

Overview

The world of corporate tax is complex and ever-changing. You need a legal team that will tackle the challenges of corporate taxation and minimize your company's taxes. Dentons is adept at devising tax-efficient structures tailored to your businesses, your finances, your circumstances and your goals.

Count on our tax lawyers to streamline even the most intricate domestic and foreign corporate tax matters, including return taxes and cross-border issues. With a wealth of experience in advising public and private companies, from start-ups to many of the world's largest corporations, in a wide range of industries—from banking and finance, energy and technology to manufacturing, intellectual property and more—our team stands ready to address your every need.

Representative Experience

- **Bridgewater Systems Corporation:** Advising on its CA\$211 million acquisition by Amdocs Limited by way of plan of arrangement.
- **Capital Power Income L.P.:** Advising on its CA\$1.1 billion acquisition by Atlantic Power Corporation.
- **Energy company:** Advising on the tax aspects of the development of a greenfield sugarcane plantation, the construction of an ethanol refinery and a biomass fuelled power plant, including negotiating a tax incentives agreement with the Government of Sierra Leone.
- **Global chain of health clubs:** Advising on the structuring and tax aspects of the acquisition of the Esporta Health Clubs.
- **Global petrochemical company:** Advising on the disposal of its UK petrol stations and distribution network.
- **Katz Group Canada Inc.:** Advising on the sale of its independent pharmacy banner business conducted by Drug Trading Company Limited and all of the shares of its independent franchise retail pharmaceutical business carried on by Medicine Shoppe Canada Inc. to McKesson Canada Corporation for CA\$925 million.
- **Leading Spanish company within manufacturing in the automotive industry:** Advising on corporate, tax, employment, and litigation matters in Spain and Romania. The team helped the company to grow the business in Romania and to analyze all the legal implications regarding the company's operations in this country. The team is one of the representatives of the company's strategic committee, which values its expansion in other countries.
- **Multinational oil company:** Advising on the sale of Natural Gas Liquids (NGL) business to Plains Midstream Canada ULC, a wholly owned subsidiary, for \$1.67 billion. This is the most recent of several billion-dollar-plus transactions where Dentons has partnered with the oil company. The NGL business owns, operates and has contractual rights to assets that run the gamut of production and distribution functions, from extraction through to wholesale distribution of NGL products across Canada and in the Midwest United States. Among the assets, for example, are approximately 4,000 kilometers of pipeline systems and a storage capacity of 21 million barrels of NGLs.
- **Premier Gold Mines:** Advising with respect to its CA\$104 million acquisition of Goldstone Resources Inc. The acquisition consolidates 100 percent ownership of the Hardrock Project in Canada that is host to a multimillion-ounce National Instrument 43-101 compliant resource estimate.
- **Spanish engineering consortium operating:** Advising on a joint venture project related to the development of a nuclear power reactor located in France. Our tax teams in Spain and France advised the client on the tax treatment of the joint venture, on the establishment of a branch in France, and on the tax implications for the seconded

employees. We successfully dealt with complex CIT liability, VAT, PIT, a double tax treaty between France and Spain, and sophisticated permanent establishment issues. We helped the client to reduce tax burdens by avoiding paying double taxation in France and Spain. We also helped the client organize the arrangements between the members of the consortium.

- **US Gold Corporation:** Advising on its acquisition of Minera Andes Inc. by plan of arrangement with a transaction value at the time of closing of approximately CA\$1.4 billion for the combined company, which was renamed McEwen Mining Inc. This transaction was highlighted as a “Big Deal” in LEXPERT's April 2012 issue.