCs: IMF's policy paper, "Digital Money Across Borders: Macro-Financial Implications"**

23 November 2020

The Report discusses the pros and cons of two important virtual currencies: central bank digital currencies and global stable coins.

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### **Global Tax Alert: Spanish Government publishes 2021 draft Budget Act**

12 November 2020

On October 28, 2020, the Spanish government sent the draft of the 2021 Budget Act (the 2021 Budget) to the Congress for debate and approval. The 2021 Budget includes several tax measures aimed at increasing tax revenue. In this alert we want to highlight some of the main tax measures included in the 2021 Budget Act.

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### **German implementation of EU Mandatory Disclosure Rules (DAC6)**

10 November 2020

With the Act on the Introduction of an Obligation to Notify Cross-border Tax Arrangements of 21 December 2019, DAC6 was transposed into national law.

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### **VAT Monthly Alert October 2020**

2 November 2020

#### **VAT MONTHLY ALERT**

A summary of important VAT developments with implications for cross-border business operations.

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### **AEO Certification Series (I)**

27 October 2020

It is believed that most enterprises are no stranger to customs authorized economic operator (AEO) certification, and probably understand that this is a classified management approach of enterprises adopted by Customs. However, many enterprises still have reservations about whether it is necessary to apply for AEO certification and become an AEO.

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### **Oman introduces VAT: A law firm's perspective**

22 October 2020

Prudent businesses operating in Oman are already planning for the implementation of Omani VAT and have started reviewing their legal arrangements and contracts.

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### **COVID-19 British Columbia Benefit Access Tool**

21 October 2020

#### **[CANADIAN EMPLOYMENT LAW UPDATES - COVID-19](#)**

The B.C. Government has been announcing a series of measures to aid businesses and workers during this unprecedented time.

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### **DLA Piper acts for Mid Ulster District Council (as lead appellant) in successful VAT repayment claim at First Tier Tribunal**

19 October 2020

Mid Ulster District Council (formerly Magherafelt District Council), in a group litigation action, as the lead case on behalf of Northern Ireland Councils, represented by the DLA Piper London's VAT group, with Counsels Melanie Hall QC and Harry Gillow, have won an important case against HM Revenue & Customs.

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### **China Enforces Tax Collection on Employees Working for Chinese-invested Enterprises Overseas**

16 October 2020

With the recent IIT reform in 2019, and the introduction of a number of implementation rules (particularly the tax policy on overseas income), it appears the China tax authorities are taking a harder stance on how overseas income derived by China tax residents will be taxed in China, starting with Chinese expatriates working for Chinese state-owned enterprises.

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### **Luxembourg 2021 Budget bill – changes for personal tax and domestic real estate investments**

16 October 2020

In the on-going COVID-19 context, the Luxembourg Ministry of Finance has disclosed, on 14 October, several tax measures as part of the budget bill for the tax year 2021 (Budget Bill). The Budget Bill aims to increase tax and social equity as well as economic sustainability.

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### **Updated guidance on early termination and compensation payments - impact for real estate**

30 September 2020

Following the CJEU decisions in *Vodafone Portugal (C-43/19)* and *MEO (C-295/17)*, HMRC has surprisingly changed its published guidance to make it clear that early termination and compensation payments relating to commercial contracts are in most cases

consideration for goods or services and subject to VAT.

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### **Tax incentives in Puerto Rico: a quick introduction**

13 JUN 2017

Puerto Rico offers a spectrum of economic incentives aiming to promote many key industries. This handbook offers a quick look at ten of the most significant of these incentives.

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### **Japan exempts virtual currencies from consumption tax**

31 MAR 2017

Comparable treatment can be found in Europe, where EU member states exempt virtual currencies from taxation as a result of a CJEU ruling.

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### **GST to be removed from Bitcoin transactions – how best to fix the "double taxing" of digital currency?**

1 APR 2016

The Treasurer, Scott Morrison, recently announced that the Government is committed to working with the FinTech industry on legislative solutions for the GST "double tax" issues that can arise on domestic transactions involving digital currencies such as Bitcoin.

