

Vittorio Salvadori di Wiesenhoff

Partner

Milan
+39.02.3030.2948

vittorio.salvadori@klgates.com

OVERVIEW

Vittorio Salvadori di Wiesenhoff is a partner and 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 (prevailingly 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

- Recognised by *Chambers Europe* for Tax in Italy, 2019-2026
- Recognised by *The Legal 500 EMEA* as a Leading Partner for Tax in Italy, 2023-2026
- Recognised in *The Best Lawyers in Italy*™ for Tax Law with a special focus on Securitization, 2025
- Recognised by *The Legal 500 EMEA* for Tax in Italy, 2019-2023
- Ranked by *MilanoFinanza* in "The Best Lawyers and the Best Corporate Firms 2021" as a "Selected Lawyer" for M&A Tax Advisory

PROFESSIONAL / CIVIC ACTIVITIES

- Chairman of the Board of Statutory Auditors of Il Sole 24 Ore S.p.A. (2025-2028)
- Member of the Tax & Legal Commission of AIFI (the Italian Association of Private Equity, Venture Capital and Private Debt)
- Member of the Board and Treasurer, Plan Italy

SPEAKING ENGAGEMENTS

- Speaker, “Securitization as an investment tool,” Canova Club and K&L Gates Milan, 22 October 2026
- Speaker, “Irish Funds Milan Seminar,” Irish Funds Association, 24 October 2024
- Speaker, “Corporate Governance: creating value in times of transition,” ELITE, 26 January 2023
- Speaker, “ELITE Training RECAP,” ELITE and UBS at SDA Bocconi School of Management, addressing the tax aspects of the internationalization of Italian companies, 21 October 2021
- Panelist, “Tax Aspects in Private Equity Transactions” at the Tax & Legal Marathon, Italian Association of Private Equity, Venture Capital and Private Debt (AIFI), 24 May 2021
- Speaker, "How to finance a scale-up in Italy," Endeavor Digital Event organized by Endeavor Italia, 1 December 2020

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*

- 24 September 2026, Investing in Italian Real Estate Assets through Regulated Investment Vehicles – An Overview of Income Tax Implications for Foreign Investors, *IBFD*
- 1 April 2020, COVID-19: COVID-19 and the Cura Italia Decree
- 1 April 2020, COVID-19: Dividend Distribution Policies During the Covid-19 Pandemic
- 2019, Brexit: Deal or No Deal? Regulatory and Tax Implications for the Banking and Financial Services Industry
- 15 November 2018, Italian Financial Transaction Tax Implications of the Evolving Regulatory Landscape: The Post-MiFID II Financial Market Ecosystem
- 4 July 2018, Brexit: Italian Financial Transaction Tax Implications: The Market Making Exemption
- 8 August 2017, Update: Italian Parliament approves the new National Merger Filing Thresholds
- 7 April 2017, Prepared for the Border Adjustment Tax? A U.S. and Global Perspective
- 29 March 2017, The Italian Council of State Provides Welcome Clarifications Regarding the Standard of Proof That the Italian Competition Authority Must Discharge
- 22 February 2017, OECD: Italy Should Approve its Proposed Competition Legislation 'Swiftly', Including the Reform of the National Merger Filing Thresholds
- 23 January 2017, Italy Implements EU Directive on Damages for Breaches of Competition Law
- 16 November 2016, Italy to Implement EU Directive on Damages for Breaches of Competition Law
- 27 August 2015, Italian Tax Reform

OTHER PUBLICATIONS

- "Transaction Costs and VAT Deductibility in Management Leveraged Buyouts (MLBO)," Wall Street Italia, May 2026
- "Tax incentive for qualifying investments by social security institutions and pension funds – fund-of-funds structures," Italian Association of Private Equity, Venture Capital and Private Debt (AIFI), March 2026

