

# Tax

Practice area

In no other legal field is the difference for a client between being right and prevailing as great as in tax law. With the Danish state as the opposing party, it requires deep experience, an uncompromising focus on quality, and close collaboration with the client and its day-to-day tax advisors to counterbalance the state's inexhaustible resources.

#### SUB AREAS

The beneficial owner cases
Duties in the financial sector
EU tax litigation
Transfer Pricing

Plesner is the market leader in handling Danish tax cases. From the first negotiations with the tax authorities through the National Tax Tribunal to the courts and the Court of Justice of the European Union, we dedicate ourselves to conducting complex cases involving fundamental questions.

No other Danish law firm has prevailed in as many significant tax cases as Plesner. In 2024, for the 13th time since 2009, the International Tax Review named Plesner "Denmark Tax Firm of the Year".

Collaboration is at the heart of our way of working.

We assemble a team to handle each case and pool the necessary resources and experience. We prioritise active partner involvement at every stage of the process, and we work closely with clients and their day-to-day tax advisors.

Our ambition is to deliver uncompromising quality in every case we undertake. We perceive tax litigation as a creative process that necessitates innovative thinking. Similar issues in other parts of the legal system often provide the solution, making extensive knowledge of other legal areas essential. We focus on the details while keeping a broad perspective.

Advisory services are a matter of trust. We speak our minds. We take nothing for granted, testing all relevant premises and challenging conventional thinking.

Conducting and winning a tax case necessitates significant litigation experience. Plesner has the largest and most comprehensive team of highly specialised tax litigators. Our collective experience and track record provide the best basis for not just being right but also prevailing.

Case News 01.04.2025

RWE sells 49% of the largest offshore wind farm in Denmark - Thor Wind Farm

Case News 12.07.2024

The Eastern High Court rules in favour of EET Group A/S in extensive transfer pricing case

Case News 18.06.2024

Sampo plc announces a public exchange offer to the shareholders of Topdanmark  $\ensuremath{\mathsf{A/S}}$ 

Case News 13.10.2023

The National Tax Tribunal reverses the case law of the Danish Tax Agency on additional taxation of foundations' tied-up funds on dissolution

Case News 30.06.2023

The Supreme Court finds in favour of the Ministry of Taxation in another "beneficial owner" case

Case News 04.05.2023

Danish Supreme Court rules against tax payers in two "beneficial owner" cases regarding interest

Case News 24.02.2023

Vækstfonden raises DKK 2.4 billion in Dansk Vækstkapital III

Case News 09.01.2023

The Danish Supreme Court has given its judgment in the first two Danish "beneficial owner" cases

Case News 20.09.2022

Danish insurance company Codan Forsikring successful in transfer pricing case before the Danish Eastern High Court

Case News 31.03.2022

The Eastern High Court reduces the Ministry of Taxation's interest claim significantly in beneficial owner case

Case News 04.03.2022

First Danish transfer pricing dispute decided in arbitration under the EU Arbitration Convention



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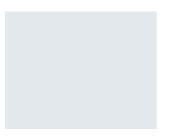
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# Ratings



2025 The Legal 500

Within Tax, Plesner is a first tier firm.

"The tax team is the top pick in Denmark. They know the area and work with all the leading companies. Hereby they gain a unique understanding of tax issues"

"Very strong team especially within the area of disputes"

"Great insight and always up to date"

"Best in class within tax litigation"

"The team successfully familiarised themselves with a completely new area and the intricacies of the same. They not only got a very good grasp of how it worked but managed to tie it all together with the functionality and administration of reinsurance. I am confident that they will be able to do the same in other areas as well"

"Dedication, craving for knowledge and understanding of the area in question. Experts within the area of transfer pricing. Excellent in court, where they managed to draw the attention to the important matters. All in all a stellar performance both in the preparation and the execution"



Chambers Europe

Plesner is listed in "Band 1" as regards Tax.

"Plesner is well-versed and extremely experienced in highly technical areas of law. It is able to make difficult concepts and strategic decisions digestible for non-experts"

"Plesner has significant experience and is very strong on the subject matter"

"Plesner delivers a very high standard and is best-in-class in Denmark"



The Legal 500

Within Tax, Plesner is a first tier firm.

"Their industry and practice knowledge is very strong"

"They have a detailed knowledge of tax and, combined with an incredible business understanding, they are able to turn a complex matter into a simple line of arguments to make a convincing story"

"Very experienced and competent within tax litigation and transfer pricing. Strong mindset around people"

"Responsive, convey technical legal matters well in general business terms"















#### 2024 Chambers Europe

Plesner is listed in "Band 1" as regards Tax.

"The team is very experienced, knowledgeable and proactive in its approach"

"The lawyers are able to understand a problem holistically, and are very knowledgeable regarding practical case handling. They are always responsive and good at explaining complex matters to business teams"

#### 2024 World Tax

Plesner is ranked in Tier 1 in the World Tax ranking as the only Danish firm across the three tax categories (General Corporate Tax, Transfer Pricing and Tax Controversy).

#### 2023 The Legal 500

Within Tax, Plesner is a first tier firm.

"Best track record for tax litigation in Denmark. Highly skilled team"

"Strong analytic skills including the ability to mitigate complex matters"

"Great team work with different skill sets and very strong capabilities within transfer pricing and tax litigation"

#### 2023 Chambers Europe

Plesner is listed in "Band 1" as regards Tax.

"The team at Plesner is excellent - easily the best in tax in Denmark, and one of the best in tax in Europe. The lawyers provide wonderful client service, are responsive and give cutting-edge advice"

"The lawyers are knowledgeable within tax controversy and transfer pricing. They are also very proactive"

#### 2023 World Tax

Plesner is ranked in Tier 1 in the World Tax ranking as the only Danish firm across two tax categories (General Corporate Tax and Tax Controversy).

"Plesner is widely regarded as the leading Danish law firm for all areas of tax law, including tax litigation"