




**Dr Peter Wilson**

Dr Peter Wilson is an international tax adviser with more than 40 years of experience in assisting clients to solve tax problems in more than 75 countries. He is one of the most qualified taxation advisers in the Middle East based on academic and years of relevant experience.

### Contact

 [admin@pbfirstglobaltax.com](mailto:admin@pbfirstglobaltax.com)

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 <https://www.linkedin.com/in/dr-peter-a-wilson-676b9aa7/>

 Dubai

## Resume of Dr Peter Wilson

### Work History

Dr Peter Wilson is an international taxation adviser with more than 40 years of experience. Peter has advised companies, individuals, partnerships, trusts, foundations, collective investment funds, pension funds and governments on taxation, international tax law and associated planning and compliance, firstly from a base in Sydney, Australia, then London, New York and now in Dubai.

He also advises corporate service providers, financial institutions, investment managers, and administrators on their client taxation matters together with FATCA, CRS and ESR reporting obligations. Dr Wilson also advises on obligations and controls to be implemented for tax risk mitigation. He also assists clients in defending domestic and cross-border disputes with taxation authorities and in subsequent taxation litigation before Tribunals and Courts, together with advising family lawyers on the taxation consequences of disputed family investment entities in contested divorces. He advises clients on regulatory matters and entity (companies, partnerships, trusts, foundations, stock option schemes) formation, including countries or territories in which the entities may be formed.

Dr Wilson's practice includes the taxation considerations (including indirect and miscellaneous taxes) relevant to mergers and acquisitions, including demergers, splits and divisions; substantial public debt issuances, including restructure post-closing; cross-border financial transactions, both third party and intra-group; post-acquisition subsidiary and asset restructure; acquisition due diligence; individual and corporate redomiciliation; cross border services, intellectual property and profits; transfer pricing and international taxation conventions both bilateral and multilateral.

Over the years, he has advised clients on the cross-border taxation laws of more than 75 countries in Europe, the Middle East, Africa, the Caribbean, North and South America and Asia, including Australia and New Zealand.

Dr Wilson has a PhD in Commercial Law, written at Queen Mary, University of London on 'BRICS and International Tax Law', (graduating June 2017).

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## Work History

The Thesis, which Wolters Kluwer published as No 61 of the Series on International Taxation, January 2018, considers tax policy, avoidance and evasion, SAARS, automatic and on-request exchange of information including financial account information, Double Taxation Convention benefits, BEPS Final Action Reports, dispute resolution and anticipates the effects on the level of FDI into Brazil, Russia, India, China and South Africa, were those countries to further align their global tax policy and law with that of the developed world. The Thesis drew specific conclusions on the BRICS but did so by comparing those policy and practice features and concepts with those prevailing in the developed world.

He is the UAE subject matter expert for the ACCA in creating its Tax Certificate for the UAE Ministry of Economy, covering entity formation, consumer protection, UBO and public registers, and company and international taxation.

He also holds Master of Taxation, Master of Commerce and Bachelor of Commerce degrees from the University of NSW, Sydney, Australia, and a Graduate Diploma in Law from the University of Westminster, London. Dr Wilson is also a Fellow of the English Institute of Chartered Accountants, an Associate of the Australia and NZ Institute of Chartered Accountants, a Chartered Tax Adviser, a member of the Worshipful Company of Tax Advisers and a Freeman of the City of London. Dr Wilson is also an advisory board member of the Association of Governance Risk and Compliance.


Dr Wilson was an EY senior international tax partner based in Sydney, London and New York and, following that, a PwC senior international tax partner based in London. He has worked for boutique professional services firms, a global energy company and a global investment bank. At EY New York, he was a member of the international tax team advising Wall Street Investment banks on product financings and the head of EY's Global Oil and Gas Tax Practice.