In this update we outline the issues that the Government and industry will need to consider as a part of any reform process. Given the "Netflix Tax" is intended to apply from 1 July 2017, and would apply to relevant inbound supplies of digital currency, any reforms should ideally commence prior to that date.

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### **International tax and withholding considerations for US companies and their directors**

19 MAY 2015

Multinationals commonly elect boards with international representation; it is also common to convene board meetings outside the US. US companies that do either – or both – of these things must be mindful of any resulting US or foreign tax implications

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### **Law à la Mode: Falling foul of China's trademark system; Retailers need to prepare for the new EU Data Protection Regulation; and New developments in the framework of the copyright protection of handbags**

2 FEB 2015

#### **LAW À LA MODE**

A quarterly e-magazine from our Fashion, Retail and Design Group with the latest industry news, comment and legal updates. This edition has been edited by our Italian colleagues.

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#### **Law à la Mode - Edition 14**

24 OCT 2014

## [LAW À LA MODE](#)

A quarterly e-magazine from our Fashion, Retail & Design Group with the latest industry news, comment and legal updates, with a particular focus on technology in this edition.

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### Law à la Mode

13 MAY 2014

## [LAW À LA MODE](#)

A quarterly e-magazine from our Fashion, Retail & Design Group with the latest industry news, comment and legal updates, with a particular focus on technology in this edition.

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### The Camp US tax reform proposal: what's inside?

28 FEB 2014

We analyze key provisions of this massive proposal.

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### Law à la Mode Edition 12 - Winter 2013/14

13 JAN 2014

## [LAW À LA MODE](#)

The Middle East editorial team is delighted to bring you the Winter edition of Law à la Mode, the quarterly legal magazine from our global Fashion, Retail, and design group.

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### US - Swiss voluntary disclosure program: deadlines are looming - Swiss banks need not panic, but must act swiftly and thoughtfully

21 NOV 2013

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### IRS releases long-awaited draft FFI Agreement and previews updates to FATCA regulations

5 NOV 2013

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### US DOJ and Swiss Government Announce New Voluntary Disclosure Program for Swiss Banks

4 OCT 2013

A first of its kind program enabling eligible Swiss banks to address and resolve their status re the DOJ's ongoing enforcement investigations

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## **IRS opens online FATCA registration system: financial institutions may now sign in**

20 AUG 2013

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## **OECD releases “BEPS” Action Plan – a sweeping international tax effort to combat base erosion and profit shifting**

30 JUL 2013

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## **IRS announces six-month delay in FATCA implementation**

12 JUL 2013

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## **The Eurozone crisis - what are the tax and transfer pricing risks?**

25 FEB 2013

Many companies are struggling to understand the effect the crisis may have on contracts whose payments are euro-denominated

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## **Time to "get right" with the Internal Revenue Service**

5 FEB 2013

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## **The final FATCA Regulations: highlights**

29 JAN 2013

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## **The IRS Continues to Focus on Stopping Offshore Tax Evasion and Ensuring Tax Compliance**

2 Jul 2012

The IRS continues to make strong progress in its international compliance efforts

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## **Treasury finalizes controversial nonresident alien US bank deposit reporting regulations**

30 Apr 2012

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## **Are you ready for FATCA? IRS notice provides transitional rules, but deadlines remain tight**

26 Jul 2011

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## **Supply chain planning in the post-BEPS era: five questions for MNEs**

22 JUL 2015

After BEPS actions are incorporated into OECD documents and local legislation, tax planning opportunities will still exist, but realizing the benefits of tax planning will require a greater emphasis on economic substance. One often-overlooked area of opportunity is tax-efficient supply chain planning.

