Legal Services Tax



Ogier

# Ogier stands out as clearly one of the leading firms in the market.

Legal 500 Caribbean, Banking, Finance and Capital Markets, 2021

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# Who we are

Where local tax is an important consideration in an international transaction, Ogier's Tax team draws partners with specific tax expertise from each of our locations.

The depth and breadth of our knowledge ensures we can support our clients' business needs by providing access to lawyers who understand tax issues across our global network of offices.

Ogier's Tax team works hand in hand with tax departments at onshore law and accountancy firms on all aspects of cross-border advisory and transactional tax matters. Clients include financial institutions, multinational corporates, funds and asset managers.

We have drawn together partners across our offices with specific tax expertise and extensive experience of advising on key tax issues which impact on clients using or wishing to use offshore structures and those established in Luxembourg.

Ogier is uniquely placed to offer advice across the key offshore jurisdictions of the British Virgin Islands, the Cayman Islands, Guernsey and Jersey in conjunction with Luxembourg.



They are really fantastic and exceptional to work with.

> Chambers UK, Jersey, Corporate and Finance, 2021

- They are very commercial and they know what the clients want to achieve.
  Chambers Asia-Pacific,
  Hong Kong, 2021
- The team takes a hands on approach and woks well alongside the onshore legal teams.

Legal 500 UK, Guernsey, Corporate and M&A, 2021

# Tax services

- Transfers of assets within the jurisdiction related to aircraft and other high value movable assets
- Redomiciliation and migration of tax residence of companies
- Redomiciliation and migration of trusts
- Businesses wishing to establish permanent establishments in our locations (including cross jurisdictional analysis as to which of our jurisdictions is most appropriate for a given business)
- The impact of management and control on tax residence (i.e. substance) and our practical experience of how those issues are addressed in our jurisdictions
- The quoted Eurobond exemption and associated listing services on the Cayman and Channel Islands Stock Exchanges Tax issues concerning intellectual property rights
- Use of hybrid finance instruments
- Use of hybrid structures and different forms of partnership

- Use of securitisation vehicles Use of Luxembourg fund-type vehicles
- Tax issues concerning private
   wealth including advice in
   respect of trusts, companies and
   foundations as vehicles for the
   holding of private wealth and
   consideration of the taxation
   implications of changing control
   dynamics of those vehicles
- Obtaining Luxembourg income tax clearance
- Advice in relation to international agreements on exchange of information and mutual assistance
- EU legislation and Double Tax Treaties
- Advice on local property taxes, consumption taxes and other 'tax like' charges

# Contact us

# British Virgin Islands



Simon Schilder Partner, Ogier Legal L.P. +44 1534 514298 simon.schilder@ogier.com

# Guernsey



Bryon Rees Partner +44 1481 752312 bryon.rees@ogier.com

# Hong Kong



Nathan Powell
Partner
+852 3656 6054
nathan.powell@ogier.com

# Luxembourg



Aurélie Clementz
Partner
+352 691 432 024
aurelie.clementz@ogier.com

# Contacts

Beijing Room 976 Level 9, Tower 2, China Central Place No. 79 Jianguo Road, Chaoyang District Beijing 100025 China T +86 10 8509 8460 E beijing@ogier.com

## **British Virgin Islands**

Ritter House Wickhams Cay II PO Box 3170 Road Town, Tortola British Virgin Islands VG1110 T +1 284 852 7300 F +1 284 852 7450 E bvi@ogier.com

**Cayman Islands** 89 Nexus Way Camana Bay Grand Cayman Cayman Islands KY1-9009 T +1 345 949 9876 F +1 345 949 9877 E cayman@ogier.com

## Dubai

South Tower, 1003 Emirates Financial towers Dubai T +971 4 450 1900 E dubai@ogier.com

**Hong Kong** 11th Floor Central Tower 28 Queen's Road Central Central Hong Kong T +852 3656 6000 F +852 3656 6001 E hk@ogier.com

# Guernsey

Redwood House St Julian's Avenue St Peter Port Guernsey GY1 1WA T +44 1481 721672 F +44 1481 721575 E gsy@ogier.com

## Ireland

Percy Exchange 8 - 34 Percy Place Dublin 4 Ireland D04 P5K3 T+353 1 639 3000 E ireland@ogier.com

## Jersey

44 Esplanade St Helier Jersey JE4 9WG Channel Islands T +44 1534 514000 F +44 1534 514444 E jsy@ogier.com

## London

19th Floor 100 Bishopsgate London EC2N 4AG T +44 1481 721672 F +44 1534 514444 E london@ogier.com

## Luxembourg

2-4 rue Eugène Ruppert PO Box 2078 L-2453 Luxembourg T +352 2712 2000 F +352 2461 1680 E luxembourg@ogier.com

## Shanghai

Room 3671 Level 36 Shanghai International Finance Centre Tower II No. 8 Century Avenue Pudong New Area Shanghai 200120 China T +86 21 6062 6294 E shanghai@ogier.com

**Singapore** 63 Chulia St #15-01 Singapore 049514. T+86 21 5116 9188 E singapore@ogier.com

## Tokyo

Holland Hills Mori Tower RoP Suite 702 5-11-1 Toranomon Minato-ku Tokyo, 105-0001 Japan T +81 3 6402 5635 F +81 3 6402 5636 E tokyo@ogier.com