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## Recent Client Matters


- Advising on regulatory, tax and compliance aspects of the formation of business entities in the DIFC and ADGM.
- Advising on the Irish taxation implications arising from the cancellation of part of a Eurobond.
- Advising a 40-country financial services infrastructure group on establishing an Irish finance subsidiary and restructuring over 100 intra group promissory notes to that new subsidiary.
- Advising groups on acceptable restructures in many countries including, UK, Cyprus, Ireland, Hong Kong, Singapore which avoid substantial miscellaneous tax transaction costs.
- Advising a substantial Emirati family owning more than 100 commercial properties on the options for restructuring ownership of the properties recently acquired from their deceased father's estate into a structure which minimises the prospective liability to the soon-to-be-introduced Emeriti corporate income tax while maintaining the commercial objectives of doing so including those under Sharia law.
- Advising an Australian 1.family on structuring and the taxation consequences of restructuring the ownership of a UK limited liability partnership owning UK commercial property.
- Advising an Australian family on relocating the Australian business ownership to Dubai, following by the establishment of that business in India and Germany
- Restructuring the ownership of a Luxembourg financial institution's business.
- Advising on the feasibility and taxation implications arising from establishing a stock option plan to hold stock in a multinational group.
- Refinancing of a global financial institution's third-party debt, including restructuring the ownership of more than 100 intra-group debt instruments in more than 20 countries.
- Establishing an Irish Group Treasury Company, including a request for Clearance with the Irish Revenue.
- Advising a multinational group on the taxation and structure implications of a proposal to establish an infrastructure facility in Somaliland.

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- Advising a Spanish investor on the taxation implications of an outbound transfer of an asset to a UAE business entity.
- Advising two UAE-based Australian fund manager executives on their potential obligations should they relocate to Australia
- Advising a major UK subscription-based crypto advisory business on outbound restructure opportunities.
- Providing preliminary advice to an Australian family proposing to relocate ownership of a major asset to an investment entity outside Australia when a family member relocates outside Australia to continue his employment with an international employer.
- Establishing a United States intra-group lender in a form not requiring interest receivable by it to be liable to US corporation tax.
- Advising on the business entities and taxation implications for an international investor participating in US oil and gas ownership.
- Advising a UAE resident on the liability to US corporation taxation.
- Withholding taxation on intra-group and third-party loan relationships in more than 15 countries.
- Restructuring the ownership of UK commercial property ultimately owned by two Australian resident individuals from a UK Limited Liability Partnership to a United Kingdom company.
- A Mutual Agreement Procedure between the United Arab Emirates (UAE) and Hungary.
- Establishing a UAE Foundation into which was settled 4 UAE-based trading companies with the Foundation beneficiaries being UAE residents but domiciled in Slovakia.
- An investment entity for UAE residents to invest in United Kingdom low-cost residential dwellings, including the provision of services from the UAE to the UK entity.
- The Saudi Arabia (KSA) tax, including withholding tax, implications of goods sold to a KSA company by a UK company and services provided by a related UAE company.
- Assisting a Qatari investor in his claim for damages from a Kuwait family.

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- The KSA withholding tax implications of a UK/UAE trading entity providing agency services to a KSA trading company.
- Disposal by a UAE resident of the majority ownership in a UAE company to an international holding company owned by a prominent Lebanese family.
- Restructuring the ownership of an internationally owned Ghana company to include a senior executive stock option plan based in Mauritius.
- Restructuring the ownership of a US company and an Australian company owned separately by business partners resulting in each owning 50% of both companies.
- Assisting in the defence of a Spanish client and a Portuguese client of claims by HMRC that transactions entered into some years ago are subject to the UK anti-avoidance rule, (transfer of assets abroad).
- Advising a UAE-based licensed investment adviser on the FATCA and CRS reporting obligations of four clients.
- Advising an Australian US based citizen who part owns a prominent US building materials company together with an Australian based business partner on the US and Australian tax implications of his potential relocation to Australia.
- Advising a UAE investment manager on the likely applicability of the proposed UAE corporation tax liability to its client portfolio.
- Advising a Gibraltar/Cyprus company on the taxation consequences of an initial coin offering.
- Advising a UAE family on the UAE and US tax implications arising from relocating the business to the US.
- Establishing for a UK trading company of a UAE call centre company with outsourcing arrangements with a South African company.
- Establishing for a UK investor a UAE company to establish and own a UAE-based football team.

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## Recent Client Matters

- Providing for a global accounting governance group a 20-hour course and exam questions on UAE Financial regulations ( including company law, VAT and corporate income tax) relevant to auditors to be incorporated into a curriculum prescribed by the UAE Government as a requirement for persons wishing to act as a UAE auditor.

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Our Expertise, Your Advantage