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## Seminare und Veranstaltungen

### zukünftige

#### English-language webinar series: DLA Piper – Transfer Pricing Insights Germany

28 September 2022

#### [ENGLISH-LANGUAGE WEBINAR SERIES: DLA PIPER – TRANSFER PRICING INSIGHTS GERMANY](#)

Webinar

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### Vergangene

#### Webinarreihe: DLA Piper – Transfer Pricing Insights

21. September 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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#### IPEM 2022

20-22 September 2022

IPEM 2022

Cannes

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#### Webinarreihe: DLA Piper – Transfer Pricing Insights

30. Juni 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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#### English-language webinar series: DLA Piper – Transfer Pricing Insights Germany

29 June 2022

English-language webinar series: DLA Piper – Transfer Pricing Insights Germany

Webinar

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## Liquidation, acquisition and restructuring of China operations (Session 7)

June 22, 2022 | 12:00 - 1:00 pm ET

Webinar

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## Key considerations in OECD Pillar Two global minimum tax model rules

5 May 2022

Webinar

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## Key considerations in OECD Pillar Two global minimum tax model rules

5 May 2022

Webinar

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## Webinarreihe: DLA Piper – Transfer Pricing Insights

27 April 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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## Webinarreihe: DLA Piper – Transfer Pricing Insights

24. März 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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## 2022 OECD Transfer Pricing Guidelines

23 March 2022

Webseminare

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## English-language webinar series: DLA Piper – Transfer Pricing Insights Germany

17 March 2022

English-language webinar series: DLA Piper – Transfer Pricing Insights Germany

Webinar

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## International Women's Day

10 March 2022

Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

23. Februar 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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### **Beyond Politics: The Person Behind the Policies**

16 February 2022

Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

27. Januar 2022

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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### **Climate Change and Tax Policy: What Tax Directors need to know**

7 December 2021

Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

25 November 2021

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

28 October 2021

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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### **Tax treatment of software development and sale: Perspectives from the US, Australia and NZ**

28 October 2021

Webinar

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### **An update for US companies on the OECD global tax deal**

21 October 2021 | 12:00 - 1:00 ET

Webseminare

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### **Cash repatriation: What are your options?**

29 September 2021  
Webinar

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### **The essential legal update for consumer goods businesses**

29 September 2021  
Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

23 September 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **English-language webinar series: DLA Piper – Transfer Pricing Insights Germany**

22 September 2021  
English-language webinar series: DLA Piper – Transfer Pricing Insights Germany  
Webinar

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### **The Impact of Biden's Tax Proposals**

21 September 2021  
Dublin 2

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### **Embracing Digital Evolution**

15 September 2021  
Webinar

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### **IPEM 2021**

8-9 September 2021  
IPEM 2022  
Paris

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### **Session three: EU tax updates and what they mean for cross-border companies**

7 July 2021

International Tax and Transfer Pricing Webinar Series  
Webinar

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### **Luxembourg: your go-to platform for Iberoamerican investments**

30 June 2021  
Webinar

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### **EU tax updates and what they mean for US companies**

30 June 2021 | 12:00 - 1:00 ET  
Webinar

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### **English-language webinar series: DLA Piper – Transfer Pricing Insights Germany**

17 June 2021  
English-language webinar series: DLA Piper – Transfer Pricing Insights Germany  
Webinar

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### **Seminar High net-worth individuals from CEE/SEE in Austria**

17 June 2021

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

16. Juni 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

19. Mai 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **Session two: Digital Services Tax Webinar**

12 May 2021  
International Tax and Transfer Pricing Webinar Series  
Webinar

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### **Carried interest – everything you always wanted to know and didn't ask**

7 May 2021  
Luxembourg

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

28. April 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **Session one: Transfer Pricing Controversy in Europe: Insights and Solutions from the Front Lines**

21 April 2021  
International Tax and Transfer Pricing Webinar Series  
Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

23. März 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **English-language webinar series: DLA Piper – Transfer Pricing Insights Germany**

18 March 2021  
English-language webinar series: DLA Piper – Transfer Pricing Insights Germany  
Webinar

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### **Webinarreihe: DLA Piper – Transfer Pricing Insights**

25. Februar 2021  
Webinarreihe: DLA Piper – Transfer Pricing Insights  
Webseminare

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### **Outline Planning Law Update**

11 February 2021  
Webinar

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### **Lord Mandelson on global London: The City and business outside the EU in a Post-COVID-19 world**

9 February 2021  
Webseminare

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## **Webinarreihe: DLA Piper – Transfer Pricing Insights**

