



# Francesca Sipala

## MANAGING ASSOCIATE

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LANGUAGES Italian, English, French and Spanish  
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○ Tax

Francesca Sipala gained an extensive experience in the taxation of investment funds, as well as in dealing with the specific tax issues of fund managers, including the structuring of their carried interest rights. She regularly advises and assists fund managers in the context of their fundraising activities, particularly with the classification of the investors for Italian tax purposes, and in the context of day-to-day management, with the computation and classification for tax purposes of the income distributed by investment funds and with the due diligence and reporting activities required by FATCA and CRS rules. Francesca is actively involved in the advisory related to the implementation of incentive plans dedicated to fund managers/executives/other employees and in the personal planning of these individuals, including in relation to their relocation to Italy and the possible election for certain favorable tax regimes, such as the "impatriates regime" and the "neo-domiciled regime" (also called "flat tax regime"). She developed also experience in assisting Italian and foreign clients from the financial sector in tax audits and litigation cases, including in relation to the application of double tax treaties, and in administrative relationships with the Italian tax authorities (ruling requests, refund procedures, etc.).

### *Professional Experience*

#### **MANAGING ASSOCIATE | FROM 2025**

Legance – Avvocati Associati, Rome, Italy

#### **SENIOR ASSOCIATE | 2021 – 2025**

Legance – Avvocati Associati, Rome, Italy

#### **ASSOCIATE | 2015 – 2021**

Legance – Avvocati Associati, Rome, Italy

#### **INTERNATIONAL TAX CONSULTANT | 2014 – 2015**

Ernst & Young, Rome, Italy

### *Education*

#### **2023**

Academy of American and International Law, International and Comparative Law, Centre of the South-western Legal Foundation, Dallas, Texas, U.S.A.

#### **2019**

Master Degree in Tax Law – Il Sole 24 Ore, Business school, Rome, Italy

**2017**

Admitted to the Bar. Member of the Rome Bar, Italy

**2014**

Law Degree, *maxima cum laude*, Università "LUISS - Guido Carli", Rome, Italy

**2014**

Participation in the "Eucotax Wintercourse 2014" on issues of international taxation, Sorbonne Université, Paris, France