- "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

- 1 October 2026, K&L Gates Advises on Acquisition and Financing of Mantova Sud Logistics Development Site
- 25 March 2026, K&L Gates Recognised in 2026 Edition of *The Legal 500 EMEA*
- 19 March 2026, K&L Gates Ranked in Chambers Guides Across European Regions
- 15 July 2025, K&L Gates Assists PGIM Establish US$200 Million Private Shelf Facility and Issue €50 Million Green Bond
- 24 June 2025, K&L Gates Advises Continental on the Sale of Italian Drum Brake Plant to Mutares
- 5 May 2025, K&L Gates Advises LEEU Collection on Redevelopment of Collegio alla Querce in Florence
- 26 March 2025, K&L Gates Recognised in 2025 Edition of *The Legal 500 EMEA*
- 24 March 2025, K&L Gates Advises Zetland Capital Partners in Acquisition of Minority Stake of The Grand Hotel Imperiale Resort & Spa in Como
- 20 March 2025, K&L Gates Ranked in Chambers Guides Across European Regions
- 19 March 2025, K&L Gates Advises Crea.re Group in Acquisition of the Galleria Subalpina in Turin
- 10 March 2025, K&L Gates Advises Invel on €111.2 Million Bond Issue to Finance Redevelopment of Hotel Majestic in Rome
- 27 March 2024, K&L Gates Recognised in 2024 Edition of *The Legal 500 EMEA*
- 14 March 2024, K&L Gates Ranked in 2024 *Chambers Europe* Guide

- 22 June 2023, Nearly 50 K&L Gates Lawyers Throughout Europe Recognized in 2024 Best Lawyers, Ones to Watch Editions
- 7 June 2023, K&L Gates Advises Vitesco Technologies on Sale of All Shares in Vitesco Technologies Italy Srl
- 12 April 2023, K&L Gates Recognised in *The Legal 500 EMEA* 2023 Edition
- 20 March 2023, K&L Gates Advises ARRI Group on Acquisition of Professional Lighting Provider Claypaky
- 16 March 2023, K&L Gates Recognized in 2023 *Chambers Europe* Guide
- 17 March 2022, K&L Gates Recognized in 2022 Chambers Europe Guide
- 27 January 2022, K&L Gates Advises D-Orbit on Combination With Breeze Holdings Acquisition Corp.
- 25 March 2021, K&L Gates Recognized in 2021 Chambers Europe Guide
- 26 May 2016, K&L Gates, Lawyers Earn Honors in Chambers Global, Regional Guides
- 17 February 2016, K&L Gates Names 50 New Partners
- 6 May 2015, K&L Gates, Lawyers Recognized as Leaders in Chambers Global Guides

AREAS OF FOCUS

- Tax

INDUSTRIES

- Financial Services
- Investment Transactions
- Private Equity

REPRESENTATIVE EXPERIENCE

- Assisted LEEU Collection, led by Indian tycoon Analjit Singh, as controlling shareholder of Collegio alla Querce in Florence, in the completion of the development of a five-star luxury hotel in Florence, including negotiation with investors and lenders.
- Assisted the leader of a consortium of entrepreneurs in the acquisition of a historical asset in Turin from a fund managed by an asset management company and underwritten by an alternative asset manager.
- Assisted an independent real estate investment and asset manager in financing a €111.2 million bond issue for the development and redevelopment of the former Hotel Majestic in Rome. The 87-room property will be managed by Starwood Hotels and repositioned as the five-star Baccarat Hotel Rome.

- Advised a private equity firm on the merger and acquisition, corporate governance, tax, structure, and financing aspects of the Grand Hotel Imperiale Resort & Spa in Como, Italy. The hotel has been acquired by a number of investors with the aim of reopening in 2027 after a full refurbishment.
- Assisted a German captive investment and asset manager for real estate in relation to the acquisition of a logistic park near Milan, Italy.
- 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 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 the Italian financial transaction tax regime applicable to transactions in Italian equities executed by the client.
- Assisted an Italian recycling and waste-handling company on the tax aspects of structuring its foreign activities and 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 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.