Joseph Hone

Skadden

European Counsel, London

Tax



T: 44.20.7519.7235

Education

Legal Practice Course, BPP University 2012 (with Distinction)

B.A., University of Oxford, 2011 (Honours)

Bar Admissions

England & Wales

Publications

"First-Mover Disadvantage? Challenges to Being Tax Resident in an Early Pillar Two Jurisdiction," Skadden Insights, September 2023

"Exploring Potential Investor-State Treaty Challenges to the OECD's Pillar Two Model Tax Rules," *Skadden, Arps, Slate, Meagher & Flom LLP,* March 2,

"Holding Regimes in a New Era," Loyens & Loeff, 2020-22

"UK: Corporate Tax Comparative Guide," *Mondag*, November 25, 2019 Joseph Hone represents clients on a broad range of U.K. and international tax matters, with particular emphasis on cross-border transactions. He has experience across the full spectrum of international corporate, capital markets and fund matters. Mr. Hone regularly advises on mergers and acquisitions, joint ventures, internal restructurings, debt and equity issuances, and the establishment of hedge fund and private equity fund structures.

Mr. Hone also handles tax controversy matters and has worked on enquiries by the U.K. revenue authorities, tax court cases, disclosure programmes, transfer pricing and settlement negotiations.

His recent transaction highlights include advising:

- Electronic Arts Inc. on the tax aspects of its US\$1.2 billion recommended cash offer for Codemasters Group Holdings plc
- Auchan Retail S.A. in its US\$3.6 billion sale of a 70.9% stake in A-RT Retail Holdings Limited, a company which owns 51% of Sun Art Retail Group Limited, to Taobao China Holding Limited, a wholly owned subsidiary of Alibaba Group Holding Limited
- Adevinta ASA in its US\$9.2 billion acquisition of eBay's classifieds business, creating the world's largest online classifieds company
- Pfizer Inc. on the tax aspects of its consumer health care joint venture with GlaxoSmith-Kline that created the world's largest maker of over-the-counter products
- Citi in its platform fund formation and manager relationships
- Perella Weinberg Partners in connection with its U.K. reorganisation and international structuring
- The Coca-Cola Company in several acquisitions and advisory matters
- Air Products & Chemicals Inc. in the tax-free spin-off of its materials technologies business into a separate, publicly owned company called Versum Materials, Inc.
- Toto Wolff, an Austrian investor, in his acquisition of a significant minority stake in, and appointment as executive director of, Mercedes-Benz Grand Prix Ltd, the company operating the Mercedes Formula 1 team
- The Middleby Corporation in several non-U.S. acquisitions
- HSBC Securities (USA) Inc. as lead underwriter in multiple debt offerings by HSBC Holdings plc
- BTG Pactual Group S.A. in the US\$1.6 billion spin-off of its commodity trading unit

Mr. Hone has been repeatedly selected for inclusion in *Chambers UK*, in which clients have said "he is always available and very knowledgeable." and recognised as a key lawyer in *The Legal 500 UK*. He is part of the Skadden Tax Group ranked in Band 1 in *Chambers Global* for Global Tax and the London tax team that has been repeatedly honored as Best International Tax Team of the Year at the Tolley's Taxation Awards, including in 2023.

Outside of his core practice, Mr. Hone regularly represents local Tower Hamlets residents on a *pro bono* basis in the First-Tier Tribunal (Social Entitlement Chamber) in appeals against decisions of the secretary of state for work and pensions concerning awards of government welfare and disability benefits.