28. Januar 2021

Webinarreihe: DLA Piper – Transfer Pricing Insights

Webseminare

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## **The Brexit Deal - what does it mean for climate change and energy?**

26 January 2021

Webseminare

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## **Part 3: The 2020 general election results – implications of tax and economic policy for business**

12 January 2021 | 2:00 - 3:00 ET

Webinar

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## **2020 general election results: Implications for tax and economic policy for business**

2 December 2020

2020 general election results: Implications for tax and economic policy for business

Webinar

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## **2020 general election results: Implications for tax and economic policy for business**

5 November 2020 | 3:00 - 4:00 ET

2020 general election results: Implications for tax and economic policy for business

Webinar

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## **Doing Business Globally: Singapore**

4 November 2020

Webinar

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## **Challenging choices for businesses: Restructure, downsize or liquidate**

14 October 2020

Webseminare

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## **Essential Legal Update 2020**

12 October 2020 - 15 October 2020

Webinar

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## NEWS

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### **DLA Piper berät Warner Bros. Discovery bei der Neuausrichtung der Joyn-Kooperation mit ProSiebenSat.1**

20. September 2022

DLA Piper hat Warner Bros. Discovery bei einer Vereinbarung mit der ProSiebenSat.1 Media SE über ein neues Kooperationsmodell für die Streaming-Plattform Joyn, bei der die beiden Unternehmen 50:50 Partner sind, beraten.

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### **DLA Piper berät Gesellschafter des Software-Unternehmens riskmethods bei Verkauf an Sphera**

15. September 2022

DLA Piper hat die Gesellschafter der riskmethods GmbH, ein führender Anbieter von KI-gestützter Lieferketten-Risikomanagement-Software, beim Verkauf von riskmethods an Sphera beraten.

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### **DLA Piper berät Aonic bei der Investition in exmox**

24. August 2022

DLA Piper hat die Gaming-Plattform Aonic bei der Investition in das Hamburger Unternehmen exmox, einem globalen Ad-Tech- und Marketing-Unternehmen, für fast 100 Millionen US-Dollar beraten.

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### **DLA Piper berät 2Ride bei der Übernahme von CASCO**

18. August 2022

DLA Piper hat 2Ride, eines der führenden europäischen Unternehmen für die Herstellung und den Vertrieb von Schutzzubehör für Motorrad- und Skifahrer, bei der Übernahme von CASCO beraten.

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### **DLA Piper advises KGAL and Kiwoom Asset Management on the sale of Deutsche Telekom headquarters**

20 July 2022

DLA Piper has advised the South Korean asset manager Kiwoom Asset Management (Kiwoom) and KGAL GmbH & Co. KG (KGAL) on the sale of Deutsche Telekom's global headquarters located in Bonn, Germany.

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### **DLA Piper berät team.blue bei der Akquisition von Raidboxes**

20. Juli 2022

DLA Piper hat team.blue bei der Akquisition des High-Tech Gründerfonds (HTGF)-Portfoliounternehmens Raidboxes beraten.

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### **DLA Piper advises Prima Solutions in connection with the sale of Prima XL to Duck Creek**

11 July 2022

DLA Piper advised Prima Solutions, the leading French AssurTech group, on the sale of Prima XL, a reinsurance company, to Duck Creek Technology, a Nasdaq-listed provider of intelligent solutions that define the future of property and casualty insurance.

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### **Best Lawyers / Handelsblatt empfiehlt insgesamt 90 Anwältinnen und Anwälte von DLA Piper**

24. Juni 2022

Auch in diesem Jahr hat der US-Verlag Best Lawyers wieder zahlreiche Anwältinnen und Anwälte von DLA Piper in Deutschland in unterschiedlichen Rechtsgebieten ausgezeichnet.

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### **DLA Piper advises Harrison Street on sale of student accommodation assets to GSA**

12 May 2022

DLA Piper has advised Harrison Street, an investment management firm exclusively focused on alternative real estate assets, on the sale of seven purpose built student accommodation (PBSA) properties, to Global Student Accommodation (GSA).

