

INTERNATIONAL BUSINESS AND TAX

MANAGING THE IMPACT OF GLOBAL MARKETS

Today, few companies operate without some form of exposure to global markets. Opportunities exist with global suppliers, operations, and customers. Our association with the BDO Alliance USA gives us access to worldwide resources and experience in tax, global sourcing, and local market issues. Our International Tax Network is comprised of experts in the areas of partnership, corporate and individual tax and business planning, mergers and acquisitions, and dispositions of business for domestic and multinational organizations.

TRANSFER PRICING

Intercompany pricing is a primary target for international tax examiners who are aggressively challenging businesses on transfer pricing methodologies. We can assist businesses with establishing reasonable bases for price positioning to avoid penalties or mitigate impact.

- risk assessment
- documentation
- review
- negotiation
- management

TAX PLANNING AND STRATEGY

Effective tax management begins with forward-thinking tax planning and strategy. And tax management is an integral part of a well-planned international business strategy. We can assist you with proactive planning to maximize growth and minimize taxes, no matter where in the world you operate.

- global tax minimization studies
- analysis of income treaties
- tax issues in specific geographies
- IC-DISC
- tax planning and compliance services (inbound/outbound)
- tax accounting for international operations
- repatriation of foreign income
- FIRPTA compliance

TRANSACTION STRUCTURING

In conducting business internationally, your choice of entity or the form of a transaction has significant legal, business and tax implications both at home and abroad. We can design tax-efficient structures for:

- cross border M&A
- spin-offs
- joint venture formations
- foreign corrupt practices awareness

TAX CREDIT PLANNING

Reducing overall tax burdens is key for any company doing business internationally. Balance between domestic and foreign tax regimes is critical to the success of the international tax plan.

- managing excess foreign tax credits
- avoiding under-utilization of foreign tax credits
- maximizing low-taxed foreign source income
- minimizing foreign taxes paid

INTERNATIONAL ASSIGNMENT SERVICES

The transfer of assets and personnel from one country to another can be trying for any organization. These challenges can create tax opportunities for the well advised business and its workers.

- home and host country tax compliance
- tax calculations for equalization reimbursement
- expatriate and repatriate tax returns
- foreign bank account reporting

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