

Associate, London

Tax



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Education

Legal Practice Course, BPP Law School, 2017

G.D.L., BPP Law School, 2016

B.A. (Hon), University of Oxford, 2015

Bar Admissions

England & Wales

Alex Rigby represents a broad range of clients in U.K. and international tax matters. Mr. Rigby advises clients on high-value tax controversy matters, including enquiries by the U.K. revenue authorities, transfer pricing disputes and competent authority work, such as advance pricing agreements and mutual agreement procedures. He also counsels on a range of transactional tax matters, including public and private mergers and acquisitions, joint ventures, equity and debt issuances, demergers and restructurings, often involving an international component.

In recognition of his work on contentious matters, Mr. Rigby was named a Rising Star in Tax Controversy in *ITR World Tax's* 2025 edition.

Representative matters include:

- a multinational biopharmaceutical group in matters relating to the High Risk Corporates Programme, which involved a long-running enquiry by HM Revenue & Customs (HMRC) into various transactions worth over a combined \$10 billion, as well as on related competent authority applications under the U.K.-U.S. double taxation convention
- a multinational technology business in HMRC enquiries into the onshoring of intangibles worth approximately \$9 billion
- a global diversified alternative asset management firm in competent authority applications resulting from HMRC enquiries
- a global technology company in HMRC investigations into the tax treatment of incentive arrangements
- a global pharmaceutical group in its tax controversy planning related to the integration of an acquired biotechnology business
- various global technology and pharmaceutical groups in relation to HMRC compliance checks into matters such as Digital Services Tax, U.K. permanent establishments, the Profit Diversion Compliance Facility and the Investment Manager Exemption
- a sovereign wealth fund in the tax and other private wealth aspects of setting up multiple offshore structures to operate as parallel investment vehicles
- Spirit Aerosystems in its acquisition by The Boeing Company at an enterprise value of \$8.3 billion
- Danaher Corp in the tax aspects of its successful \$5.7 billion acquisition of Abcam plc, a provider of research solutions to life science researchers
- Neuberger Berman Group LLC in the business combination, reported at \$12.5 billion, of Owl Rock Capital Group and the Dyal Capital Partners division of Neuberger Berman to form Blue Owl Capital
- BMS Group in its \$579 million acquisition of David Roberts & Partners
- ASDA Group Limited in its acquisition of 132 trading petrol filling sites from The Co-operative Group

Mr. Rigby contributes to a number of Skadden's *pro bono* projects and has advised various individuals on their appeals against benefit decisions by the Department for Work and Pensions.