

## Representative Legal Matters

Ben Phillips

### **Mergers & Acquisitions**

- Advised on the tax provisions of the contractual documentation on Brooge Energy's divestment in BPGIC Group to Gulf Navigation Holding PJSC.
- Advised CVC DIF on the tax provisions, including the Pillar Two, in the sale and purchase agreement on the USD 1.03 billion investment in National Central Cooling Company PJSC (Tabreed).
- Advised Gulf Data Hub on the tax provisions to be included in the sale and purchase agreement, and negotiated the provisions with Buyer's legal counsel, on its disposal of a stake in its data centres to Kohlberg Kravis Roberts & Co. L.P.
- Advised Affinity Holdings Private Limited on the tax provisions to be included in the sale and purchase agreement, and negotiated the provisions with consortium's legal counsel, on its USD 1.01 billion disposal of a healthcare asset to a consortium.
- Advised a leading underwriter on the tax provisions for a warranty and indemnity insurance policy to be provided on multiple M&A deals in the Middle East region.
- Advising a prominent family on an acquisition of a hotel in Dubai, covering tax due diligence, tax structuring and the tax provisions in the sale and purchase agreement.
- Tax due diligence, acquisition structure and SPA support on the acquisition of a UAE based, MENA operating, telecommunication operator.

### **Restructuring and international tax structuring**

- Tax advisory on a significant investment by a UAE sovereign wealth fund in a global environmental commodities exchange and their re-domiciliation from Singapore to the UAE.
- Advised a leading fashion house on its Middle East structure as it re-evaluated its legal arrangements with its local partner.
- Advised an e-commerce platform on the proposed investment in UAE real estate, including the application of the UAE domestic minimum top up tax regime to the proposed investment.
- Restructured a UAE headquartered group in respect of its obligations under the UAE domestic minimum top up tax regime.

### **Tax advisory**

- Providing ongoing tax advice to a leading financial institution on its tax obligations in the Middle East.

- Advised a leading multinational technology company on its proposed data centre expansion in the UAE and KSA.
- Advised a leading private bank on the merger of a number of entities in the Middle East and North Africa region.
- Tax advisory to a UAE headquartered FMCG business on pre-implementation restructuring in light of the introduction of UAE corporate tax.
- Lead tax advisor to a UAE headquartered business on the application of the OECD Pillar II Model Rules (global minimum tax) and UAE corporate tax to their group operations.
- Performed initial assessments of the financial impact on businesses of the introduction of the Pillar One and Pillar Two measures, as announced by the OECD.
- Review of distribution agreements (for a number of different industries) across a number of MENA jurisdictions to understand key tax risks (such as permanent establishment) and tax leakage on payments.
- Review of existing business structures to identify any potential tax optimisation, especially in light of compliance with transfer pricing regulations.