

LUXEMBOURG

Tax Services tailored to the Fund Industry







In an era of rapid market change and increasing regulatory complexity, we offer uniquely comprehensive tax expertise catering to all fund industry players.

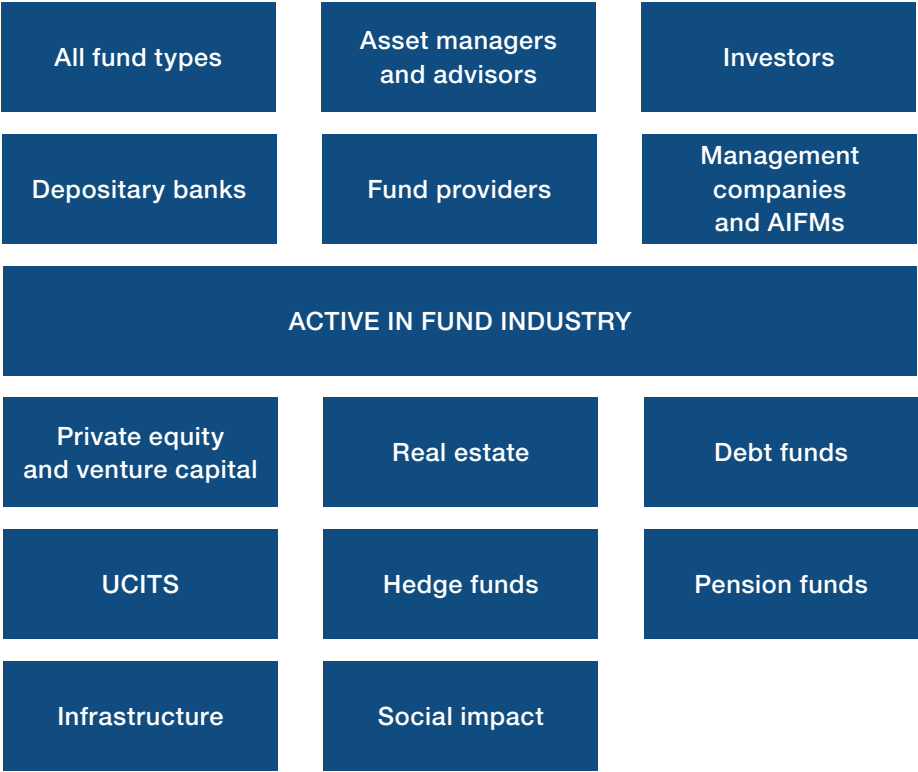
Arendt's Tax Law practice draws on the knowledge of more than 50 experts, from a range of specialised teams. These teams provide bespoke tax advice and assistance to international and Luxembourg clients, including fund promoters, managers and investors, and cover all relevant areas for fund formation and transactional projects.



“With the largest tax team of any Luxembourg law firm, we provide comprehensive services around tax, transfer pricing, VAT, tax compliance, tax litigation and accounting. Our staff of more than 50 experts led by 7 Partners make it their business to foster close relationships with clients to enable precisely tailored collaboration.”

Jan Neugebauer - Partner and Head of Tax

You are



We are experts in the full range of tax issues

Tax advisory

A multilingual team anchored firmly in Luxembourg, equipped to manage all your projects.



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Tax litigation

A multidisciplinary team able to guide you through the most complex procedures on the basis of robust long-term expertise and a formidable track record of managed cases.



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Tax & VAT compliance

A team with deep expertise in tax and VAT compliance.



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VAT & indirect taxes

Arendt has the largest team of dedicated VAT experts in any Luxembourg law firm.



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"Our highly experienced VAT team provides bespoke VAT advice and compliance services, as well as assistance with litigation."

Bruno Gasparotto - Principal; Sophie Weyten and Claire Schmitt - Counsels

Transfer pricing

Top-notch international experts with deep roots in Luxembourg.



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"Our integrated team provides a unique and comprehensive range of transfer pricing services, from research and advice on transfer pricing policies for new structures to litigation and pre-litigation assistance, including in mutual agreement procedures (MAP)."

Alain Goebel - Partner; Alexandre Maschiella - Counsel; Danny Beeton - Of Counsel

Accounting

A multifaceted business led by a renowned practitioner.



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Operational tax services (FATCA, CRS, DAC 6)

The perfect blend of legal advice and practical solutions for demanding reporting obligations.



