



Karolina Stawowska

Partner

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Tax

Private Clients

Private Equity

Law done right.

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The big advantage is that Karolina Stawowska creates a very good atmosphere around the tax subject, ensuring a smooth deal. The personality of Karolina combines with a wide experience to make her a clear asset during a transaction. She really took the time to understand our sector and adapted her knowledge to it.

– The Legal 500

About

Karolina Stawowska heads the Tax team in Poland. She is a tax and business adviser with over 25 years of professional experience acting for corporate clients, private individuals, and private equity and venture capital funds. Karolina has worked on restructuring of capital groups, development of tax strategies for acquisitions and sales of companies, and investment financing. She also has extensive experience in tax proceedings and conducting tax litigation in administrative courts.

Prior to joining Wolf Theiss, Karolina cooperated with other prominent international law firms and a Big Four accounting and consulting firm in Warsaw. She graduated from the University of Łódź and is a member of the National Bar of Tax Advisors.

Wolf Theiss

Latest rankings

Tier #3 - Tax
Chambers & Partners Europe,
2023

Recommended individual - Tax
The Legal 500, 2023

Recent work highlights

- Successfully representing two private clients, owners of shares in a Polish company, in front of the Supreme Administrative Court, the second and last court instance, relating to the possibility of reclassification/recharacterisation of legal acts by tax authorities based on income tax provisions binding prior to 1 January 2019. The judgment was the first one specifically addressing the issue of reclassification and recharacterisation under transfer pricing provisions. Bearing in mind the number of similar cases in front of tax authorities and Administrative Courts, this judgment set a precedence for all of them.
- Advising Mitiska REIM, a leading European investor specialising in convenience real estate including retail parks, urban logistics, and light industrial multi-let projects, on tax aspects of the successful purchase of a distressed asset, Europa Centralna retail centre – one of the largest commercial buildings in Poland and Europe and the largest retail scheme in Gliwice.
- Advising Erwin Hymer Group, one of the largest manufacturers of motorhomes and caravans in Europe, on the tax aspects of the acquisition of a property and a factory building in Nowa Sól in the Kostrzyn Economic Zone in Poland, where it plans to manufacture caravans. Our advice included transaction documentation, drafting of the VAT Side Letter, drafting and negotiating the tax insurance policy and finally assisting in the process of reclaiming VAT by the client.
- Advising a multinational bank on tax aspects of the wind-down of operations in Poland, Slovakia and the Czech Republic, including structuring the transaction with as little tax leakage as possible and reviewing the application of double taxation treaties. The regulated nature of the businesses (e.g. credit card issuance) and the various ties (SLAs) between group entities accounted for the complexity of the project.
- Advising Fidia Farmaceutici on tax aspects of establishing its subsidiary in Poland and on the acquisition of the Polish business of Unipharm, a privately owned pharmaceutical company headquartered in the U.S. Our advice included drafting transactional documentation, especially tax representations and warranties, as well as negotiating transfer of particular business items so that the character of the deal was not jeopardised.
- Advising Burda Media Polska, the largest lifestyle media company in Poland, on tax aspects of acquisition of 100% of shares in Edipresse Polska from Edipresse Group, a Swiss media company, including reorganisaton of Edipresse Polska prior to takeover.
- Advising Polish and Luxembourg subsidiaries of an international waste management group on tax aspects of a complex financing project, which assumed obtaining financing from international institutions. Our advice included designing a financing structure to maintain certain financing parameters and at the same time to mitigate the impact of withholding tax over cash flow and the effectiveness of the financing stream, participating in structuring the cash flows as well as commenting on and giving input to setting securities for the purpose of this financing.

Law done right.

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