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### **DLA Piper berät Borosil Renewables beim Erwerb von Interfloat und Brandenburger Glasmanufaktur**

6. Mai 2022

DLA Piper hat den indischen Solarglasersteller Borosil Renewables („BRL“) beim Erwerb der Interfloat Group, Europas größtem Solarglas-Produzenten, beraten.

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### **DLA Piper berät VARTA AG bei Platzierung von ESG-Schuldscheindarlehen über 250 Millionen Euro**

27. April 2022

DLA Piper hat die VARTA AG bei der Platzierung eines Schuldscheindarlehens über insgesamt 250 Millionen Euro über ein Konsortium von BayernLB, HSBC und UniCredit beraten.

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### **DLA Piper berät BASF bei Partnerschaft mit Vattenfall im Bereich Offshore-Windparks**

26. April 2022

DLA Piper hat BASF beim Abschluss einer Partnerschaft mit Vattenfall im Bereich Offshore-Windparks beraten. BASF und Vattenfall werden sich gemeinsam am Ausschreibungsverfahren für den Offshore-Windpark Hollandse Kust West (HKW) beteiligen.

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### **DLA Piper berät die Aareal Bank bei der Finanzierung eines internationalen Einzelhandelsimmobilienportfolios**

20. April 2022

DLA Piper hat die Aareal Bank AG bei der Bereitstellung einer vorrangigen Fazilität in Höhe von 360 Millionen Euro für die Finanzierung eines internationalen Einzelhandelsimmobilienportfolios der Pradera European Retail Parks SCSp beraten, die von der Pradera Europe Limited gesponsert wird.

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### **DLA Piper advises Muzinich & Co on investment in Natac Group**

19 April 2022

DLA Piper has advised Muzinich&Co, a global asset manager specialising in private debt, on the investment transaction in Grupo Natac, a leader in the botanical natural ingredients industry, also owned by Inveready.

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### **DLA Piper berät Fyllo bei der Übernahme von Semasio**

19. April 2022



DLA Piper hat Fyllo, eine Compliance-First-Plattform, die datengesteuerte Marketing- und Regulierungslösungen für wachstumsstarke Branchen anbietet, bei der Vereinbarung über den Erwerb der Anteile von Semasio, einem Pionier im Bereich Unified Targeting für digitales Marketing, beraten.

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### **DLA Piper berät NATIXIS bei der Finanzierung eines Bürogebäudes in München**

19. April 2022

DLA Piper hat die NATIXIS Pfandbriefbank AG bei der Bereitstellung einer vorrangigen Fazilität in Höhe von 70 Millionen Euro für die Finanzierung des Erwerbs eines Bürogebäudes in München durch Goldman Sachs Asset Management beraten.

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### **DLA Piper berät Francotyp-Postalia bei der Akquisition von Azolver**

24. März 2022

DLA Piper hat die Francotyp-Postalia Holding AG (FP) beim Erwerb sämtlicher Anteile an den operativen Gesellschaften der Azolver Holding GmbH (Azolver) beraten.

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### **DLA Piper berät die Hahn Gruppe beim Verkauf des Fachmarktzentrums Life in München**

11. März 2022

DLA Piper hat den von der Hahn Gruppe gemanagten „HAHN FCP-FIS German Retail Fund“ beim Verkauf des Fachmarktzentrums Life in München beraten.

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### **DLA Piper berät team.blue bei der Akquisition von iubenda**

15. Februar 2022

DLA Piper hat team.blue bei der Akquisition von iubenda, einem der führenden Datenschutz- und Compliance-Tools in Europa, beraten. iubenda wurde 2011 in Italien gegründet und unterstützt KMUs mit juristischen Lösungen, um ihre Websites und Apps datenschutzkonform zu gestalten, so dass sich die Unternehmer auf ihr Kerngeschäft konzentrieren können.

