

With 20 partners and 140 staff Mercer & Hole provides the full range of accounting advisory services to our clients. Our clients come from a broad spectrum of owner managed businesses and private clients encompassing a variety of size and complexity. The tax practice reflects this diversity. We have two specialist partners in corporate and business tax and six specialist private client partners. We have a wide range of expertise across the practice which we use in our partner led, bespoke service which adopts a holistic approach to ensure our clients receive full and appropriate advice.

Commercial Taxation

Mercer & Hole's corporate and business tax partners and staff have a great many years experience in advising clients on the UK commercial tax implications of a range of matters, including the formation and ongoing issues associated with different business entities (for example companies, partnerships and limited liability partnerships), consolidated group structures, liquidations and other winding up procedures, shareholder distributions and business reorganisations. In addition to providing ongoing planning advice to clients, we have considerable experience in dealing with such matters as acquisitions, disposals, business restructuring, demergers of two or more business streams, wherever possible optimising the availability of UK tax reliefs and deferrals.

Employee benefits and executive compensation

The Mercer & Hole tax team prides itself on its ability to offer employees and business owners with the necessary tax planning advice to both minimise tax and national insurance liabilities and, wherever possible, offer tax efficient ways of attracting, retaining and incentivising key employees. We work closely with our clients to ensure that discrepancies between different types of remuneration are utilised, to reduce the overall (ie employer and employee combined) tax leakage and to ensure that the frequent changes to both the relevant legislation and HM Revenue & Customs' practice do not adversely affect our clients' positions. Without actively marketing them ourselves, we keep abreast of the more aggressive tax mitigation strategies offered by specialist organisations, so that we are able to bring appropriate strategies to the attention of our clients.

Local tax

The Mercer & Hole tax team includes specialists with considerable experience of UK VAT issues. UK legislation frequently puts the optimal route for VAT at odds with the preferred route for other taxes and our specialists work closely with our other tax partners and managers to advise on the VAT implications of transactions being contemplated by our clients, to ensure that the best overall outcome is achieved. We offer a full range of VAT services, from routine compliance support to advice (including, where appropriate, direct liaison with HM Revenue & Customs) on more complex matters and have particular expertise in advising on property transactions and those affecting charities and other not for profit organisations.

International tax

Mercer & Hole is acutely aware of the need for appropriate UK businesses to operate within relevant transfer pricing legislation and frequently provide advice on the UK tax issues associated with, for example, inward and outward investment, activities undertaken outside the UK and on the methods by which profits may be repatriated to or from the UK. We refer to specialists within Tag Law and TIAG for advice on the non UK aspects of any transaction.

Tax controversy

The Mercer & Hole tax team includes a number of partners and staff with experience in successfully defending our clients against challenges by HM Revenue & Customs, normally without the need to have the matter heard in Court. The powers afforded the UK Revenue authorities have been significantly increased in recent years and experience in these areas – and knowledge of the limits of those powers – is invaluable in ensuring that clients do not unnecessarily prejudice their position by, for example, providing access and information to which the authorities are entitled. Our team undoubtedly has this knowledge and experience, which has also been of benefit in providing support to clients wishing to make use of recent disclosure facilities, under which individuals with undisclosed offshore assets have been able to make prescribed disclosures without incurring the penalties and sanctions normally imposed when such assets are brought to the attention of the UK Revenue authorities.

Tax exempt and not for profit organisations

Mercer & Hole acts for a number of such organisations and is able to offer support across a range of accountancy and tax services. In particular, our corporate and business tax specialists work closely with organisations looking to obtain and maintain UK tax exempt (eg charity) status and liaise with HM Revenue & Customs to ensure that the necessary criteria are met and that this status is not jeopardised. We also work with such organisations to consider both the extent and nature of trading activities and one off (for example) property transactions, since these can adversely affect the exemptions otherwise available. Other not for profit organisations do not generally qualify for general tax exemptions and it is therefore essential that they do not crystallise a tax liability which has not been provided for or anticipated; our corporate and business tax partners and managers have successfully offered practical mitigation suggestions to such organisations on a number of such occasions.

Personal Tax, Trust & Estate Planning

Mercer & Hole has a strong personal tax and trust practice and is in the top 25 firms in the UK in this area. We advise on all aspects of personal taxation and act as trustee for many UK trusts as well as providing accounting and taxation services to other trustees. Similarly we act for the estates of deceased persons as necessary. We have a particular emphasis on non UK domiciled persons and UK taxation for non UK residents and we have a specialist team dealing with this type of client. It is essential that anyone having any financial interest in the UK understands their UK taxation obligations as there are onerous penalties for non compliance and we are well placed to advise on these matters.

Contact



For more information on any of the taxation services provided by Mercer & Hole please contact:

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