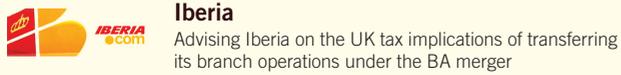
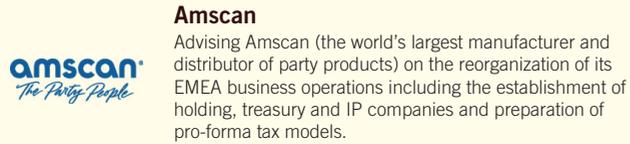
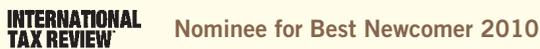


## Selected Clients



## Our Awards



# MILESTONE

# MILESTONE

Clear. Concise. Commercial.

### LONDON

Milestone International Tax Partners LLP  
45 Clarges Street  
London  
W1J 7EP

Partnership No. OC 342622

Phone: +44 (0)20 7016 5480  
Fax: +44 (0)20 7016 5481  
Email: [info@milestonetax.com](mailto:info@milestonetax.com)

### DUBLIN

Milestone International Tax Partners Ltd  
4th Floor  
Ulysses House  
Foley Street  
Dublin 1

Company No. 483099

Phone: +353 (0) 1 876 4550  
Fax: +353 (0) 1 888 1171  
Email: [info@milestonetax.com](mailto:info@milestonetax.com)

[www.milestonetax.com](http://www.milestonetax.com)

LONDON | DUBLIN

## Philosophy

Milestone is a boutique international tax practice established in Mayfair, London and Dublin, Ireland. The team is comprised of expert and dynamic lawyers who have specialised in international tax throughout their careers.

The core principles of our practice are:

- understanding our clients needs and requirements;
- investing in long term relationships with our clients; and
- being pivotal to the development of our clients' businesses.

With an emphasis on multi-jurisdictional corporate transactions we provide commercially driven tax solutions that are tailored specifically to the needs and requirements of each client.

We understand and are sensitive to the precarious balance between international and domestic tax laws and practice, double tax conventions, anti-avoidance provisions and viable and lawful tax optimisation strategies. We have developed an independent international network of like-minded tax advisors with whom we work closely.

The result is an expert, value-added service from start to finish.

## Areas of Practice

### International Corporate Transactions

Our core business is advising on complex cross-border corporate transactions where tax is a critical component to the success of a deal. Tax is also a direct cost to a business and will often impact on the strategy adopted for international expansion.

A key aspect of corporate tax structuring is the efficient repatriation of profits through the group structure. We employ traditional and cutting edge methods, combined with our detailed knowledge of international tax systems, to achieve greater shareholder returns with lower effective rates of tax across a group structure.

We advise on all aspects of international corporate transactions, such as holding and finance structures, joint ventures, restructurings, spin-offs, M&A, sale and lease-back / repo arrangements and the exploitation of intellectual property.

A fundamental concern for multinational clients, irrespective of their size, is transfer pricing. We advise clients on their transfer pricing policies, undertake benchmarking studies, carry out regular “health checks” and assist in obtaining advance rulings. We are proud to be the UK Alliance Partner of Transfer Pricing Associates an independent and specialist provider of expert transfer pricing, tax valuation and customs services, headquartered in Amsterdam.

 For more details please visit: [www.tpa-global.com](http://www.tpa-global.com)

### International Investment Funds

We have an active funds practice, advising open and closed-ended funds, hedge funds and fund of funds with a combined net asset value to date in excess of \$2 billion. We have an excellent working knowledge of the collective investment scheme rules of a number of jurisdictions including BVI, Isle of Man, Channel Islands, Cayman and Luxembourg and are able to guide our clients through the myriad considerations.

Using a top-down approach, we pay particular attention to the investor profile and asset class ensuring each investment is structured to minimise tax leakage at source and maximise internal rates of return. International real estate, film finance, mezzanine finance and fine art are just some of the alternative asset classes we have advised on. We also advise on the structuring of performance and management fees as well as the drafting of Information Memoranda, related fund documentation and contracts.

### Structured Finance

We have extensive financial derivatives experience across a number of jurisdictions. We advise on a broad range of structured derivative products to enable tax optimised solutions for new and existing transactions.

We focus on providing commercially practical solutions that:

- unlock gains/losses that can be trapped under traditional hedging structures;
- enable income conversion; and
- allow the tax efficient extraction of profits.

Our tax advice allows clients to efficiently and effectively hedge existing equity or debt positions, obtain synthetic exposure to equity or unlock capital through the creative use of tax, accounting and regulatory rules.

### International Real Estate Transactions

We advise on all tax aspects of multi-jurisdictional real estate transactions, including financing, investment, dealing, development, leasing and property sales. The primary consideration is the mitigation of tax in the target jurisdiction and the efficient repatriation of profits through to the ultimate owners.

