POELLATH

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Intra-group share sale: POELLATH advises Swiss corporate group on German tax structuring

POELLATH advised a Swiss corporate group on the tax structuring of a planned intra-group sale of an interest in a German company. The advice focused on the reorganization of the German shareholding structure and the potential subsequent liquidation of the existing holding company.

POELLATH compared a direct sale of the interest with a sale at holding company level and analyzed the income tax and trade tax implications, opportunities for utilizing tax losses, the choice of acquirer, and alternative restructuring options.

POELLATH coordinated its analysis from a German tax perspective and the available courses of action with the Swiss advisors.

The POELLATH team comprised:

- Dr. Katharina Hemmen (partner, private clients, Frankfurt aM)
- Dr. Laurenz Martin Lipp (counsel, private clients, Frankfurt aM)
- Dr. Jan Winkler (associate, private clients, Frankfurt aM)

About POELLATH

POELLATH is a leading German law firm with an international reach, specializing in business and tax law. With over 180 legal and tax professionals in Berlin, Frankfurt and Munich, we provide high-end advice on transactions and asset management – seamlessly combining legal and tax expertise. Our specialized practice groups don't just know the law – together with our clients, we actively shape best practices in the market. National and international rankings regularly list us among the top law firms in our core areas of expertise.

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