



David Haworth

Partner

Tax



technically excellent

————— Chambers Global 2019

Primary practice

Tax

About David Haworth

David is head of our international tax practice group.

David works with a range of UK and overseas-based clients, particularly in the financial sector, who need advice on the UK tax implications of their cross-border transactions.

David regularly provides support on taxation issues for corporate transactions, securitisations, debt and equity markets work and hybrid financings, and advises on tax dispute resolution. As a member of the Institute of Chartered Accountants and having worked in investment banking before joining Freshfields, David can bring a broader perspective than most other tax lawyers.

Ranked by *Chambers UK* as an 'eminent practitioner', his standing as a UK tax professional is reflected in the fact that he has been asked on a number of occasions to act as an expert witness on UK taxation in foreign tax disputes.

Recent work

- Advising Glencore on its dispute with HMRC in respect of diverted profits tax, including its judicial review challenge in the Court of Appeal.
- Advising The Equitable Life Assurance Society on the sale of its entire business to Reliance Life Limited, a subsidiary of Life Company Consolidation Group (LCCG).
- Advising AIG Life Limited on its purchase of Ellipse a specialist provider of group life risk products, from Munich Re.
- Advising ReAssure on their acquisition of the mature savings business of Legal & General.
- Advising various financial institution clients on their regulatory efficient financing structures, including on the impact of the introduction of the new hybrid and other mismatches rules, interest barrier provisions and other BEPS related provisions.

Qualifications

Education

10-1-2022

David Haworth | Freshfields Bruckhaus Deringer

- Keble College, University of Oxford, UK

Professional memberships

- Institute of Chartered Accountants in England and Wales

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