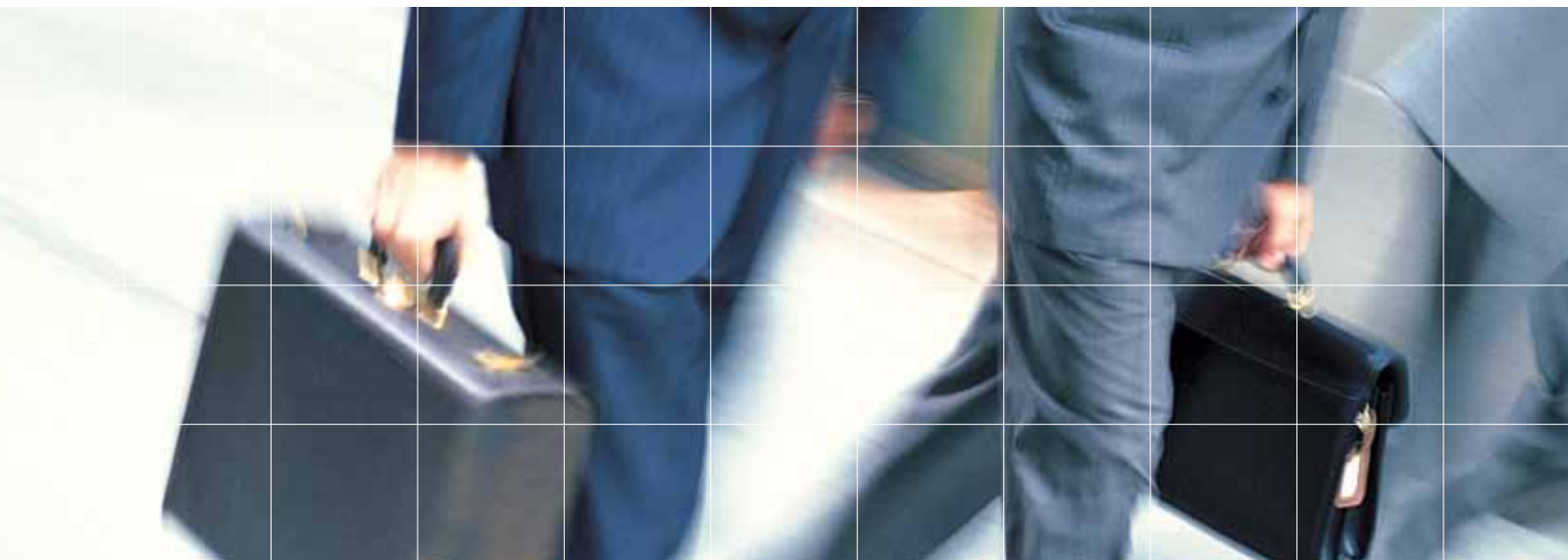




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## BRUSSELS TAX PRACTICE

In Jones Day's philosophy, a great tax lawyer not only spots the client's problems, but finds ways to resolve them that make good business sense.

The Brussels Office Tax Practice offers wide-ranging capabilities in Benelux and international taxation, including European cross-border tax planning, general corporate tax advice and international structuring of joint ventures and mergers and acquisitions, as well as assistance in connection with the tax-efficient delivery of employee benefits and executive compensation. The practice is led by Howard M. Liebman, a partner with more than 30 years of international tax experience in Europe, and Werner Heyvaert, of counsel, who has had nearly 25 years of practice in the Benelux.

### TAX PLANNING—BENELUX, EUROPE-WIDE AND BEYOND

The Benelux and European cross-border tax-planning practice primarily entails, in connection with other European offices, providing advice on the structuring of companies ranging from SMEs to international corporate groups with substantial European operations. Such work requires not only detailed knowledge of the domestic tax laws of up to 20 key jurisdictions and the various tax-treaty interrelationships connecting them, but also significant experience in the area of EU tax law, including income tax, value-added tax, excises and capital duties. In dealing with the particular concerns of US multinationals operating

overseas, the Brussels Office takes into account both the US tax aspects of international transactions (such as the impact of US transfer-pricing rules and Subpart F) and the foreign tax consequences. The Brussels Office regularly coordinates tax planning for joint ventures in Europe and has significant experience in Latin America and Asia as well.

## GENERAL CORPORATE TAX ADVICE

Our Tax team's lawyers regularly advise local and international clients as to the tax consequences of corporate transactions, including mergers, acquisitions, divestitures and joint ventures. We also represent clients in resolving tax disputes with the authorities and securing tax rulings from them. We are frequently asked to handle extensive tax due diligence assignments in connection with multijurisdictional acquisitions.

## FINANCIAL TAX COUNSELING

We regularly represent financial institutions as well as industrial and commercial companies, ranging from small to large, in a wide variety of matters, including cross-border financings, structured finance, securitization and general lending transactions. The Brussels Office, in coordination with other Jones Day offices, has also developed substantial experience in the utilization of hybrid financial instruments in cross-border transactions.

## LAWYER CONTACTS

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### BRUSSELS

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SILICON VALLEY

SINGAPORE

SYDNEY

TAIPEI

TOKYO

WASHINGTON

## TAX LITIGATION

We offer long-standing experience in representing taxpayers in Benelux and international tax litigation, whether before the administrative authorities or the courts. Our intimate knowledge of these bodies and procedures enables us to successfully guide our clients through such contentious situations.

## EMPLOYEE BENEFITS AND EXECUTIVE COMPENSATION

Jones Day Brussels assists clients in connection with the tax impact of employee benefit and executive compensation issues, both locally and beyond. Our services include advice on the structuring of international assignments and analysis of the tax treatment of stock option and profit-sharing plans in both domestic and international contexts. This is handled in close cooperation with the Firm's Labor & Employment Practice.

## ADDITIONAL INFORMATION

For additional information on our Tax Practice in Brussels, please contact your principal Jones Day representative or one of the lawyers listed in this publication. General email messages may be sent using our "Contact Us" form, which can be found at [www.jonesday.com](http://www.jonesday.com).