

# TAX

## DID YOU KNOW?

**1**

Our tax practice offers the full range of tax expertise as well as transfer pricing and tax disputes and investigations.

**2**

The practice serves a diverse client base, ranging from multinational groups and investment funds, to family offices and high-net-worth individuals.

**3**

Most of our mandates have substantial non-UK elements, giving us unrivalled experience of overseas structures and tax regimes.

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## WHAT DOES THE TEAM DO?

- M&A (tax advice on corporate, finance, equity capital markets and private equity transactions)
- Investment management (tax advice on structuring, fundraising, transactions and on-going matters for investment funds)
- Real estate tax (residential and commercial property purchases and development, real estate funds, SDLT and VAT)
- Group tax planning (structures and reorganisations and corporation tax)
- Transfer pricing
- Remuneration and personal tax (management team taxation, employment taxes, equity based incentive schemes and advice on residence and domicile)
- Tax investigations and dispute resolution

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## CLIENT PROFILE

- Corporates
- Investment funds
- Property developers/investors
- Financial institutions
- Private clients/owner managed businesses and family offices
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## WORK HIGHLIGHTS

### VERIZON COMMUNICATIONS INC.

Acting for Verizon Communications Inc. on its acquisition of Vodafone's interest in Verizon Wireless for \$130bn.

### LEGAL AND GENERAL PROPERTY

Advising Legal & General on the initial establishment and several restructurings of its Industrial Property Investment Fund, and ongoing matters relating to The Leisure Fund Limited Partnership.

### ALTRIA INC.

Advising Altria Inc. on UK tax aspects of the effect of the structure of the proposed merger of SAB Miller and Anheuser Busch Inbev, one of the largest corporate transactions of 2015.

## STANHOPE

Advising Stanhope and the purchaser on the tax aspects of the acquisition and sublet of the BBC's Media Village site in West London which was undertaken in conjunction with Mitsui Fudosan UK Ltd.

## VIRGIN

Advising long-standing client Virgin Group on the tax aspects of arrangements surrounding the agreement for Delta to acquire a 49 per cent interest in Virgin Atlantic from Singapore Airlines.

## GAME

Advising GAME Digital plc, the leading omnichannel specialist retailer of video games in the UK and Spain, on its flotation on the main London market. Our role included leading on the tax structuring of the complex pre-IPO reorganisation and the IPO itself.

## HAYFIN

Advising Hayfin on its €2bn Special Opportunities Fund and €2bn Direct Lending Fund.

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My best moment as a trainee in tax was being the only fee-earner on a large employee share scheme for a company held under a joint venture structure with a turnover of almost £3bn. Under the supervision of the partner, I was the client contact and the first port of call for questions from the client, the share valuers and the lawyers acting for the joint venture partner. It gave me a real taste for what life would be like as a qualified solicitor in tax and let me push myself whilst still ensuring I was under the watchful eye of a partner at all times!

**CATHERINE HILL,**  
SOLICITOR

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