

**RELEASE:
FIRST INTERNATIONAL TAX CHAMBERS IN THE MIDDLE EAST**

Monday 21st March 2022.

PB First and The Cragus Group are very pleased to announce the establishment of the first International Tax Chambers in the Middle East. Based in Dubai, PB First Cragus Tax Chambers brings together recognized leading experts in various areas of International Tax. Our experts are available to provide detailed technical analysis, expert witness statements, tax policy consulting and taking the lead in tax controversy.

Areas of expertise include:

- Tax Treaties (OECD, UN and US Models):- bilateral and multilateral
- Bilateral Investment Treaties and tax
- Public International Law of Taxation
- BEPS and Pillars One and Two
- EU Directives including Economic Substance and DAC6 Reporting
- Automatic Exchange of Information including FATCA and CRS
- New tax developments and their impact on domestic tax regimes, including the proposed UAE corporation tax
- Tax controversy including MAP and arbitration
- Domestic and tax treaty definitions of Permanent Establishment
- Transfer Pricing including Country by Country
- Mergers, Acquisitions and Group Restructuring
- Equity transactions due diligence
- Debt Financing transactions, both public and private, due diligence
- Re-domiciliation of individual and corporate persons
- Digital Economy including cryptocurrencies
- Financial Services including banks, funds, managers, administrators
- Private Equity
- Commodities
- Special tax regimes for Oil and Gas Producers
- Sovereign wealth funds
- Ultrahigh net worth individuals including divorce and succession
- Institutional and Government Training
- Client structure compliance for financial institutions, corporate service providers and private banks

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Our team of experts includes:

Dr. Peter Wilson (Dubai), Co-Chair: In excess of 40 years' experience in global tax including in recent years Tax Treaties (OECD and UN):- bilateral and multilateral; Bilateral Investment Treaties; BEPS and Pillars One and Two; EU Directives including Economic Substance and DAC6 Reporting; Automatic Exchange of Information including FATCA and CRS; Debt Financing and M&A transactions, both public and private, due diligence; Financial Services including banks, funds, managers and administrators; Transfer Pricing; Ultrahigh net worth individuals including divorce and succession.

Dr. Robert Peake (Dubai), Co-Chair: In excess of 30 years' experience in global tax including in recent years Permanent Establishment; tax treaties; tax controversy; Special tax regimes for Oil and Gas producers; Digital economy; investment and trade treaties (BIT/ FTA); Investment incentives; Corporate domiciliation; Sovereign wealth funds; Kuwait and KSA direct and indirect taxation. Robert spent over ten years as an adviser to Abu Dhabi Investment Authority.

Ass. Professor Dr. Ajay Kumar (Bradford, UK/Dubai): In excess of 10 years' experience in global tax including Tax Training; public international law; tax controversy.

Abdelhamid Attalla (Dubai/Cairo): In excess of 30 years' experience both in-house and external global tax advice including: Permanent Establishment; Group restructuring; In-house tax management; Tax training; VAT; Egyptian, KSA and UAE direct and indirect taxation. Abdelhamid was regional tax manager for GE.

Matthew Moriarty (London/Dubai): In excess of 25 years' experience in global tax including in recent years: Transfer Pricing; Due diligence; Economic substance; Intellectual Property; Valuation; Transfer Pricing training; Tax controversy; Defense strategy; KSA direct taxation and UAE indirect taxation.

Kennedy Munyandi (Zambia): In excess of 20 years' experience in global tax including in recent years Tax Treaties (OECD and UN):- bilateral and multilateral involving an African counterpart; Transfer Pricing, including Country by Country; natural resources taxation; tax incentives; Institutional and Government Training. Kennedy was with the IBFD for more than 11 years lastly the Manager for Africa, Middle East and Latin America.

Dr Peter Wilson, PB First FZ-LLC: 'The growing complexity and interrelationship of tax laws intertwined with the changing global circumstances and the imminent arrival of Pillars One and Two means it is likely only clients with access to the best trained, most experienced and practical global tax advisers will likely have low tax risk into the future. PB First and The Cragus Group have formed PB First Cragus Tax Chambers to meet the client demand. With three tax PhDs in the team together with many individuals having substantial number of years practical experience, we believe we will be best placed to meet the challenge'.

For PB First enquiries please contact Bernie Steponitis at bernie.steponitis@pbfirsglobaltax.com

Dr Robert Peake, The Cragus Group: 'Multi-nationals and high net worth individuals, together with their legal and financial advisers, are looking for tax experts who provide technical and practical advice and analysis based on a deep understanding of the application of global tax concepts in local



The **CRAGUS** Group

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tax law and practice. PB First and The Cragus Group bring together individuals, with multi-disciplinary backgrounds, who have been both external advisers as well as in-house tax managers responsible for the management of tax risk'.

For The Cragus Group enquiries please contact Pranjali Gandhi-Khan at pgandhi-khan@cragus.com.