

TAX INVESTIGATIONS AND DISPUTES

OFFERING EXPERT TAX LITIGATORS TO MITIGATE RISK AND STRESS

Our team of practitioners sits at the heart of our firm's preeminent dispute resolution practice. We don't just understand tax: we are expert litigators and can field a team of individuals with qualifications in mediation, advocacy and accountancy.

We bring our strategic and technical insights to bear in every domestic and international tax dispute to achieve positive outcomes for clients whenever we are instructed. We do so through direct engagement with tax authorities or commercial counterparties, and where necessary negotiation, alternative dispute resolution, treaty arbitration and litigation. We are also regularly engaged to assess tax risk and penalty mitigation.

When the case requires it, the team is able to call upon the services of (among others) our market leading international arbitration, corporate crime, administrative law, state aid and world trade law practitioners.

We are trusted by clients across all sectors to handle all forms of direct and indirect tax disputes and compliance matters, including:

- contentious business tax and personal tax issues
- double tax treaty and investment treaty disputes
- civil and criminal tax fraud proceedings
- tax related professional negligence and mis-selling claims
- tax related state aid, EU, and world trade law issues
- tax warranty and indemnity claims

- tax penalty mitigation and liability prevention
- third party compliance with tax investigations and penalty regimes

TAX INVESTIGATIONS AND DISPUTES NOTES - [Find the latest developments on our blog.](#)

ACCOLADES

HSF recognised as a Tier 1 firm for Tax Litigations and Investigations. Herbert Smith Freehills LLP is a '*class outfit*' with a team of '*highly competent experts*'. The practice is a one-stop shop for contentious tax advice with expertise in handling direct business tax disputes, personal tax disputes, employment tax disputes and more - **Legal 500 2022, UK**

RECENT EXPERIENCE

UBER

Defending against claims brought by a Tax QC that it owes over £1bn of VAT and interest

A MULTINATIONAL TECH COMPANY

Advising a major multinational technology company in relation to a multi-year tax audit conducted by the ATO, focussing on transfer pricing, withholding tax and tax treaty issues, as well as offshore information requests and appearances before the Senate's Tax Inquiry

AN ULTRA HIGH NET WORTH INDIVIDUAL

Suing HMRC for breach of contract in connection with the issue of assessments for over £1bn of tax and interest

BHP

Advising in Supreme Court of Queensland proceedings on its \$300m+ dispute with the Queensland Treasurer on coal royalties

A FRENCH MARINE SERVICES COMPANY

Handling a dispute and negotiations with the French tax authorities concerning an alleged permanent establishment issue

PHILIPS ELECTRONICS

Challenging successfully in the CJEU the legality of the UK's consortium relief rules

OUR PEOPLE



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