

# ATOZ

TAX ADVISERS

LUXEMBOURG



## INTERNATIONAL TAX SERVICES

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Luxembourg has crafted a unique position for itself in international business.

The tax system reflects the openness of the economy and the willingness to act as a platform for international trade and finance.

Most international groups will have some involvement in Luxembourg and few complex international transactions are now carried out without consideration of whether a Luxembourg vehicle can add value.

SOPARFI, SICAV, SICAR, FCP, H29, SPF, Sàrl, securitisation vehicles... its true that the acronyms alone can be bewildering.

Sometimes you may feel that you are spoilt for choice but don't know where to turn. We help you make sense of it all.

ATOZ's partners have been at the heart of the development of the tax system over the last 20 years and are uniquely qualified to help clients maximise the value of their business by making the most of the opportunities Luxembourg offers. Our partners and teams all come from top professional service firms and are accustomed to delivering the highest quality service in the most challenging environments.

We pride ourselves in assisting clients in structuring their business in a manner

that minimises their overall tax bill while reaching their business goals.

We don't do tax planning in a vacuum. We do gain an understanding of the business and any operational limits. We then advise on tax structures that are consistent with the business objectives and are realistic in a client's operational environment. After this, we commit to rolling our sleeves up and getting involved in the implementation and maintenance of the structure to ensure that great plans lead to great results.

Where there are difficult areas of interpretation that need to be secured by way of a confirmation from the

authorities we handle this on behalf of our clients. Our partners have been involved in obtaining confirmation on a number of groundbreaking technical positions.

ATOZ has correspondent relationships with specialised firms in all major jurisdictions.

Our International Tax experts advise on areas including:

- Holding and financing structures
- Intellectual property and royalty planning
- M&A
- Transfer pricing and commissionaire structures
- “Substance” requirements
- Investment funds and investment partnerships
- Real estate investment
- Private equity investment
- Securitisation
- Cash repatriation techniques

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TAX • CORPORATE FINANCE • CORPORATE IMPLEMENTATION SERVICES

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