BOODLE HATFIELD TAX CAPABILITY STATEMENT

Boodle Hatfield is a full service commercially oriented law firm with major practices in corporate law, commercial law, property (real estate), litigation, corporate tax and international private tax and trusts. The firm's focus lies in the high net worth sector in both business and private spheres, advising UK-based and international groups of companies, investment managers and funds, as well as private equity groups and wealthy individuals.

The firm has built on its three hundred year heritage to remain one of a select group of UK law firms providing high level services to a wealthy, international client base. Its long term client relationships have developed through implementation of its ethos of providing commercially pragmatic advice at competitive prices; combined with an absolute commitment to client care.

Commercial Taxation

Boodle Hatfield provides a full range of commercial tax advice in both transactional and planning spheres. With particular expertise in owner-managed businesses and family businesses, funds and partnership structures, our commercial tax team advise on acquisitions, reorganisations, general commercial tax planning and tax-efficient profit extraction. For inward investors we advise on suitable business structures and international tax planning.

Employee Benefits and Executive Compensation

Together with our employment law team, Boodle Hatfield's tax team advise on all aspects of employment tax including remuneration plans, taxation on benefits in kind, and termination agreements. The team has particular experience in the implementation and design of tax advantaged share and share option schemes and on advising on the tax issues affecting relocating international employees.

Local Tax and Indirect Taxes

Boodle Hatfield's commercial tax team advises our clients on all UK indirect taxes. We have considerable experience in advising our clients in relation to the complexities of Stamp Duty Land Tax and have been active in developing and implementing strategies for mitigating SDLT on property acquisitions. We routinely advise on VAT, both on day-to-day VAT issues arising (particularly in the property and fund sectors) as well as the VAT issues arising on sales and acquisitions of assets.

International Tax

Boodle Hatfield has a team of thirty lawyers in its private client and tax team, all of whom routinely advise on international tax issues affecting high net worth individuals and trusts. The commercial tax team provides strategies for inward bound commercial clients and have long-standing expertise in advising international groups on suitable international tax structures. We advise a number of clients on international tax structuring for their non-resident corporate groups in circumstances where the ultimate underlying beneficial owner is UK resident or has UK connections. We routinely advise on UK property acquisitions and tax structuring for non-residents.

Tax Controversy

Boodle Hatfield's tax group has significant experience of representing both individual and corporate clients in their disputes with the UK's taxing authorities, advising clients, where necessary, at Tax Tribunals and the higher levels of the UK's court system. Our aim is always to provide practical and commercial advice based on a sound understanding of the technical position. Our established links with HMRC and Tax Counsel enable us to keep abreast of new areas of 'interest' to HMRC and to provide clients with strategies to deal with potential enquiries.

Personal Tax Trust and Estate Planning

Boodle Hatfield offers a full range of legal services to private individuals, who form a significant and valued part of our client base. We provide advice on wealth planning, inheritance and capital gains taxes, planning for succession and on a range of international tax issues. The firm acts for numerous trustees and trust companies, both in setting up appropriate structures and with issues as they arise. Our contentious trusts and estates department provide practical solutions when problems arise in the administration of trusts and estates and they have a wealth of experience in dealing with disputes, both domestic and international.

Tax Exempt Organizations and Charities; Not-for-Profits

Boodle Hatfield has a team of lawyers who regularly advise charities and not-forprofit organisations, whether trusts or guarantee companies. We advise on all taxrelated issues, as well as on the formation, registration and dissolution of charities; the responsibilities and liabilities of charitable trustees and governing bodies; obtaining orders and schemes from the Charity Commissioners. We regularly advise individuals and families on their philanthropy programmes and have expertise on cross-border giving.



For more information on Boodle Hatfield's tax team, please contact: **Elizabeth Middleton**

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