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Personal tax, social security & reward



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"Our team understands the unique challenges of the fund sector and is committed to staying abreast of all relevant laws and regulations. We work collaboratively to develop customised remuneration tools for senior executives and fund managers, overseeing the entire process from design to implementation. We pride ourselves on our comprehensive and personalised approach to addressing our clients' needs."

Arnaud Huguenel - Counsel



We are there through every phase of fund and manager lifecycles

Project Structuring

- **Strategy**

Tailored advice on the optimal strategic approach, taking into account your commercial objectives and the current tax landscape.

- **Risk Analysis**

Identification of tax risks (withholding tax, income tax, VAT, etc.) and advice on complex areas of tax regulation such as anti-hybrid and interest limitation rules.

- **Comprehensive Advice**

Advice on the tax and transfer pricing implications of debt financing and refinancing, including deductibility, withholding tax and VAT consequences.

- **Carried Interest and Remuneration**

Tailored advice on the structuring of carried interest and manager remuneration.

Set-up

- **Stronger Foundations**

Assistance and advice during the implementation phase, including in-depth review of constitutive documents, tax risk assessment of investors and investments, and assistance in investor negotiations.

- **Transfer Pricing**

Assistance and advice on transfer pricing issues and drafting of related documentation.

- **Reporting Preparation**

Assistance and advice on tax reporting obligations such as DAC 6, CRS, FATCA and country-by-country reporting.

International Aspects

Acting as lead counsel to coordinate foreign tax advisors and local service providers for proactive risk management and the seamless execution of your project.

Day-To-Day Operations

- **Tax Questions**

Ongoing tailored advice and assistance with day-to-day accounting and tax questions (income tax, net wealth tax, withholding tax, transfer pricing, VAT, etc.)

- **Financing and Repatriation**

Assistance with all tax issues relating to debt financing and refinancing arrangements, cash repatriation mechanisms, new investments and full or partial divestments.

- **Tax Returns**

Preparation of subscription tax returns, corporate tax returns and VAT returns.

- **Reporting**

Monitoring of tax reporting concerns, e.g. relating to DAC 6, CRS, FATCA and country-by-country reporting.

- **Tax Authorities**

Assistance and advice on communication with the tax authorities, as well as any tax, transfer pricing or VAT litigation.

Fund Termination

- **Exit Strategy**

Review of planned exit strategy and arrangements, and tailored advice on the most efficient implementation solutions.

- **Complex Tax Developments**

Monitoring of complex tax-related developments to mitigate tax risks.

- **Tax Returns**

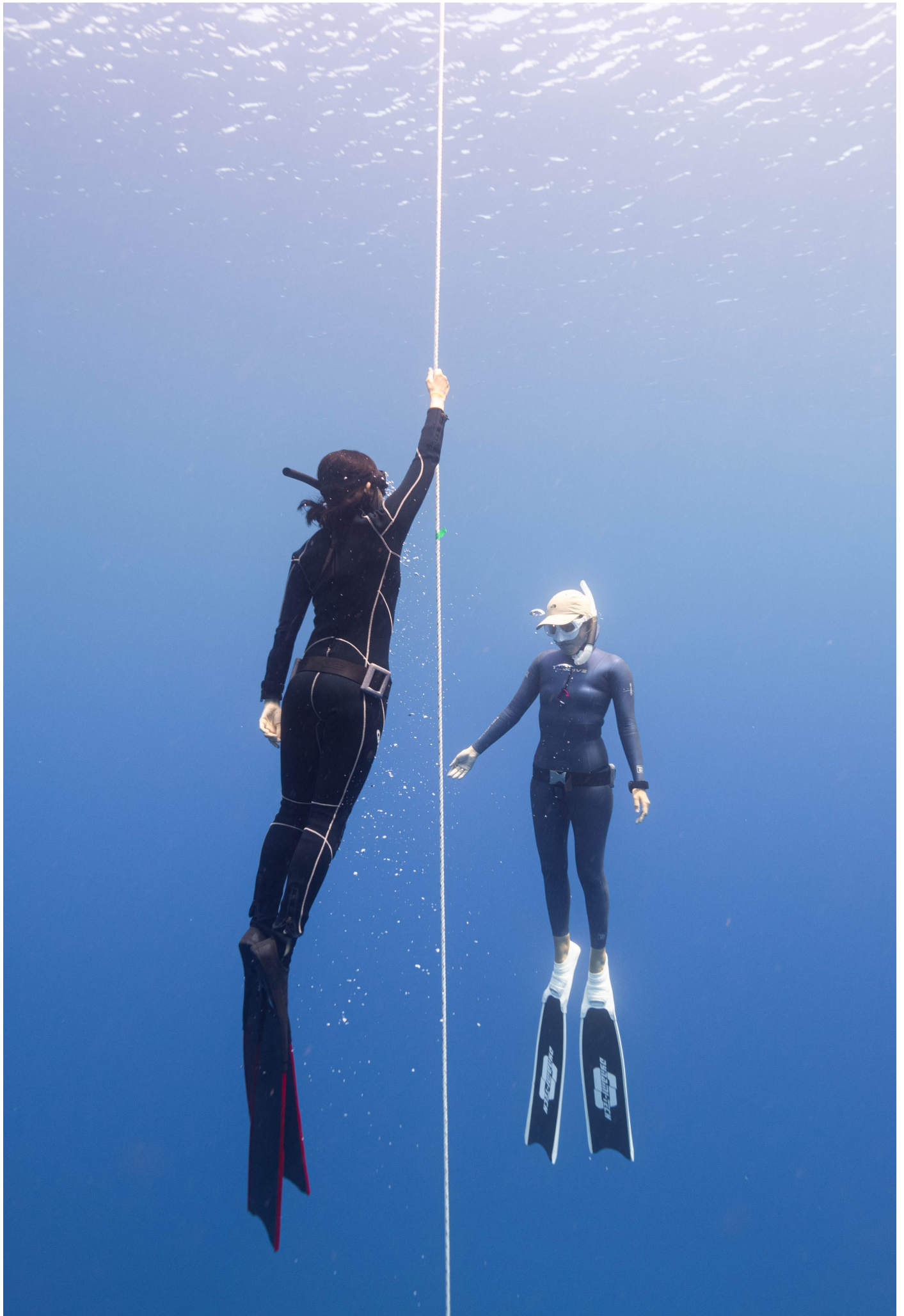
Preparation of final corporate tax or VAT returns.

