

## Tax Practice London Office



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### Who We Are

For many businesses, tax is a cost and should be managed. We agree. King & Spalding's Tax Group, a premier tax practice among US based law firms, partners with our clients to achieve such management by providing practical, user-friendly, technically sophisticated and policy-aware advice and solutions to our clients while meeting their business objectives.

“This is my top firm for tax matters; its practitioners are just outstanding.”

— *Chambers USA*

We work with clients on planning and executing business transactions of various types and sizes arising in cross border settings including acquisitions, disposals, joint ventures, fund formations, *Shari'ah* compliant transactions, tax financings, leasing, structure financing, returns to stakeholders and employee benefits.

### M&A and Corporate Finance

The way in which a business is acquired and held, financed or disposed of will have a major impact on the tax cost of the transaction and the value returned to the stakeholders.

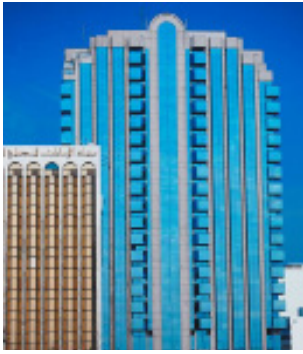
King & Spalding's Tax Group works closely with our M&A and Corporate Finance lawyers to ensure that a transaction structure works best for all stakeholders. Advising on complex and cross border multijurisdictional corporate acquisitions, disposals, reorganisations and reconstruction is a key feature of our practice.

### Funds

The proper structuring of a fund on its formation, downstream investment and upstream return is essential to enable the fund to achieve the best possible IRR for its promoters and investors. King & Spalding's Tax Group works continuously with many fund promoters raising funds, investing and ultimately divesting on a cross border basis in private equity, real estate, hedge funds, venture capital and other funds.

### Islamic Finance & Investment

King & Spalding has one of the premiere Islamic finance and investment practices. The structures adopted to achieve investment and finance on a *Shari'ah* compliant basis are complex and raise many tax issues in addition to the normal tax issues associated with fund formation, investment and financings. Our Tax Group has worked to develop a number of structures that seek to achieve tax neutrality in multiple jurisdictions for *Shari'ah* compliant funds, investors, companies and individuals in relation to their corporate, LBO and real estate investments.



## Finance, Structured Finance and Project Finance

Many banking, finance, structured and project finance transactions raise complex tax and legal issues across many jurisdictions that even the most advanced legal systems fail to adequately address. King & Spalding's Tax Group has many years of experience of developing and executing such structures and transactions, and the firm has been regularly and consistently recognised internationally for its work in this area. The Tax Group is integral in achieving successful outcomes for its clients in such transactions.

## Real Estate

Real estate investment is a complex business. The King & Spalding Tax Group works closely with the Real Estate, Corporate, Funds, Islamic Finance & Investment Groups to ensure that the tax complexities provide more opportunities for clients than costs - the identification and use of legitimate offshore investment structures, funds and REITS.

## Pass-Through Entities and Joint Ventures

King & Spalding's Tax Group has a long-standing global reputation for its expertise with pass-through entities such as partnerships and other joint ventures. Members of the Tax Group are regularly involved in complex cross-border transactions involving pass-through entities and other joint ventures and have extensive experience in structuring, negotiating and executing such transactions.

## Energy-Related Transactions

King & Spalding regularly advises companies, banks and funds in the energy sector on a wide range of issues, including UK and US cross-border and foreign-to-foreign activities. The Tax Group regularly assists the firm's extensive energy practice and advises on transactional matters as well as providing ongoing advice to clients on matters arising from their global operations. In addition, the Tax Group advises clients in connection with renewable energy transactions within the US and globally.

## General International Tax

King & Spalding has a strong focus on international tax matters, representing a wide range of multinational clients around the world. Our International Tax Practice covers the range of all international business activities. We provide ongoing advice to US-based multinational businesses concerning all US federal tax rules relevant to foreign operations, as well as general advice concerning foreign taxation. We advise from the inception of business operations in a foreign country to the disposition of a business. We have provided advice concerning business activities in virtually every country.

## Cross Border Transactions

In London, the Tax Group is uniquely positioned to provide creative and cost effective solutions for cross border investments and transactions, including acquisitions, dispositions and financings involving parties in the US, the UK and many other jurisdictions. The team's ability to deliver closely integrated UK and US advice enables the development of creative solutions that simultaneously address and resolve tax planning consideration on both sides of the Atlantic, supporting the efficient development and execution of complex cross border transactions.

### Contacts

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