



JOSEPH MERHAI

PARTNER

Attorney-at-law admitted to the Geneva Bar
Specialized in Tax, M&A, Funds, Financial Services

Head of the tax department

Languages: French, English

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FIELDS OF ACTIVITY

Swiss & International taxation, Finance, Investment Funds,
Corporate and M&A, Art Law

EXPERTISE

Joseph Merhai is specialized in corporate tax law, international tax planning, mergers and acquisitions (M&A), as well as in strategy and transfer pricing. He represents individuals and companies in tax law and tax criminal law matters.

He has extensive experience in banking tax law, as well as in the taxation of investment structures (collective investment schemes and wealth structures) and commodity trading companies. Additionally, he serves on the Board of Directors of several companies.

EDUCATION

2022 **IMD**, High Performance Boards Program

2019 **IMD**, Advanced High Performance Leadership Program

2014 **Saïd Business School, University of Oxford**, DFS

2012 **IMD**, High Performance Leadership Program

2006 **Swiss Tax Academy**, Federal Diploma as a Tax Expert

2002 **Admitted to the Geneva Bar**

1998 **University of Geneva**, Faculty of Law, Diploma of Advanced Studies in Tax Law: The Taxation of Derivative Products according to the LIFD)

EXPERIENCE

Since 2024 **Aegis Partners LLC** Partner

2014-2024 **BianchiSchwald Attorneys (formerly BCCC)** Partner specialized in Tax Law, Corporate Tax, M&A, and Financial Services

BOARDS

ALPSTONE CAPITAL (SUISSE) SA: Non-executive Director of the committee, (since Dec. 2024)

THE FONDATION ZDENEK ET MICHAELA BAKALA (2022 Q4 and 2023)

ONESCOPE SA (To be implemented)

HIGHLAND EUROPE (GENEVA) Sàrl: Member of the board (2017-Feb. 2025)

TO THE POINT (a non-profit organization) (since 2017)

EURONOVA ENERGIES LTD: Member of the board (2016-2018)

MEMBERSHIPS

Swiss Bar Association (FSA), Geneva Bar Association (ODAGE), Geneva Business Law Association (AGDA), Western Switzerland Association of Certified Tax Experts, International Fiscal Association (IFA), Oxford Business Alumni (OBA), IMD Alumni, HADAR.

RANKINGS

Best Lawyers in Switzerland 2026: ranked in Tax Law

Best Lawyers in Switzerland: Recognized since 2019 in Tax Law

Chambers Global Guide 2017, 2018, 2024, 2025 and 2026: ranked in Tax, Switzerland

Chambers Europe Guide 2017, 2018, 2024, 2025 and 2026: ranked in Tax, Switzerland

PUBLICATIONS

L'Art et la valeur, article summarizing « L'Art et la valeur, Volume 2 », SteuerRevue 9/2025, (p 627-641)

L'Art et la valeur, Volume 2
(Art and value), Schulthess, 2025

La clause de la nation la plus favorisée dans la CDI Suisse-Inde, conséquences d'interprétations

Co-author with Laurent Schenker, April 2024

Investment funds 2024

Co-author with Thomas Pasquier, Chambers Global Practice Guide (p. 421-427), March 2024

TVA et e-commerce

Co-author with Thomas Pasquier, Revue Douanière + TVA, 2023

L'Art et la valeur

Co-author with Thomas Pasquier, Schulthess, 2022

Analyse de l'arrêt 2C_546/2021 du 31 octobre 2022 du Tribunal

Co-author with Thomas Pasquier, Publication BianchiSchwald, 2022

Les instruments financiers : Aspects juridiques et fiscaux / Financial instruments : legal and tax aspects

Co-author with Nicolas Béguin et Alexandre Richa, Bâle (Helbing & Lichtenhahn), 2021

Droit de la propriété intellectuelle et droit fiscal: enjeux actuels d'une collaboration ou d'une confrontation autour de la licence box

Co-author with Laurent Muhlstein, in Steuer Revue – Revue fiscale, Cosmos Verlag, Bern, 2020

Aspects fiscaux en rapport avec le Coronavirus - update 17 avril 2020

Co-author with Sébastien Maury, Newsletter BianchiSchwald, 2020

Conventions de double imposition, accords fiscaux et secret bancaire

Co-author with Christophe Léchaux, in Les enjeux juridiques du secret bancaire, Actes du colloque 2011 de l'Institut de lutte contre la criminalité économique (éd. ILCE), Neuchâtel, 2011

Le processus d'évaluation en droit commercial et en droit fiscal – de la diversité vers la cohérence

Gesellschafts- und Kapitalmarktrecht (GesKR) N° 3, p. 330 et ss., 2010

Recent Indian Tax Case Law: A Swiss Perspective

L'Expert-comptable Suisse, N° 3, p. 529 et ss., 2010

Taxation of Derivatives and other Complex Financial Products

Co-author with Lionel Aeschlimann, in Conlon, International Tax Series – Suisse, 2007

Lump Sum Taxation, Swiss Federal Tax Authorities Provide Clarification

Co-author with Bernhard Zwahlen, Bulletin for International Fiscal Documentation (IBFD), p. 289 et ss., 2003

CONFERENCES

Objets d'art et impôt sur la fortune

With Patrick Waldburger, International Fiscal Association, Zurich, June 2025

How to attract and retain young talents when you are a penniless start-up?