- **Audit**

Management of closing audits with tax and VAT authorities.

- **Tax and VAT Certificates**

Assistance in obtaining tax and VAT certificates for liquidation.



Why work with us?

We offer comprehensive, blended services to match your goals

TAX

Transactional
advice

Reorganisation

Financing &
Refinancing

Director solutions

Fund corporate
secretarial services

Liquidation
services

Valuation

CAROL
Compliance And
Regulatory
Oversight
onLine

Central
administration
services

CSSF and BCL
reporting

Transfer agency &
Investor services

Bookkeeping,
accounting, NAV
calculation

Portfolio
management

AIFM services

Governance

Risk management

Cross-border
activities

Fund distribution

Compliance

Business &
Operations

Fund & Manager

Our international approach

Our foreign offices, Luxembourg-based foreign experts and international connections give us the geographical proximity to provide services 24/7, anticipate client needs, maintain knowledge of regulatory frameworks and enjoy privileged access to relevant authorities abroad.

1. Representative Offices

Facilitating coordination and anticipation of client needs:



“

“A strong presence in Paris allows us to offer institutional investors direct and continuous support, as well as in-depth insight into specific local regulatory and tax rules.”

Vincent Mahler - Partner, Head of the Paris tax desk

“

“With an office in the City of London, we offer UK-based asset managers a dedicated point of contact for all Luxembourg and international tax structuring matters.”

Yves Philippart de Foy - Counsel, London office

2. Country Teams

Arendt operates country teams: multidisciplinary groups of lawyers who speak local languages, with strong experience in national and international issues and in-depth knowledge of the national market and culture.



“

“With a thorough understanding of the German legal and economic environment, we can guide clients with links to Germany through the challenges impacting their business.”

