



## 国际税务顾问

Companies operating in global markets have many complex legal, tax and operational issues that require an international perspective combined with a thorough knowledge of country-specific tax, legal and regulatory practices. As a leading international legal services provider, we solve these tax, legal and business challenges through a combination of local tax and legal capability, global tax and legal project management, and full-service support across borders in a multi-disciplinary manner.

With more than 380 tax lawyers and economists in offices throughout Europe, Asia and the Americas, DLA Piper's global tax advisory services help tax departments of multinational companies address the complex challenges of international commerce and business operations. Our global tax group also assists clients in structuring a wide range of transactions, from private equity deals to corporate acquisitions and disposals as well as assisting with tax audits and related compliance issues. We provide these tax services across our global platform, while at the same time offering clients the benefits of the lawyer-client and work-product privileges.

Our tax lawyers draw upon the experience of colleagues in numerous areas of law, including intellectual property and technology, corporate and finance, real estate, employment and employee benefits. In addition, DLA Piper's practices in such areas as regulatory and EU competition, public affairs and government affairs further strengthen the capabilities of our tax practitioners, resulting in fully integrated advice to our clients.

### CAPABILITES

We help the tax departments of multinational companies reduce their global effective tax rate.

We work closely with our clients to understand their businesses, knowing that a thorough understanding of an organization and its business objectives is necessary for developing the appropriate tax arrangements.

- **Transfer Pricing** - Our transfer pricing lawyers and economists assist clients with the development, implementation, documentation and defense of beneficial worldwide transfer pricing strategies. In conjunction with our in-house economists, we prepare transfer pricing reports that identify and document appropriate pricing pursuant to applicable tax laws for a wide range of intercompany transactions, including manufacturing, distribution, licensing, cost sharing and financing.
- **Post-Acquisition Integration** - After an acquisition, there is often duplication of entities in a jurisdiction or inherited finance structures that need to be reorganized. DLA Piper provides coordinated advice and implementation that ensures the most effective group structures are in place. Typically, this will involve movements of companies within the group, transfers of trade between companies to maximize commercial efficiency, return of capital and liquidation of surplus companies, maximizing tax efficiency of debt funding and

#### 主要联系人

**Jacques Wantz**

合伙人

Luxembourg

电话: +352 26 29 04

2635

[jacques.wantz@dlapiper.com](mailto:jacques.wantz@dlapiper.com)

effective utilization of operating losses.

- **Cross-Border Licensing and Intellectual Property Management** - A company's intellectual property, such as patents and computer software, is a valuable asset, and the global ownership, licensing, exploitation and development of such property has significant tax consequences. Traditional rules of international taxation based on territorial concepts have become increasingly difficult to apply in this context. Our international tax professionals are on the cutting edge of transactions in this arena, regularly helping clients address the multitude of tax issues relating to intellectual property assets.
- **Tax Controversy** - Our lawyers represent clients in disputes and refund claims concerning international transactions, transfer pricing and related tax issues, often obtaining large refunds or assessment reductions. When defending clients in tax audits, we also focus aggressively on refund opportunities, striving to obtain optimal results in contested matters. Our experience includes devising tax strategies to minimize government assessments, managing tax audits, fact finding, communicating with the government and, where necessary, litigation.
- **VAT and Customs Duties** - The increasing globalization of business, combined with new technologies and ways of doing business, can give rise to unexpected sales tax liabilities (eg VAT in Europe and GST in Australia). Our VAT team advises clients on the incidence of VAT, planning techniques for minimizing irrecoverable input VAT, registration and compliance, negotiating successful settlements and appealing assessments, and customs duties.
- **Supply Chain and Distribution Network Restructuring** - We have extensive experience in assisting multinational companies in supply chain management and distribution arrangements. For example, our Asia offices regularly assist multinational companies structure complex supply chain arrangements throughout the region. We also regularly assist many European and US luxury brands, software companies and medical equipment suppliers in structuring their distribution and retail operations.
- **Equity Investment and Incentives Tax Services** - Our equity investments and incentives team has considerable experience advising on, designing and implementing all tax, corporate and commercial aspects of executive and employee incentive structures. In addition, we provide senior executives with access to equity value through innovative, tax-efficient share structures without requiring a substantial initial payment or tax charge.
- **Corporate Tax Advisory Services** - Our corporate tax advisory work forms the core of the tax services we provide, both within the United States and internationally. Our lawyers regularly help clients structure their international operations to lower their worldwide effective tax rate. Our lawyers also deal with all aspects of corporate and commercial taxes representing public and private companies, both buyers and sellers, in international mergers and acquisitions around the world. We know how to structure mergers, acquisitions, takeovers, reorganizations, and other corporate transactions, which very often are tax driven, and work to reduce tax both on the transaction itself and going forward. We help clients integrate acquired businesses in a tax-effective manner and also advise on the tax implications of structured finance, leasing, and collective investment arrangements.

## EXPERIENCE

---

- Represented a global leader in water, hygiene and energy technologies and services in a global restructuring that involved the transfer of 300 legal entities from 90 countries into a complex Dutch and Luxembourg holding company tax structure
- Representing one of the fastest growing cybersecurity companies in the design and implementation of an international structuring project involving 15 countries
- Represented a leading networking infrastructure company in its global restructuring involving nearly every European jurisdiction and including a Dutch Advanced Pricing Agreement (APA) that achieved unprecedented results
- Advising a leading developer, marketer and distributor of branded performance apparel on global transfer pricing, international tax and IP restructuring issues
- Secured significant results for one of the largest toy and game companies: defended its international business operating structure from challenges by the IRS, and converted Asian sales affiliates to limited risk distributors