

## Rupert Shiers

Partner

London

### Biography

For fifteen years, Rupert has navigated complex HMRC discussions and tax litigation for corporates, individuals and pension funds, and is the Leader of our Tax Disputes team in the UK and Europe.

Beyond navigation, Rupert provides technical knowledge in areas many group tax functions have not needed to develop themselves: taxpayer rights and HMRC powers, tax statutory interpretation, tax public law, tax-related evidence and procedure. His commercial approach has made him a valuable extension to in-house tax teams on a wide-range of projects.

He is one of a small handful of UK advisers with experience of challenging tax which discriminates against cross-border structures (a breach of EU law). He also helps eliminate tax charges on unintended events or where the documents do not tell the full story, advising taxpayers and persuading HMRC. As well as astute advice on disputes in tax, Rupert deals with tax in disputes, helping commercial claimants and defendants understand and minimize the impact of tax on their litigation.

Rupert has worked full-time in HMRC disputes since before it became a real discipline, and has been recognized for many years as a leader in his field. He



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### Languages

English

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### Practices

Administrative and Public Law

Insurance

Investigations, White Collar Crime,  
and Fraud

Litigation

Tax

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### Industries

Automotive and Mobility

Consumer

worked for many years with ex-HMRC officers and chartered tax advisers in a Big 4 environment before returning to practice in an international law firm.

## Representative experience

FTSE-100 company. Advising and acting in Tribunal proceedings and achieving settlement in relation to tax-structured hedging arrangements, including the application of unallowable purpose rules.

US tech giant: advising on HMRC's cross-border application of 'merchant acquirer' bulk data power

## Awards and rankings

- Acritas Star, *Acritas Stars Independently Rated Lawyers*, 2018-2019
- Chambers Partner Contentious Tax 2015 Band One, *Chambers & Partners*, 2015
- Chambers Partners Contentious Tax 2014 Band One, *Chambers & Partners*, 2014
- Chambers Partners Contentious Tax 2013 Band One, *Chambers & Partners*, 2013
- Chambers Partners Contentious Tax 2012 Band One, *Chambers & Partners*, 2012
- Chambers Partners Contentious Tax 2011 Band One, *Chambers & Partners*, 2011
- Chambers Partners Contentious Tax 2010 Band One, *Chambers & Partners*, 2010
- Chambers Partners Contentious Tax 2009 Band One, *Chambers & Partners*, 2009

## Latest thinking and events

- Hogan Lovells Publications
  - TMT Horizons 2019
- Blog Post
  - Is it time for a review of your transfer pricing arrangements? The potential impact of the HMRC

Energy and Natural Resources

Financial Institutions

Insurance

Real Estate

TMT

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## Areas of focus

Tax Disputes and Controversy

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## Education and admissions

### Education

Bachelor of Civil Law (First),  
University of Oxford, 1996

MA, Law (First), University of  
Cambridge, 1994

CEDR, Accredited Mediator

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## Memberships

Chartered Institute of Taxation, EU &  
Human Rights sub-committee

Chartered Institute of Taxation,  
Management of Taxes  
sub-committee

Confédération Fiscale Européene,  
UK delegate

UK delegate Confederation Fiscale  
Europeene

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## Accolades

'Rupert Shiers is lauded for 'his

## Profit Diversion Compliance Facility

- Hogan Lovells Publications
  - HMRC introduces Profits Diversion Compliance Facility
- Hogan Lovells Publications
  - UK Tax Authority tightens the screws on tech companies
- Events
  - DPT / TP and dispute resolution breakfast seminar: Spring 2018
- Events
  - New corporate criminal offences - Are you prepared?

attention to detail, responsiveness and ability to propose commercial solutions' to his clients' problems. He is also praised for his concise communications and client service'

*Chambers 2016, Contentious Tax,  
Band 1*

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'The 'technically very sound' Rupert Shiers 'is a class act,' according to observers'

*Chambers 2015, Contentious Tax,  
Band 1*

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'is noted for his representation of clients in HMRC enquiries and investigations in addition to his recognised excellence as a tax litigator'

*Chambers 2014, Contentious Tax,  
Band 1*

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