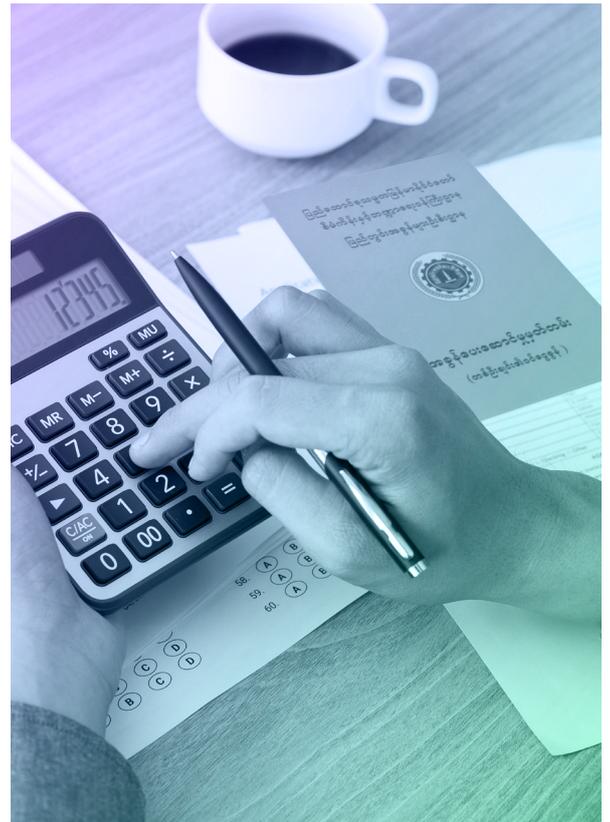


Taxation

Never mind the theory. It's the reality of the tax law that counts. Our tax team has built up a sterling reputation for the ultimate in ground connectivity and outstanding technical excellence. We are recognized as a tier-one tax practice in all of our markets. Our tax principals have trained and advised tax authorities throughout our markets, and maintain unique working relationships at various levels of administration.

We are innovative and we get to the point. We give real answers to structuring questions. On most deals, having a highly assertive tax capability as an integrated part of your advisory team is a strong advantage.

We offer a full range of tax services, comprising advisory and planning, compliance, and controversy and litigation.



Cambodia
Indonesia
Laos
Myanmar
Vietnam

COMPLIANCE

- ▶ Managed all tax and immigration compliance in Myanmar for a US multinational
- ▶ Advised on tax aspects of leasing passive infrastructure to telecom operators in Myanmar, including compliance, audit and payroll matters
- ▶ Provided a wide range of local and international clients with monthly and annual tax compliance services in Cambodia
- ▶ Provided start-up advice and assistance to an equipment supplier in the oil and gas industry
- ▶ Managed all accounting and tax compliance for a major European department store's procurement function in Myanmar
- ▶ Advised on compliance in regards to tax structuring of a major Myanmar LNG regasification project
- ▶ Advised on all tax aspects of cross-border oilfield services in Myanmar
- ▶ Assisting with cross-border aspects of tax compliance and auditing for a logistics company in Myanmar



ADVISORY

- ▶ Advising 4 supermajors on the fiscal structure of their oil and gas and pipeline interests in Myanmar
- ▶ Devised and helped negotiate tax concessions for the first petrochemical facility in Cambodia
- ▶ Assisted a global leader in beverage production and sales with the tax-efficient restructuring of its logistics chain in Myanmar
- ▶ Tax and financial planning of a 300MW hydroelectric plant in Myanmar
- ▶ Advised on tax-efficient structuring for the EPC provider of a Lao power plant construction.
- ▶ Obtained Master List (duty exemption) facilities and advised on incentives and business model options for the greenfield factory location of a listed US manufacturer in Indonesia
- ▶ Advised on structuring options regarding an airline business in Myanmar
- ▶ Advised the service provider to a major telco on the structuring of a service contract and assisted in the negotiation process
- ▶ Assisted a major industry association in lobbying the Cambodian government for changes to import regulations and tax authority interpretations
- ▶ Investment by one of the world's top three chemical producers into Myanmar
- ▶ Structuring options in relation to farm-in transactions in the oil and gas sector
- ▶ Devising innovative tax solutions for a digital E-money platform in Myanmar
- ▶ Taxation on the construction and operation of a megamall in Cambodia
- ▶ Provided a finance and accounting review for a major state-owned Myanmar enterprise for the last 3 years
- ▶ Advised major oil company on projects in Myanmar, including due diligence, liaising with authorities and advising of tax implications in relation to production sharing contracts
- ▶ Advised international construction company on stamp duty and tax implications for its Myanmar operations

“...highly praised by peers and clients alike as a seasoned and informed professional.”
- Asia Law

TRANSACTIONS

- ▶ Led, as regional tax counsel, the sale of a group of companies with subsidiaries in 8 Asian countries, acting for the seller
- ▶ Farm-in by an Australian oil company into two offshore oil & gas blocks, acting for the purchaser
- ▶ Merger of two mobile network operators in Cambodia, advising the seller on the tax structure
- ▶ Devised the tax optimal structure for a joint venture between a Japanese trading house and a local financing company in a Myanmar
- ▶ Provided tax due diligence and structuring support for an MBO and acquisition (two-stage process involving loan waivers and recharacterization) by an environmental consulting group
- ▶ Advised a major telecommunications company on the tax impact in Cambodia of restructuring Conducted tax due diligence for multinational oil and gas company's operations in Myanmar, in preparation for disposal of pipeline assets
- ▶ Sale of shares in a Myanmar hotel operator, which included tax due diligence ahead of the sale
- ▶ Acting on a US\$250 million real estate investment transaction, including due diligence on land rights, and tax implications of joint venture and financing
- ▶ Advised on tax implications of purchase of equity interest in telecommunications company which owns assets in Myanmar and Cambodia

PUBLIC SECTOR ASSISTANCE

- ▶ Engaged by the Royal Government of Cambodia for assistance in tax treaty policy and negotiation
- ▶ Providing training and advice on various tax and customs administration and policy in Myanmar
- ▶ Provided assistance on anti-dumping and safeguards, and other customs issues in Myanmar

CONTROVERSY AND LITIGATION

- ▶ Assisted the foreign owner of one of the largest investments in Laos with a dispute on tax concessions
- ▶ Advising a real estate private equity fund on land, corporate structuring and tax controversy matters in Cambodia
- ▶ Advising a Fortune 500 company in oilfield services with tax controversy matters in Cambodia
- ▶ Handled litigation, acting for a foreign-owned bank in Indonesia on a bank recovery matter
- ▶ Resolved a dispute between an oil refinery and the Indonesian tax administration



“Edwin is very good at dealing with very difficult issues; he can push things through, make things work.”
- Chambers and Partners

CONTACTS TAXATION PRACTICE



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