

Representative Legal Matters

Arseny Seidov

- Developed customized structures for a large number of nonresident companies aimed at tax-efficient compliance with 2019 Russian VAT regime on B2B ESS and at minimum disruption of ongoing business operations.
- Advised a broad range of multinational companies on Russian tax issues in M&A deals, negotiation of tax-related provisions in SPAs, organization of pre-acquisition tax due diligences of Russian target companies in various industries.
- Advised clients on software licensing matters and SaaS, Paas and IaaS models, on newly established VAT regime on taxation of electronically supplied services, and ringfencing of sales activities in connection with long-term, server-based permanent establishment exposure.
- Advised several international and domestic developers of MMO games on restructuring their operations in Russia and the CIS; substance-based outbound IP migration and EULA adaptation with optimal VAT treatment, subject to newly-introduced rules on beneficial ownership, tax residency rules based on place of effective management and CFC legislation; provided tax advice aimed at improvement of games monetization through payment terminals, e-wallets / e-money, scratch cards, etc., with simultaneous compliance with statutory requirements on individual payer identification and personal data localization.
- Advised major mass media companies on domestic and cross-border tax restructuring of their Russian operations in connection with legislative changes restricting foreign ownership in local media companies and on structuring their domestic transactions, including with advertising agencies and local television companies with respect to placement of advertising on paid TV channels.
- Advised a major medical technology company on a complex and multijurisdictional tax structuring of a joint venture for onshore manufacturing and distribution of medical devices produced using world-class technology and used in sophisticated surgical procedures.
- Advised NovaWind, the division of State Atomic Energy Corporation Rosatom responsible for Russia's renewable energy program, on its joint venture with Dutch wind turbine manufacturer Lagerwey.
- Advised several major offshore contractors in the global oil and gas industry on various Russian tax and customs law matters related to the design, transportation and installation of deep-water facilities on the Russian continental shelf.
- Advised clients on establishing manufacturing operations (including toll and contract manufacturing) through tax-efficient structures, subject to regional and local tax exemptions and benefits under investment agreements and/or special tax regimes.

- Advised Brown-Forman Corporation on a complex project for the distribution of Brown-Forman's portfolio of beverage brands in the Russian market through Coca-Cola Hellenic Bottling Company Eurasia, subject to various tax, customs, and regulatory restrictions.
- Advised Costa Crociere S.p.A. on the tax aspects of an agreement with Rosmorport, a state-owned company created for the development of Russian marine transport, for a time charter of the Grand Holiday cruise ship used as a floating hotel during the 2014 Winter Olympics in Sochi.
- Advised Amsted Rail, the world's leading manufacturer of undercarriage and end-of-car railcar components, on its joint venture with United Wagon Company. The joint venture was intended to introduce the latest technology in heavy haul railway components into the freight railroading market in Russia, the CIS and other countries. Baker McKenzie advised Amsted Rail on all aspects of the transaction, including IP, corporate and M&A, antitrust and tax matters.