Philipp Jost - Partner, Frankfurt office, Coordinator for the German market

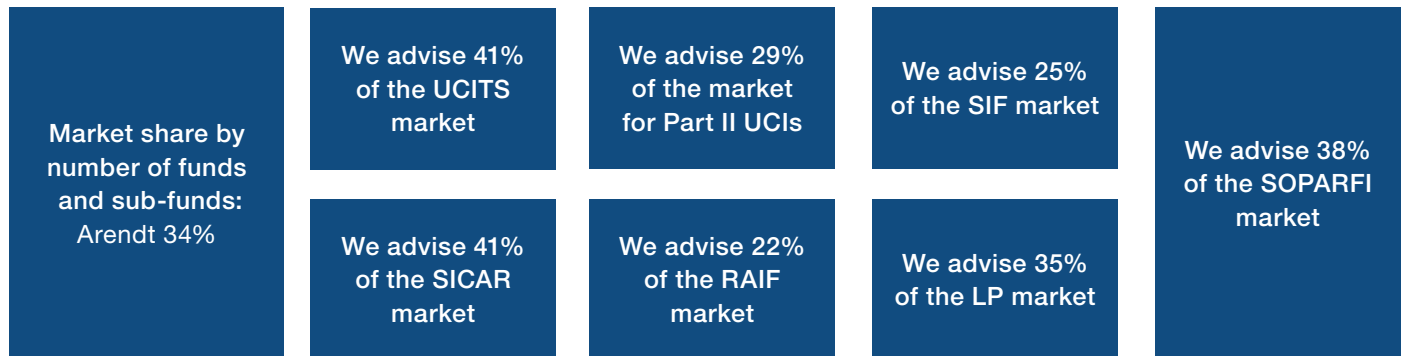
3. Global Networks

To offer our clients the best local expertise abroad and build strong relationships wherever they are, Arendt is a member of multiple legal networks of premier firms worldwide that have been vetted for their knowledge and leadership, providing seamless client service in complex cross-border matters.

Our presence in the fund market

Arendt & Medernach is the leading legal advisor to the asset management industry in Luxembourg

With a market share of 34%, Arendt & Medernach is the leading law firm in the Luxembourg fund market. We advise 5,760 funds and sub-funds (regulated and unregulated), representing USD 2.2bn in terms of value of assets under management. We advise 64% of the 30 largest promoters with funds domiciled in Luxembourg.



Includes SICAVs, FCPs and SICAFs under Part I (UCITS) and II (UCI) of the law of 17-Dec-10, Special Investment Funds (SIFs) under the law of 13-Feb-07, SICARs under the law of 15-Jun-04, RAIFs under the law of 23-July-16 and other funds in the form of a limited partnership (LP), as well as funds in the form of *sociétés de participations financières* (SOPARFI). This includes regulated and unregulated vehicles with an appointed AIFM. Sources: Monterey Insight - Luxembourg Fund Report 2024; includes regulated and unregulated funds.

Our acclaimed approach to tax services

- Leading and largest tax team among Luxembourg law firms, with 7 Partners and 50 people dedicated exclusively to tax law;
- Advice on corporate income tax, personal income tax, VAT and registration duties as well as accounting law issues
- Leader in tax structuring and transactional work for alternative investment funds
- Experienced transfer pricing team with unrivalled expertise on fund transfer pricing issues and beyond
- Support in audit procedures by Luxembourg tax authorities and in quality assurance of data reporting
- Tax litigation in all areas of tax, including VAT and transfer pricing, in local courts and before the Court of Justice of the EU
- Our tax team is continuously ranked Tier 1 in all major league tables, including Chambers and Partners, Legal 500 and International Tax Review (ITR)



"Tax team hailed by a client as "the leading tax team in Luxembourg". Clients also applaud the firm's "very good knowledge of the regulatory environment of Luxembourg"."

Chambers and Partners



"Advising 35% of funds domiciled in Luxembourg, we have an unparalleled 360° view of the fund industry, its challenges, and its opportunities. We are honoured by the high praise we frequently receive from clients for our 'truly outstanding industry knowledge', 'excellent levels of service' and 'tailormade solutions' responding to the full duration of their business lifecycles."

Thierry Lesage - Partner

Arendt at a glance

We bridge the gap between legal advice and its implementation, offering clients an integrated approach to solving their business issues

- With more than 30 years in the Luxembourg fund market, Arendt is one of the most well-established law firms in Luxembourg.
- As the market's largest law firm by company size, we always have experts available to ensure the smooth completion of your project.
- We are also the market's largest law firm by client base, whose robust structure has earned the trust of many business players in the achievement of their goals.
- With 15 different legal practice areas, we cover the full spectrum of business law in Luxembourg – a one-stop shop of excellence for all your legal needs.
- We combine legal, regulatory, tax and advisory business services in Luxembourg.
- We have been selected as the exclusive Luxembourg representative of the four leading major international legal networks providing clients with proven and recognised legal and client services from premier law firms in any jurisdiction.
- We are consistently ranked in the top tier of leading law firms in Luxembourg by most reliable legal directories and we were crowned European law firm of the year in 2024 by Chambers Europe.

Your key tax team contacts at Arendt

Partners



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