

# Taxes.

GSK. The Difference.

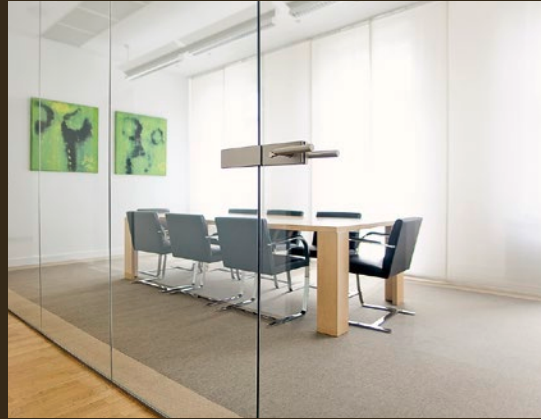


Intuition is helpful.



Know-how gets the job done.

It is good if you can rely on your instincts when you are wandering in unfamiliar terrain. But it is even better if you have a companion with you who knows the right direction. Support is indispensable when dealing with complicated tax problems. However, it has to be highly qualified support. Thanks to our experience, know-how and versatility, we quickly find excellent solutions while others are still searching. That's our promise!



# Where others are at a loss, we provide solutions.

## We create value for your business.

Mere solutions are offered by many other advisors; we offer you practical solutions. This is especially true for our tax advice. Our responsibility is to understand your business and your transactions and to accompany you in a competent, reliable and professional manner. Our advice results in added value for you. Questionable tax structures with uncertain tax effects are not our kind of business; instead, we value clear recommendations and a feeling for what is feasible. We are interested in sustainable success for our clients. With regard to your future, we discuss your plans and intentions. From experience we are aware of a broad range of aspects which can be important for the future development of your business. Together we find the right solution. Our tax team consists of experienced certified tax advisors and lawyers specialised in tax law. We can offer you a highly qualified personal contact, who will be available on a permanent basis. The transaction business is fast-moving; acquisitions and reorganisations are often time-critical. We understand that you need fast solutions. We are reachable at all times.

We do not do everything, but we deal with everything that is difficult. Our tax lawyers are specialists in the extraordinary. We focus on complex situations and demanding tax issues. Our main emphasis is to provide support in real estate transactions (asset or share deals, including acquisition structuring), M&A and reorganisations especially with respect to real estate, financial services as well as companies and groups of companies. Our tax team regularly works together with the members of other practice areas of GSK. This and a trustful relationship to your general tax adviser are extremely important for us. As a result, you receive legal advice which is integrated and comprehensive.

The range of our activities covers tax advice in connection with the following tasks:

- > Structuring of joint ventures, funds (open-end and closed-end) and other investment vehicles
- > Tax due diligence for purchasers, vendors and financing parties
- > Tax advice in negotiations with partners and financing parties, development of tax clauses for transaction agreements (purchase, sale, financing and utilisation)
- > Drawing up and implementing holding structures; structuring of inbound investments
- > Support in post-acquisition reorganisations and exit measures through merger, spin-offs, accretions, etc.
- > Optimisation of sale-and-lease back structures and project developments
- > Tax explanations for prospectuses
- > Structuring memorandums and tax opinions for all aspects of the tax law
- > Coordination with the tax authorities, assistance with tax audits, especially in obtaining advance rulings
- > Tax litigation: representing clients in tax lawsuits from the local tax-court level up to the Federal Tax Court (BFH) and even the Federal Constitutional Court (BVerfG)
- > Succession planning and the structuring of private wealth

We provide advice in national tax matters as well as in cross-border situations. Needless to say, we also advise our clients in all tax-related questions that occur in the usual day-to-day business. We advise on complex questions that arise during tax audits. Our tax team also includes experts in the field of international tax law and investment tax law.



## GSK. Who we are.

**“The difference” has existed since 1997, when GSK was created as an association of lawyers from leading commercial law firms.** Today, our clients can call upon more than 160 lawyers and certified tax advisers with outstanding reputation handling both national and international work for our clients at our offices in Berlin, Frankfurt am Main, Hamburg, Heidelberg, Munich, as well as Luxembourg. It is the close cooperation between our lawyers, in addition to their expert legal knowledge and commercial know-how that extends to an ever-increasing number of sectors, which makes all the difference for our clients. It is therefore not surprising that we are one of the leading commercial law firms in Germany and Luxembourg in the area of real estate, corporate, banking/finance and projects & public sector.

We are neither too large nor too small. This is why we are particularly efficient, competent and able to deliver in a timely manner. GSK is independent, GSK is partner-led, GSK is part of an international network. This may not be the norm, but it is very much to your benefit. The expertise of our lawyers ensures that GSK regularly advises and assists in cross-border transactions. The amicable and personal atmosphere, and working with highly qualified but small approachable teams make GSK a particularly attractive partner. Consequently, national and international businesses, banks and financial institutions, corporations and public bodies, as well as governments, ministries, supervisors and central banks enjoy working with us. Therefore, whatever your business need is, you can always expect exceptional service. Can you already feel the difference?



## There are no limits concerning special needs.

**Our clients are not constrained by borders.** Neither are we. With regard to cross-border transactions, tax consequences in different countries have to be considered. The complex interaction of the different national tax regimes and double taxation treaties bear risks, but also provide opportunities. The GSK tax team maintains close contacts with selected tax lawyers in key jurisdictions. We are active in international tax networks and are well-known specialists in the field of international tax law. Our tax lawyers have extensive experience in advising international clients. They know the way colleagues from other countries think and are able to negotiate obstacles that have to be avoided in the process of cross-border structuring. Comprehensive tax advice regarding cross-border transactions is our day-to-day business. We offer you outstanding services in both national and international matters.

Wherever your business venture will take you – we will be there with you to support and meet your needs. For cross-border transactions and international projects, GSK works closely with a select group of highly respected partner law firms abroad. As a member of a global network of renowned law firms, we are also there for you in all other markets.

For further information, please visit [www.gsk.de](http://www.gsk.de) as well as [www.gsk-lux.com](http://www.gsk-lux.com)

# GSK. Where we are.



## BERLIN

Mohrenstraße 42  
10117 Berlin  
Tel +49 30 203907-0  
Fax +49 30 203907-44  
berlin@gsk.de

## FRANKFURT/M.

Taunusanlage 21  
60325 Frankfurt am Main  
Tel +49 69 710003-0  
Fax +49 69 710003-144  
frankfurt@gsk.de

## HAMBURG

Neuer Wall 69  
20354 Hamburg  
Tel +49 40 369703-0  
Fax +49 40 369703-44  
hamburg@gsk.de

## HEIDELBERG

Mittermaierstraße 31  
69115 Heidelberg  
Tel +49 6221 4566-0  
Fax +49 6221 4566-44  
heidelberg@gsk.de

## MUNICH

Karl-Scharnagl-Ring 8  
80539 München  
Tel +49 89 288174-0  
Fax +49 89 288174-44  
muenchen@gsk.de

## LUXEMBOURG

GSK Luxembourg SA  
44, Avenue John F. Kennedy  
L-1855 Luxembourg  
Tel +352 2718 0200  
Fax +352 2718 0211  
luxembourg@gsk-lux.com

For a list of partners  
please visit [www.gsk.de](http://www.gsk.de) as  
well as [www.gsk-lux.com](http://www.gsk-lux.com)