

## MY AREAS OF EXPERTISE

- **Optimizing the corporate structure** from a legal, business, and tax perspective, structuring of corporations, partnerships, hybrid entities and joint ventures, Restructuring Tax Act
- **International Tax Law**, Mitigation of double taxation, taxation of permanent establishments, mitigation of withholding taxes, relocation, double or no tax residency, immigration and exit-taxation, Tax Treaty Law, BEPS, Multilateral Instrument, ATAD, CFC-rules, GAAR, CCTB, DAC-6 notifications
- **M&A**, Strategy consulting, deal structuring, due diligence, valuation, spa-negotiations, pre- and post deal structuring, deal-financing, management participation and incentive schemes
- Structuring of management functions, incl supervisory and advisory boards, planning of estate and business **succession** from a heuristic perspective, foundations, trusts and family offices
- Structuring and optimization of **contributions and distributions**, dealing with the contributions tax account and distribution blockers, structuring of acquisition cost.
- Optimization of **financing structure** and financing mix regarding equity, debt, mezzanine and hybrid financing, interest caps, withholding taxes, capital taxes, mitigation of capital export regulations, cash notification rules and the beneficial owner transparency regulations
- **Transfer Pricing**, structuring of intercompany transactions, valuation of value chain components, determination of transfer pricing method, calculation of transfer prices
- **Tax Controlling**, tax risk management, tax checks, internal audit, tax audits, tax rulings, advance pricing agreements, appeals, mutual agreement procedures
- **External Tax Communication**, CbC-reporting, sustainability reporting,
- **Business Reorganisation** from a management, business and tax perspective, reorganisation, refinancing, and asset protection

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