

Representative Legal Matters

Aek Tantisattamo

Tax Planning and Advice

- Advised an airline on tax planning and structuring for the financing of 13 aircraft and the acquisition of 37 aircraft.
- Advised a client on tax planning and structuring the asset acquisition of a Thai international private school.
- Advised a major oil and gas corporation on tax planning and implementation for the transfer of a petroleum business and a petroleum concession.
- Advised a hotel group on tax planning and the structuring of a disposal of shares.
- Advised a US-based private equity firm on tax planning and structuring for the asset and share acquisition of a well-known cosmetics clinic.
- Advised an Australian global financial services group on financial products, including derivative warrants and tax planning and structuring for a strategic alliance model.
- Advised a leading provider of global investment management and advisory on tax planning and the tax implications of the offshore investment structure of the Government Pension Fund.
- Advised a German multinational bank, London Branch, on direct and indirect tax planning, and the implications of gold trading arrangements and structures in free zones and bonded warehouses.
- Advised an American multinational information technology company on the tax implications of the implementation of IBM's Service Integration Hub.
- Advised the world's largest cosmetics company and handled a tax audit related to transfer pricing issues.
- Advised an agricultural machinery financial service provider on tax planning, the structure of a new business model, and VAT issues for a tax audit.
- Preparing guidelines for the development of CDM projects for the Thailand Greenhouse Gas Management Organization (a public organization).



Mergers & Acquisitions

- Advising Singha Group on group restructuring and back-door listing in the Stock Exchange of Thailand.
- Advising Federal Express Corporation's integration of its local companies through a tax-free entire business transfer.
- Advising the National Housing Authority on a securitization project.
- Advising PTT Plc. on the acquisition of Bangkok Poly Ethylene Plc.
- Providing advice on the acquisition of Direct Telecom Company Limited by UTC Fire & Security Protection and Chubb Co., Ltd. (Thailand).
- Providing advice on the amalgamation of National Petrochemical Public Company Limited and Thai Olefins Public Company Limited.
- Providing advice on the business merger between Bank of Ayudhya Public Company Limited and GE Capital International Holding Corporation.
- Advising PTT Global Chemical on tax planning, structuring, and implementation for the amalgamation between PTT Chemical and PTT AR.
- Providing advice on the acquisition of shares and warrants in Rojana Industrial Park Pcl.
- Advising J&P Partners Group (Indonesia) on tax planning and the structuring of the acquisition of a gold mining business in Thailand.
- Advising Abbott Laboratories (Thailand) on the tax planning for, structuring of, and implementation of a partial business transfer and business reorganization within a group of companies (including the AbbVie Group).

Offshore Investment

- Providing advice on restructuring for foreign investment relating to the acquisition of a power business by Ratchaburi Electricity Generating Holding Public Company Limited.
- Drafting a management agreement for PTT International Company Limited for the management of its associated companies overseas.
- Preparing and reviewing a transfer pricing study and report for several multinational companies, including L'Oréal and Olam International Limited.
- Advising EGAT International on tax planning and the structuring of offshore holding companies and outbound investments in Myanmar, Laos, Indonesia, the Philippines, Vietnam, and India.

Baker McKenzie.

- Advising the Mitr Phol Group on tax planning and structuring for setting up a regional operations headquarters (ROH) in Thailand, as well as on offshore investments.
- Advising the BBTV Group on tax planning and the structuring of offshore holding companies and outbound investments in various countries.
- Advising Thai Watana Panich, a well-known publishing company, on tax planning and their offshore investment structure.
- Advising Royal Gateway on the tax planning and structuring of outbound investment, and advising on issues related to an offshore wine cooler trading company.