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### **DLA Piper berät Heidelberger Druckmaschinen bei der geplanten Entwicklung eines modernen HEI-TECH Industrieparks mit VGP**

20. Dezember 2021

DLA Piper advises Heidelberger Druckmaschinen AG (Heidelberg) on the planned development of a modern HEI-TECH industrial park at its Wiesloch/Walldorf site. For this purpose, Heidelberg has been able to gain a strong partner in VGP, a European provider of high-quality industrial and commercial real estate.

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## **DLA Piper berät PROJECT Immobilien beim Verkauf eines Hotelneubaus im Business Park Berlin an Premier Inn**

17. November 2021

DLA Piper hat die PROJECT Immobilien Gewerbe AG beim Verkauf eines Hotelneubaus im Business Park Berlin an eine Tochtergesellschaft der Premier Inn Holding GmbH beraten.

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## **DLA Piper berät EQT Ventures im Rahmen einer Series A-Finanzierungsrunde für Food Biotech-Startup Formo**

12. Oktober 2021

DLA Piper hat EQT Ventures bei ihrem Investment in das Berliner Food Biotech-Startup Formo im Rahmen einer Series A-Finanzierungsrunde im Umfang von 50 Mio. USD beraten. Zu den weiteren Geldgebern neben EQT Ventures gehören u.a. Elevat3 Capital, Lowercarbon Capital und Lionheart Ventures.

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## **DLA Piper berät die LINET Gruppe bei syndizierter Unternehmensfinanzierung**

12. Oktober 2021

DLA Piper hat den europäischen Medizintechnikkonzern LINET Group SE bei einer internationalen syndizierten Unternehmensfinanzierung durch die Commerzbank Aktiengesellschaft, Comercni banka, Citibank, Deutsche Bank und Ceska sporitelna beraten.

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## **DLA Piper berät Tilad beim Verkauf eines Münchener Baumarkts**

11. Oktober 2021

DLA Piper hat Tilad, ein Multi Family Office mit Sitz in Dubai, beim Verkauf eines Hornbach-Baumarkts in München-Freiham beraten.

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## **DLA Piper berät Catella Real Estate beim Erwerb einer City-Logistikimmobilie in Rheinbach**

8. Oktober 2021

DLA Piper hat die Catella Real Estate AG (CREAG) im Rahmen eines forward funding Asset Deals beim Erwerb der rd. 8.020 m<sup>2</sup> großen Projektentwicklung Industriestraße 1 in Rheinbach für den „Catella Logistik Deutschland Plus“ beraten.

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## **DLA Piper berät Gesellschafter des FinTech-Startups FastBill bei Verkauf an FreshBooks**

7. Oktober 2021

DLA Piper hat die Gesellschafter von FastBill, eine der größten Cloudlösungen für Buchhaltung und Rechnungsstellung in Deutschland, beim Verkauf von FastBill an FreshBooks, ein führender Anbieter cloudbasierter Finanzsoftware aus Kanada, beraten.

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## **DLA Piper berät Catella Real Estate beim Erwerb des „Campus 71“ in Essen für Nachhaltigkeitsfonds**

5. Oktober 2021

DLA Piper hat die Catella Real Estate AG (CREAG) beim Erwerb des Neubau-Microliving-Apartmenthauses „Campus 71“ in Essen für ihren offenen Publikumsfonds „KCD-Catella Nachhaltigkeit IMMOBILIEN Deutschland“ beraten.

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## **DLA Piper advises on the sale of Amsterdam Logistic Cityhub, the largest single-asset logistics deal in the Netherlands**

23 August 2021

DLA Piper has advised on the EUR307 million sale of Amsterdam Logistic Cityhub (ALC) to CTP, a listed developer and operator of logistic real estate. The transaction is the largest single-asset logistics deal in the Netherlands to date.

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## **DLA Piper advises founding shareholders on their sale of FloPlast and Cork Plastics by competitive auction**

30 July 2021

DLA Piper advised the founding shareholders on their sale of FloPlast Limited (UK) and the Cork Plastics Group (Ireland) following a competitive auction process.

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## **DLA Piper makes senior Tax litigation partner hire in London**

26 July 2021

DLA Piper today announces the appointment of Jason Collins, a market-leading contentious tax lawyer, as Head of its International Tax Disputes practice, based in London.

