



Vittorio Salvadori di Wiesenhoff

Partner

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OVERVIEW

Vittorio Salvadori di Wiesenhoff is a partner in the firm's Milan office and is a member of the tax department. Vittorio advises on the tax aspects of financial transactions, corporate reorganizations, M&A, private equity and real estate deals, both domestic and cross-border.

More in detail, Vittorio's areas of experience include:

- M&A: structuring domestic and cross-border acquisitions for both strategic and private equity investors
- Real estate: acquisition (and connected financing) disposal and letting of large scale retail, office and logistic portfolios, tax regime applicable to real estate funds and SICAFs
- Financial markets: structured finance transactions, securitizations, purchases of non performing loans by foreign investors, Italian financial transaction tax, domestic and cross-border financing, taxation of financial instruments, tax regime applicable to collective investment undertakings
- Employee remuneration: employment incentive schemes, flexible benefit plans
- Tax litigations: handling tax audits, pre-litigation settlement procedures and tax litigations (prevalingly financial intermediaries, in relation to allegedly abusive dividend washing schemes and other structured finance trades)
- Drafting ruling applications with the Italian authorities on all aspects of tax laws.

Vittorio is ranked in Legal 500, Chambers Europe and Chambers Global. He graduated *summa cum laude* from Università Commerciale Luigi Bocconi in Milan in 1994 and was admitted as a Dottore Commercialista (chartered accountant admitted to practice in tax courts) in 1995. Of Italian mother tongue, he speaks fluent English and French.

PROFESSIONAL BACKGROUND

Prior to joining K&L Gates, Vittorio was a tax partner in the Milan office of another international law firm. He focused his practice on all tax aspects connected to corporate, banking and finance, and real estate transactions.

ACHIEVEMENTS

- Ranked by *Chambers & Partners Europe* for Tax (2021, 2020, 2019)
- Ranked by *Legal 500 EMEA 2020* for Tax
- Included by *Best Lawyers* in the 2021 list of the top lawyers in Italy for Tax

PROFESSIONAL / CIVIC ACTIVITIES

- Member of the Board and Treasurer, Plan Italy

SPEAKING ENGAGEMENTS

- 21 October 2021, Vittorio Salvadori participated with a lecture on “Internationalisation of Italian companies - tax aspects” during the event “ELITE Training RECAP” organised at SDA Bocconi School of Management by ELITE and UBS
- 24 May 2021, Vittorio Salvadori took part in the panel of the Tax & Legal Marathon on the topic of Tax aspects in the Private Equity transactions, organized by the Italian Association of Private Equity, Venture Capital and Private Debt (AIFI)
- 1 December 2020, Vittorio Salvadori held a workshop entitled "How to finance a scale-up in Italy" during the Endeavor Digital Event

EDUCATION

- Post graduation degree in tax laws, Bocconi University School of Law, 1996
- Degree in Business Administration, Bocconi University, 1994

ADMISSIONS

- Certified accountant admitted to practice in front of tax courts

LANGUAGES

- English
- French
- Italian

THOUGHT LEADERSHIP POWERED BY HUB

- 1 April 2020, COVID-19: COVID-19 and the Cura Italia Decree (*Alerts/Updates*)

- 1 April 2020, COVID-19: Dividend Distribution Policies During the Covid-19 Pandemic (*Alerts/Updates*)
- 2019, Brexit: Deal or No Deal? Regulatory and Tax Implications for the Banking and Financial Services Industry (*Articles*)
- 15 November 2018, Italian Financial Transaction Tax Implications of the Evolving Regulatory Landscape: The Post-MiFID II Financial Market Ecosystem (*Alerts/Updates*)
- 4 July 2018, Brexit: Italian Financial Transaction Tax Implications: The Market Making Exemption (*Alerts/Updates*)
- 8 August 2017, Update: Italian Parliament approves the new National Merger Filing Thresholds (*Alerts/Updates*)
- 7 April 2017, Prepared for the Border Adjustment Tax? A U.S. and Global Perspective (*Alerts/Updates*)
- 29 March 2017, The Italian Council of State Provides Welcome Clarifications Regarding the Standard of Proof That the Italian Competition Authority Must Discharge (*Alerts/Updates*)
- 22 February 2017, OECD: Italy Should Approve its Proposed Competition Legislation 'Swiftly', Including the Reform of the National Merger Filing Thresholds (*Alerts/Updates*)
- 23 January 2017, Italy Implements EU Directive on Damages for Breaches of Competition Law (*Alerts/Updates*)
- 16 November 2016, Italy to Implement EU Directive on Damages for Breaches of Competition Law (*Alerts/Updates*)
- 27 August 2015, Italian Tax Reform (*Alerts/Updates*)

