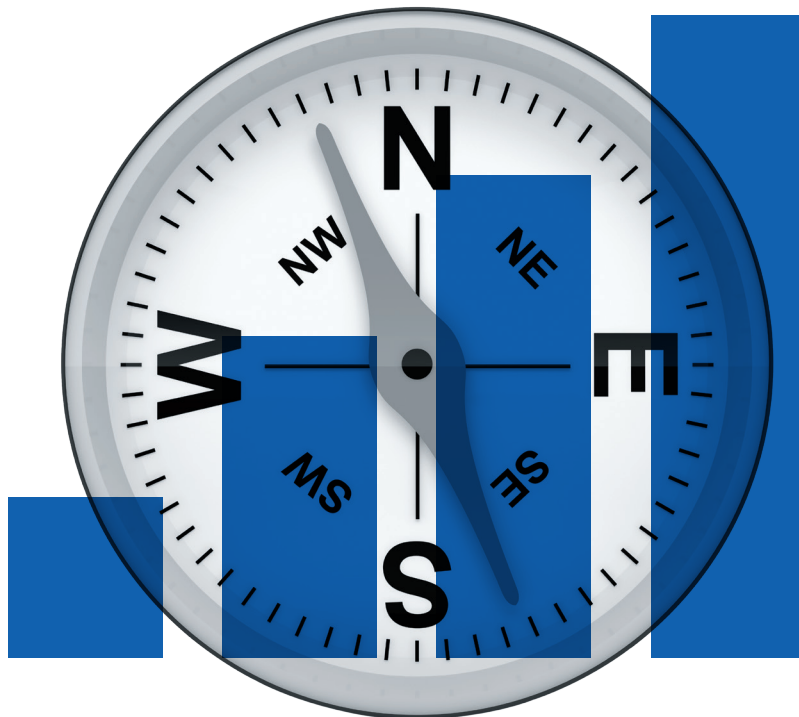


Practice Group

Taxation



Our Taxation Group features multilingual lawyers highly proficient in tax and economic matters and who are also Certified Tax Experts. As a result, we can provide our clients with innovative advice and superior, result-oriented solutions.

“
**Schellenberg
Wittmer has
knowledge and
experience across
all areas of tax. The
team comes up with
great ideas.**
”

Chambers Global

Expertise

We regularly advise clients and have extensive experience with the tax authorities, at both federal and cantonal level, in obtaining advance clearances and rulings in the following fields:

- Corporate tax issues (direct tax, stamp duty and withholding tax on profit distributions) in connection with mergers and acquisitions, restructurings and capital market transactions
- Individual taxation, including family-owned businesses, large partnerships and high-net-worth individuals in all types of Swiss federal and cantonal taxes, and advice and assistance to individuals who want to become resident in Switzerland, including coordination of international tax and legal aspects
- Executive compensation
- Swiss domestic and international tax issues (double taxation treaties and mutual assistance agreements)
- Real estate transactions
- International governmental and non-governmental organisations and non-profit entities
- Tax treatment of trusts
- VAT-related issues in connection with the financial, real estate and aviation sectors
- Enforcement procedures in the event of tax audits or suspicion of tax evasion and tax litigation

Deals and Cases

- Comprehensive advice to several major banks and financial institutions on capital market transactions and tax compliance, including obtaining tax rulings and client representation in tax-related litigation
- Advice to major insurance companies on complex reorganisations, including those with multi-jurisdictional aspects, and advising and obtaining approval of insurance products from the competent Swiss authorities
- Representation of a US-based ICT corporation in a substantial VAT claim advanced by the Swiss tax authorities with respect to its Swiss subsidiary, including preparation of a settlement proposal and negotiation of such

proposal with the authorities

- Regular tax advice to fund and asset management structures, and obtaining tax rulings on behalf of clients
- Assistance to a high-net-worth family in its wealth structuring across a number of jurisdictions and in obtaining tax rulings from the Swiss tax authorities
- Regular provision of comprehensive tax advice to several companies based in Switzerland that are part of a leading multinational technology group

Recognitions

The group and leading practitioners are highly ranked among leading law firms across international directories and publications:

- Chambers Global and Europe in Taxation
- Legal 500 in Taxation
- Lexology Index Switzerland and Corporate Taxation international guide
- World Tax Review

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“
**The lawyers at
Schellenberg Wittmer
have an excellent
ability to summarise
and explain complex
legal and tax subjects,
and they think outside
the box when it comes
to their legal
arguments.**
”

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