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## **DLA Piper berät PROJECT Immobilien beim Verkauf eines Büro- und Laborgebäudes im Potsdam Science Park**

29. Juni 2021

DLA Piper hat die PROJECT Immobilien Gewerbe AG beim Verkauf des Büro- und Laborgebäudes „H-Lab“ im Potsdam Service Science Park beraten. PROJECT Immobilien agiert bei diesem Projekt auch als Entwickler der Immobilie.

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## **DLA Piper berät VARTA AG bei Refinanzierung einer bestehenden Konsortialkreditlinie**

11. Juni 2021

DLA Piper hat die VARTA AG erfolgreich bei der Refinanzierung und Erweiterung einer bestehenden Konsortialkreditlinie beraten.

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## **DLA Piper berät DIC Asset AG beim Erwerb von zwei Top-Immobilien in München für rund 635 Mio. Euro**

10. Juni 2021

DLA Piper hat die DIC Asset AG, ein führendes deutsches börsennotiertes Immobilienunternehmen, beim Erwerb von zwei Büroimmobilien im Rahmen einer Off-Market-Transaktion in München beraten.

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## **DLA Piper berät Eurazeo bei Finanzierung für die Avenga Group**

9. Juni 2021

DLA Piper hat die internationale Investment-Gesellschaft Eurazeo bei einer Unternehmens- und Wachstumsfinanzierung für die Avenga Group, einem Portfoliounternehmen von Oaktree Capital Management und Cornerstone Investment Management, beraten.

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## **DLA Piper appoints new International Head for Tax**

4 May 2021

DLA Piper has appointed Jacques Wantz as International Group Head of the firm's Tax practice, with effect from 1 May 2021.

Jacques joined DLA Piper from Allen & Overy in December 2018 and is a highly regarded international tax planning lawyer. He has significant experience in international and corporate tax law, focusing on the tax aspects of cross-border private equity, real estate and debt investments and the tax structuring of regulated and unregulated investment funds. Jacques also advises on the tax elements of corporate restructurings, securitisation and capital markets transactions.

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## **DLA Piper promotes Investment Funds lawyer in Luxembourg to global partnership**

28 April 2021

DLA Piper is pleased to announce that Luxembourg-based Investment Funds lawyer Caroline Pimpaud has been promoted to partner, as part of the firm's annual promotion round, effective 1 May 2021.

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## **DLA Piper berät die Helaba bei der Finanzierung des Silberturms in Frankfurt am Main**

14. April 2021

DLA Piper hat die Landesbank Hessen-Thüringen Girozentrale (Helaba) bei der Finanzierung des Ankaufs des Landmark-Hochhauses „Silberturm“ in Frankfurt am Main beraten.

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## **DLA Piper berät Aviva Investors beim Erwerb der Immobilie „Altes Klöpperhaus“ in Hamburg von Barings**

16. März 2021

DLA Piper hat Aviva Investors, die global tätige Asset-Management-Gesellschaft des britischen Versicherers Aviva plc., beim Erwerb des Bürogebäudes „Altes Klöpperhaus“ in Hamburg für einen ihrer Kunden beraten. Verkäufer ist der global tätige Immobilien-Investmentmanager Barings.

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## **DLA Piper berät PROJECT Immobilien beim Verkauf des Büro- und Gewerbeneubau MACHWERK74**

10. März 2021

DLA Piper hat die PROJECT Immobilien Gewerbe AG beim Verkauf des Büro- und Gewerbeneubaus „MACHWERK74“ in Berlin beraten.

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## **DLA Piper berät die Darlehensgeber bei der Refinanzierung des Warnowtunnel in Rostock**

26. Februar 2021

DLA Piper hat die Darlehensgeber bei der 115 Millionen Euro Refinanzierung des Warnowtunnel in Rostock, auch bekannt als Warnowquerung, beraten.

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## **DLA Piper advised Box Inc who will acquire SignRequest**

10 February 2021

We are delighted to have advised Box Inc, who entered into a definitive agreement to acquire SignRequest, a cloud-based electronic signature company.

