

Sean Bannister

Partner

Head of Tax



Sean is Head of the Tax practice at Edwin Coe.

Sean acts for high-net and ultra-high-net worth individuals and families and those that advise them (financial service providers and corporate service provider/trustees).

Principally acting for clients with assets and business interests globally, Sean is well versed on multi-jurisdictional issues and has a wealth of experience advising those who are seeking to ensure their tax affairs are administered in a framework that is both effective and compliant. A particular strength is advising non-domiciled clients as to how best to navigate the UK tax landscape and maximise their position, as well as assisting non-UK residents who are looking to acquire business or property interests in the UK and structure their arrangements effectively. Sean has also advised a number of non-UK trustees/directors as to their UK tax position and the impact of several significant legislative changes in the most recent years.

Sean has assisted a significant number of clients (both individuals and companies) who have had Serious Fraud enquiries and/or have sought to make disclosures to HMRC under one of the available disclosure facilities. In addition, Sean is presently undertaking a significant number of client assignments concerned with the significant recent changes to the overseas trust regime.

By combining his practical experience in relation to disputes work and the knowledge base developed as a result of his advisory work, Sean is able to provide an unparalleled service to his clients. With the ability to communicate complex concepts, Sean ensures his clients are well informed and are able to make the right decisions for their affairs.

Sean is also the firm's Head of [Corporate Social Responsibility](#).

Experience

Some examples of recent work include:

- Advising on a non-UK life assurance policy to hold overseas fund interests with a value in excess of \$100 million
- Advising on the re-structuring of a non-UK trust structure holding a significant Central London UK residential property portfolio
- Advising on the UK exit to Monaco of a non-domiciled individual in advance of the 'deemed domiciled' changes in April 2017
- Advised on the establishment of a non-UK trust structure in advance of the individual becoming 'deemed domiciled' under the pre April 2017 regime
- Advised on a 'mixed fund' cleanse exercise for a wealthy non-domiciled individual looking to repatriate funds to the UK
- Advised on the use of Business Investment Relief for a finance service professional looking to inject capital in to a new UK venture
- Advised on the re-structuring and sale of a UK business for the principals with a view to

- maximising Entrepreneurs Relief and their non-domiciled status
- Advised on the new 'relevant loan' regime as it relates to non-UK collateral for an individual acquiring a residential property in Central London.

Expertise

- [Tax: Overview](#)
- [Tax advisory services](#)
- [Taxation of Non Domiciled individuals](#)
- [Taxation of Non Resident Private Wealth & Corporate Vehicles](#)
- [Property Holding Structures](#)
- [Tax Investigations and Voluntary Disclosures to HMRC](#)
- [Tax compliance services](#)

Credentials

- [Named as one of eprivateclient's 50 Most Influential \(2024\)](#)
- [Named in the Citywealth Global Top 100 Tax Professionals List 2023](#)
- Named in the Citywealth Leaders List 2024
- Recommended in Spear's 500 for Tax Advice since 2021
- [Ranked as a Top 35 Under 35 \(eprivateclient 2016\)](#)
- [Ranked as a Top 35 Under 35 \(eprivateclient 2015\)](#)
- Winner of Wealth & Finance INTL – Best for Tax Dispute Resolution – UK
- Chartered Tax Advisor
- Edwin Coe's Head of Corporate Social Responsibility

Contact

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