With Manuel Bianchi Della Porta, Thomas Goossens and Marc Maret, Conférence Lift15, Geneva, February 2015

Echange automatique d'information : un nouveau paradigme du 1er décembre 2014

SOFGEN, Geneva, November 2014

Conventions de double imposition, accords fiscaux et secret bancaire, in Les enjeux juridiques du secret bancaire

Proceedings of the 2011 Symposium of the Institute for Combating Economic Crime (éd. ILCE), Neuchâtel, 2011

How to optimize the taxation of direct investment in India in the light of the recent Indian case law? A Swiss perspective

Seminar Academy and Finance, 22 November 2010

Double taxation treaties, tax treaties and banking secrecy

Colloquium of the l'Institut de lutte contre la criminalité économique, 21 October 2010

SELECTED DEALS

Funds

- Advising Index Ventures on Swiss legal and tax aspects of fundraise for their venture and origin funds (**Index Ventures XIII** - USD 900 mios and **Index Origin III** – USD 400 mios), 2026
- Advising Highland Europe on Swiss legal and tax aspects legal aspects of their fundraise for their venture fund **Highland Europe Technology Growth VI**, 2026
- Advising Medicxi Ventures on Swiss legal and tax aspects legal aspects of their fundraise for **Medicxi VI** (EUR 500 million), 2025
- Advising **Index Ventures** on the Swiss tax aspects on the transaction between Meta Inc and Scale.AI, a company where Index Ventures was an early investor, 2025
- Advising TOP Venture on Swiss legal and tax aspects legal aspects of their fundraise for **TOP Direct V** and **TOP VC III**, 2025

- Advising Index Ventures on Swiss legal and tax aspects of fundraise for their venture and growth funds (Index Growth VII - USD 1.5 billion and **Index Ventures XII** - USD 800 mios), 2024
- Advising **Highland Europe** on Swiss legal and tax aspects the fundraise and structuring of their Fund V (EUR 1 billion), 2023
- Advising **Medicxi Ventures** on Swiss legal and tax aspects legal aspects of their fundraise for Medicxi IV (USD 400 million), 2023
- Advising **Alpstone Capital (Switzerland) SA**, the Swiss entity of Alpstone Capital group, a macro trading hedge fund, cross-border tax and Swiss legal matters, 2023
- Advising **Index Ventures** on all legal aspects of their second Origin fundraise for Index Origin II (USD 300 million), 2022
- Advising **Index Ventures** on Swiss legal and tax aspects of their fundraise for Index Growth VI (USD 2 billion) and Index Ventures XI (USD 900 million), 2021
- Advising **Index Ventures** on Swiss legal and tax aspects of their first "Origin" fundraise for Index Origin I (USD 200 million), 2021
- Advising **Highland Europe** on Swiss legal and tax aspects of their fundraise for Highland Europe IV (USD 700 million), 2021
- Advising **Medicxi Ventures** on Swiss legal and tax aspects of their fundraise for their first secondary vehicle Medicxi Secondary I (USD 200 million), 2020
- Advising **Index Ventures** on Swiss legal and tax aspects of their fundraise for Index Growth V (USD 1.2 billion) and Index Ventures X (USD 800 million), 2020
- Advising **Medicxi Ventures** on Swiss legal and tax aspects their fundraise for Medicxi III (USD 400 million), 2019
- Advising **Highland Europe** on all legal aspects of their fundraise for Highland Europe III (USD 463 million).

Transactions and litigation

- Advising US venture capital fund **Spark Capital** on their investment in grape insurance AG a Swiss fully digital insurance, 2024
- Advising a **single-family office** and its UBO on philanthropy management, aircraft ownership and operations, and Swiss residence considerations, 2024
- Advising a **Swiss museum** on the expected donation of dozens of paintings from a French art collector, covering import duties, VAT, and inheritance aspects, 2024
- Acting as lead Swiss counsel in a **cross-border VAT fraud investigation** (EUR 300 million) linked to alleged VAT fraud in Germany, UK and USA, including defence, appeals, and coordination with foreign criminal proceedings, 2024
- Advising group **Casino** on the tax aspects of supply chain and distribution agreement, 2023
- Advising **Mubadala** on Swiss and international tax aspects of investments, financing, and development projects, including in the Swiss company wefox, 2023
- Representing a **Swiss wealth manager** in an on-going alleged tax fraud litigation in Germany and the UK. (2022)
- Advising **Medicxi Ventures** on its spin-out from Index Ventures, on multiple funds launches and on the IPO of **Centessa SA** on Nasdaq, 2021

- Working with a Swiss bank on tax and regulatory aspects of investments in a fintech company, including tailored tax structuring, 2021
- Advising **multiple HNWIs and UHNWIs** on Swiss and international tax aspects of their relocation from the UK to Switzerland, including restructuring of a family trust and real estate holding structure, 2020