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## **DLA Piper advises Manulife on its acquisition of 39 Martin Place**

29 January 2021

DLA Piper has advised international financial services group Manulife Financial Corporation on its 50/50 joint venture with Investa Commercial Property Fund ("ICPF") to acquire the right to a 100% interest in 39 Martin Place, Sydney from Macquarie Group Limited (ASX: MQG).

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## **DLA Piper berät Wintershall Dea steuerrechtlich bei erfolgreicher Emission nachrangiger Anleihe im Wert von 1,5 Mrd. Euro**

27. Januar 2021

DLA Piper hat die Wintershall Dea GmbH, Europas führendes unabhängiges Erdgas- und Erdölunternehmen, steuerrechtlich bei der erfolgreichen Emission der ersten nachrangigen Anleihe in zwei Tranchen in Höhe von 1,5 Mrd. Euro beraten.

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## **DLA Piper berät Aviva Investors beim Erwerb von Bürokomplex in Stuttgart**

22. Januar 2021

DLA Piper hat Aviva Investors, die global tätige Asset-Management-Gesellschaft des britischen Versicherers Aviva plc., beim Erwerb des Bürogebäude Rotebühlstraße 121 in Stuttgart für einen ihrer Kunden beraten.

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## **DLA Piper strengthens Transfer Pricing offering with new team hire in Spain**

18 January 2021

DLA Piper is strengthening its Transfer Pricing offering in Spain with the appointment of César Salagaray as a partner in its Madrid office.

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## **DLA Piper berät Idinvest Partners bei einer Finanzierung für die Kinetics Group**

12. Januar 2021

DLA Piper hat die französische Investment-Gesellschaft Idinvest Partners bei einer Unternehmensfinanzierung für die Kinetics Group beraten.

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## **DLA Piper berät Lufthansa Group als Hauptgläubigerin im Insolvenzverfahren der ZIM Flugsitz GmbH**

11. Januar 2021

DLA Piper hat die Lufthansa Group mit ihren Gesellschaften Deutsche Lufthansa AG, Lufthansa Technik AG und SWISS als Hauptkunde und Hauptgläubiger erfolgreich im Insolvenzverfahren der ZIM Flugsitz GmbH beraten.

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## **DLA Piper berät Wipro Limited bei Übernahme von METRO-NOM GmbH und METRO Systems Romania**

4. Januar 2021

DLA Piper hat Wipro Limited, ein weltweit führendes Unternehmen für Informationstechnologie, Beratung und Geschäftsprozessmanagement, bei der Übernahme der IT-Einheiten der METRO AG – der METRO-NOM GmbH in Deutschland und der METRO Systems Romania S.R.L.– beraten.

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## **DLA Piper boosts Tax practice in Luxembourg with new partner hire**

4 January 2021

DLA Piper is pleased to announce that Luis Muñoz is joining as partner in its Tax practice, based in Luxembourg.

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## **DLA Piper berät Heidelberger Druckmaschinen AG bei der Veräußerung von Gewerbefläche am Standort Wiesloch/Walldorf**

28. Dezember 2020

DLA Piper hat die Heidelberger Druckmaschinen AG (Heidelberg) im Rahmen ihrer geplanten Standort- und Strukturoptimierungen beim Verkauf einer Fläche von rund 130.000 Quadratmetern an die VGP Gruppe beraten.

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## **DLA Piper berät Hahn Gruppe beim Verkauf des Fachmarktzentrums Pfungstadt**

22. Dezember 2020

DLA Piper hat einen institutionellen Immobilienfonds, der von der Hahn Gruppe gemanagt wird, beim Verkauf des Fachmarktzentrums Pfungstadt beraten.

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## **DLA Piper acts for Mid Ulster District Council in successful VAT repayment claim at First Tier Tribunal**

20 October 2020

DLA Piper has acted for Mid Ulster District Council (formerly Magherafelt District Council) in its successful appeal for refunds of wrongly paid VAT on leisure and recreational services, against HM Revenue & Customs, before the First Tier Tribunal. The Council won this decision as the lead nominated case on behalf of councils across Northern Ireland.

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