Tax

Global experience in designing and implementing reorganizations that achieve your business objectives and effective tax planning

The changing tax environment

The rapidly changing international tax environment means that it is more important than ever for multinational businesses to consider not only the impact of their corporate structure on their effective tax rates, but also to take into account reputational issues and the potential consequences of increasingly complex legislation. Given these factors, it is critical to take a global view.

Whether you are looking to expand your global footprint, restructure your supply chains, refinance your group, consolidate or simplify your business post-merger or acquisition, improve your group's tax efficiency or simply review the tax position of your existing structure, our team of more than 300 tax advisors across the world can see the global picture and help you to navigate this changing tax landscape.

How international tax considerations affect your business

Tax authorities around the world have become more assertive in collecting taxes. Many governments view the old system of tax treaties and transfer pricing rules as insufficiently robust to protect national tax bases in the modern world of highly mobile people and capital and increasingly technology-based global trade. These issues have led to a raft of supranational and national initiatives and legislative proposals, many of which will be of critical importance to any multinational business.

The measures proposed in the OECD's and G20's Base Erosion and Profit Shifting (BEPS) Project have been endorsed by more than 100 countries and are being implemented worldwide. In the EU, the Anti-Tax Avoidance Directives (ATAD and ATAD II) include various BEPS initiatives. These changes are all taking place against a backdrop of rapidly increasing information exchange between national tax authorities.

These developments could have profound effects on the structure of your group, for example by denying deductions or treaty withholding rates for cross-border money flows, or targeting misalignments between location of profits and the activity or assets generating those profits. Greater levels of information exchange could also expose unprepared multinationals to a range of questions from tax authorities, litigation risks and, potentially, higher tax liabilities.

KEY CONTACTS

Michael W. Hardgrove
Partner
Boston
T: +1 617 406 6039
michael.hardgrove@dlapiper.

Alison Maxwell
Partner
Seattle
T: +1 206 839 4878
alison.maxwell@dlapiper.com

Sibel Owji
Partner
San Francisco
T: +1 415 836 2563
sibel.owji@dlapiper.com

Philip Rogers
Partner
New York
T: +1 212 335 4903
philip.rogers@dlapiper.com

Ben Brown
Partner
London
T: +44 (0)20 7796 6204
ben.brown@dlapiper.com

RELATED SERVICES

- International Corporate Reorganizations