



Carlos Loaiza Keel

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Corporate and M&A Tax

Carlos Loaiza-Keel has over 20 years' professional experience in different countries in Taxation, M&A, Corporate Law, Compliance and Management, at both local and international levels.

Throughout his professional career, he has advised multinational groups with investments in Europe and Latin America, participated in some of the most important M&A and corporate restructuring deals taking place on the continent, and handled complex negotiations with the Tax Authorities.

Educated in the University of Navarra and Centro de Estudios Garrigues of Spain, the Austral University of Buenos Aires, the Panamerican University of México, Harvard Law School and Singularity University of the United States of America and the University of Montevideo of Uruguay in Management, Computer Science and Technology, Compliance, Taxation and Corporate Law.

Lecturer in International Taxation and Tax Governance at the University of Montevideo and Centro de Estudios Garrigues, and frequent participant in congresses, panels. His articles are often published in newspapers, and has written several specialized articles and books in his fields of expertise.

Experience

Started off his career in the Tax & Legal Services department of PwC in Montevideo in 2002, and in 2007 he joined the Transfer Pricing and International Taxation team at Garrigues' Madrid office.

In 2009, he joined Barros & Errázuriz in Santiago de Chile as foreign associate and in 2014 he joined Proskauer Rose LLP in New York as a visiting partner.

In Uruguay, he joined Sanguinetti & Asociados as a partner in 2012, where he advised companies in Corporate Law and Taxation, participated in M&A and corporate restructuring deals, and led complex negotiations with the Tax Authorities.

In 2015 he rejoined Garrigues as a Local Partner to participate in its international expansion project in Latin America. He also develops coordination activities in the Taxation Group in Latin America and participates in

the development of technical contents.

Throughout his professional career, Carlos has advised multinational groups with investments in Europe and Latin America, and participated in some of the most important M&A deals taking place on the region, such as the US\$ 3.2 million purchase by the Colombian group SURA of assets of ING throughout Latin America, which was named "Deal of the Year 2011" by the British magazine Latin Lawyer; or the US\$ 400 million purchase by Arauco-Stora in 2009 of the ENCE Group assets in Uruguay, the largest transaction in Uruguay's history to date.

He speaks Spanish, English and Portuguese, and has basic knowledge of Italian and French.

Academic background

Doctorate in Law (Degree in Law) from Universidad de Montevideo, Uruguay, 2003 (summa cum laude, 1st place in student ranking).

Master's Degree in Taxation from Centro Europeo de Estudios Garrigues, Spain, 2007.

Executive Master's Degree in Business Law from Centro Europeo de Estudios Garrigues in collaboration with Harvard Law School, Spain, 2009.

Management Program for Leaders of the Americas by IESE Business School (Universidad de Navarra, Nueva York), IAE Business School (Universidad Austral, Buenos Aires) and IPADE Business School (Universidad Panamericana, México), 2016.

Postgraduate Program in Compliance for Latin America, Thomson Reuters, 2018.

Program in Exponential Leadership, Singularity University, 2019.

Computer Science for Lawyers, Harvard Law School, Executive Education, 2022.

Teaching activity

Carlos lectures in International Taxation and Tax Governance at the University of Montevideo, and participates regularly in congresses, panels, and press articles in his areas of expertise.

Memberships

Member of the International Bar Association (IBA), the International Fiscal Association (IFA) and the International Academy of Comparative Law (AIDC-IACL).

Promoter-founder of the Executives' Global Network "Conexión España".

Member of the Academia Nacional de Economía del Uruguay (ACADECO, National Academy of Economy, Uruguay).

He was also a member of the Visual Arts Workshop at the Torres García museum.

Distinctions

He has been honored as one of the leading lawyers in his practice area by Chambers Latin America and Latin Lawyer, as well as been appointed collaborator for Latin America by Fundación Euroamérica.

National Reporter of the International Bar Association's Tax Committee (IBA) in 2017 and 2018, and of the International Fiscal Association (IFA) in 2009.

In 2006 he was awarded scholarships by the Fundación Carolina del Reino de España, the European Union's Fundación Euroamérica and Colegio Mayor Moncloa in Madrid.

Publications

- El Convenio para Evitar la Doble Imposición entre España y Uruguay: Frente a BEPS y la normativa fiscal internacional, Thomson Reuters, 2019.
- Inversiones españolas en Latinoamérica: la internacionalización de las empresas españolas y el resurgimiento de las multilatinas en el siglo XXI, con Antonio Bulnes y Ramón Casilda-Béjar, Thomson Reuters, 2018
- El Nuevo Convenio para Evitar la Doble Imposición entre España y Uruguay: un análisis de la fiscalidad internacional de las inversiones españolas en Latinoamérica, Thomson Reuters, 2011.
- Ser o no ser: Uruguay y su camino a la OCDE, Universidad de Montevideo, 2013.

Articles:

- “Fiscal Friend: New tax treaty between Spain and Uruguay”, Latin Lawyer, December 2009.
- “Willing to change: Is Latin America ready for tax reforms needed to sustain economic growth?”, Latin Lawyer, March 2009.
- “Latin America up and running: Transfer pricing documentation”, Latin Lawyer, June 2008.