OTHER PUBLICATIONS

- "Italian Financial Transaction Tax Implications of the Evolving Regulatory Landscape: The Exemption for Market Makers – An Update," tax article, 7 July 2020
- "La ricapitalizzazione delle imprese tra benefici e insidie", *Diritto24 - Il Sole 24 Ore*, 21 May 2020
- "Transfer Pricing in Italy," *Lexology*, 17 April 2018
- "Italian Financial Transaction Tax Implications of the Evolving Regulatory Landscape: The Exemption for Market Makers," first published in *Derivatives and Financial Instruments* no. 1, vol. 20, January/February 2018, published with the permission of IBFD
- "Direct Lending by Alternative Investment Funds: The Italian Regulatory and Tax Framework," *Issue: Derivatives & Financial Instruments*, 2017 (Volume 19), No. 3, 15 June 2017
- "Italy - Investing in Italian Real Estate Assets through Collective Investment Vehicles: An Overview of Tax Implications for Foreign Investors," *Derivatives and Financial Instruments* no. 4, vol. 18, July/August 2016

- Mr. Salvadori di Wiesenhoff has written several articles in “European Taxation - IBFD” and “Derivatives and Financial Instruments - IBFD.”

NEWS & EVENTS

- 25 March 2021, K&L Gates Recognized in 2021 Chambers Europe Guide (*Rankings & Recognitions*)
- August 2020, K&L Gates Lawyers Provide Insights on Impact of COVID-19 Across Various Industries (*Media Mention*)
- 26 May 2016, K&L Gates, Lawyers Earn Honors in Chambers Global, Regional Guides (*Press Release*)
- 17 February 2016, K&L Gates Names 50 New Partners (*Press Release*)
- 6 May 2015, K&L Gates, Lawyers Recognized as Leaders in Chambers Global Guides (*Press Release*)

AREAS OF FOCUS

- Corporate Tax

REPRESENTATIVE EXPERIENCE

- Assistance to a German captive investment and asset manager for real estate in relation to the acquisition of a logistic park in the neighborhood of Milan (Broni).
- Assisted the client, a global alternative investment manager, in drafting a ruling application in respect of the withholding tax regime.
- Assisted on tax aspects an Italian construction company in its debt restructuring procedure.
- Assisted on tax aspects, a US global bank, in connection with the Italian corporate law provisions governing dividend distribution and withdrawal of dividend distributions.
- Assisted a US global investment management firm in the acquisition of the real property for office use in Milan, Viale Sarca.
- Assisted on tax aspects a US global investment management firm in the acquisition of an office building in Milan, Corso di Porta Vigentina.
- Assisted an international broker-dealer on the availability of the Italian financial transaction tax exemption for market makers in respect of cash equity trades executed in the context of a banking group post Brexit linked settlement structure.
- Assisted the client, a paper & forest products company based in Lombardy, Italy on Tax aspects for an incentive plan.

- Assisted on tax aspects a German automotive group in the acquisition of a Varese-based company specialized in the production of flexible hoses in plastic materials for the technical and industrial sectors, agriculture, boating, construction, transport and food.
- Assisted a German automotive group in the acquisition from a telco company a line of business dedicated to the design and development of a future generation of ultrasonic sensors for parking aid systems. Our assistance involved the negotiation and revision of the sale and purchase agreement. The tax department, in particular, advised the client in respect of the tax qualification of the transaction and in the drafting and reviewing of all relevant tax clauses in the SPA.
- Assisted the client, an Italian primary asset manager, related to the acquisition by a fund, managed by the client, of a real estate asset for office use located in Rome - Via Laurentina.
- Assisted an Italian company involved in private equity and alternative asset management investments, in its entering into a Euro 100,000,000 loan from an Italian securitisation SPV backed by a German banking group and a Japanese financial company, in particular with regards to the tax aspects.
- Assisted the alternative investments fund, as lender, managed by an Italian Asset Management Company, in an innovative direct lending transaction, in favor of an Italian company located in Trento which builds, develops and sells wooden houses.
- Assisted a leading global US investment banking group on Italian Financial Transaction Tax aspects.
- Assisted the European branch of a US investment management company on the financial transaction tax exemption for registered market makers charged to clients in respect of equity trades in the Chicago Board Options Exchange (CBOE) markets.
- Assisted a US investment management company on Italian financial transaction tax matters.
- Assisted a US multinational investment bank and financial services company regarding Italian financial transaction tax regime applicable to transactions in Italian equities executed by client.
- Assisted on tax aspects an Italian company specialized in the recycling and waste-handling sector in the structuring its foreign activities and in the incorporation of subsidiaries in Malta, Hungary, Bulgaria and Romania.
- Assistance to a new Italian real estate investment fund managed by the Italian branch of a British real estate asset manager and sponsored by a US privately-held alternative investment firm, focusing on real estate investments with particular reference to the logistic sector, in the filing of a ruling application with the Italian tax authorities in respect of the withholding tax regime applicable to dividend distributions. The Italian tax authorities, in their response, confirmed the interpretation and the approach outlined in our ruling application.
- Assisted a large scale investment manager on tax aspects for the acquisition of a real estate complex and lease to an Italian online fashion retailer.
- Assisted the client, a Swiss real estate fund, in connection with the acquisition of a building in Via Roma, Turin and in its post-closing activities.

- Assisted a credit institution incorporated in Switzerland, which is principally regulated by the Swiss Financial Market Supervisory Authority, in respect of the Italian financial transaction tax regime applicable to periodic auctions.