We also ensure that the local tax implications of cross-border transactions, such as income, transfer, wealth and capital taxes are incorporated into an optimal tax solution to ensure an efficient and compliant structure for our clients.

We have advised on real estate transactions all around the world including:

<b>Australia</b>	<b>Czech Republic</b>	<b>Japan</b>	<b>Spain</b>
<b>Belgium</b>	<b>France</b>	<b>Moldova</b>	<b>Switzerland</b>
<b>Brazil</b>	<b>Germany</b>	<b>Monaco</b>	<b>Turkey</b>
<b>Bulgaria</b>	<b>Hungary</b>	<b>Netherlands</b>	<b>UK</b>
<b>Canada</b>	<b>India</b>	<b>Poland</b>	<b>Ukraine</b>
<b>Croatia</b>	<b>Italy</b>	<b>Romania</b>	<b>USA</b>

### International Private Clients

A significant feature of our practice is the advice we provide to the individuals behind the businesses we are engaged by. We offer a comprehensive private client service that focuses on preserving and transmitting the family assets and wealth of our clients in a manner that is commercially aware and sensitive to their individual needs.

We have significant experience in advising clients on the highly complex issues that multi-jurisdictional families face in relation to wealth preservation and succession planning.

We regularly advise clients on:

- the use of trusts, foundations and alternative holding entities to make investments;
- succession planning through gifts, trusts, foundations and charitable entities;
- pre-immigration planning;
- exit planning for capital gains tax purposes;
- specific planning for non-domiciled residents of the UK; and
- complex cross-border Revenue investigations.

## Biographies

### Miles Dean

**Managing Partner**

Miles is the founder of Milestone having started his career in international tax in 1994. He is the co-author of *International Tax Systems and Planning Techniques* (Sweet & Maxwell) and *The Principles of International Tax Planning* (Corpus), as well as numerous academic articles. Miles has a varied client base ranging from owner-managed businesses to international investment funds and real estate businesses.

Miles has recently advised on a number of high-profile cross-border reorganisations and real estate transactions. Miles specialises in finding bespoke, commercially workable solutions that create significant tax benefits for corporate and individual clients alike.

Miles has a Bachelor of Science and Bachelor of Laws and has taught International Tax on the LLM Program run by St Thomas University, Miami.

[miles@milestonetax.com](mailto:miles@milestonetax.com)

### Andrew Murray

**Partner**

Andrew is a co-founder of Milestone. He was previously employed by a major US investment bank where he specialised in the development of tax structured and tax enhanced derivative products and solutions. Andrew has an excellent knowledge of the tax rules applying to derivative transactions undertaken for UK, pan-European, Middle East and US clients.

Andrew also has extensive experience in the international tax aspects of mergers, acquisitions, disposals and corporate restructuring. During an eight year career at PwC in London and New Zealand he advised on several headline acquisition, exit and funding structures for private equity clients.

Andrew has a Bachelor of Laws (Hons) and a Bachelor of Arts (Economics) and was admitted as a barrister and solicitor to the New Zealand bar in 1999.

[andrew@milestonetax.com](mailto:andrew@milestonetax.com)

### Conor Delaney

**Senior Associate**

Conor joined Milestone in 2011 as a Senior Associate. He worked in a major UK law firm (Lovells) for six years where he had a broad range of experience advising on corporate/M&A, leveraged buyouts, investment funds and structured finance. He then worked for General Electric as tax counsel within the aircraft financing division.

Conor is a solicitor qualified in England and Wales, and has a Master's degree in International Taxation from Leiden University.

[conor@milestonetax.com](mailto:conor@milestonetax.com)

### Vivian E Nathan

**Managing Director (Dublin)**

Vivian is a graduate in History and Economics from UCC in 1993.

Vivian has spent his career working closely with owner manager businesses and has over 17 years' experience in practice in both Dublin and Cork. Vivian joined the practice as a partner in 2005.

Vivian specialises in providing business advisory services to progressive owner managers. He works closely with high net worth individuals providing wealth management and planning advice.

[vivian@milestonetax.com](mailto:vivian@milestonetax.com)

### Peter Roberts

**Director (Dublin)**

Peter is a Commerce graduate of UCC and a Fellow of the ACCA. Peter has worked with progressive owner manager businesses for over 25 years. He has gained experience from working in professional practices in both Ireland and the UK, culminating in the establishment of his own practice in 1997.

Peter specialises in providing corporate compliance protection and assisting clients with the development of their business. Peter believes that high value can be provided to clients in helping them to structure the future development of their business.

[peter@milestonetax.com](mailto:peter@milestonetax.com)