

## In the developing global economy, corporations increasingly look for cross-border investments and business opportunities.

These opportunities can involve penetrating foreign markets in a number of ways, including operations through a branch, a subsidiary or entering into a joint venture with an unrelated partner. Each of these forms has different tax and non-tax consequences, and the decision of how and when to enter a new market will depend on the overall investment goals you're seeking to achieve.

The Tax Cuts and Jobs Act (TCJA) of 2017 lowers tax rates for businesses and individuals and creates a new territorial tax regime for taxation of international business operations. Carefully planned international tax strategies and precise compliance will deliver tax savings for your business at home and abroad.

Whether your company is domestic or foreign, large or small or privately or publicly-held, Sikich will design a custom-made international tax strategy to address the specific needs of your business, integrating both U.S. and foreign tax analysis. Our tax consultants will keep you up-to-speed on the international tax developments pertinent to your business and will reach out to you in a timely manner if changes in foreign or U.S. international tax rules warrant revisions to your ongoing tax reporting and forward-looking strategies.

## Outbound tax planning

U.S. taxpayers that are expanding business operations outside of the country need a firm you can trust to provide guidance throughout your journey. Our tax professionals will evaluate your business model, existing financial position and goals going forward—providing the following solutions:

- Optimize the usage of foreign tax credits to minimize or eliminate double taxation
- Determine the proper allocation of income and expenses in intercompany transactions with foreign affiliates pursuant to the transfer pricing rules and assist with the preparation of the transfer pricing documentation
- Prepare proper documentation necessary to report foreign activities on U.S. tax returns
- Recommend the proper form of foreign entity to meet business and investment goals
- Design the most tax-advantageous forms of acquisition, disposition or reorganization of foreign operations from both the U.S. and foreign tax perspectives

## Inbound tax planning

For foreign taxpayers that are investing in the U.S. market, it's crucial to review your foreign ownership structure, the type of cross-border transactions you're dealing in and your investment goals. Our

tax professionals can recommend the proper type of U.S. entity to fit your business objectives, forms of financing of U.S. operations, tax efficient cash repatriations and preparation of U.S. forms to comply with tax reporting requirements.

## Export incentives

Identifying and taking advantage of export incentives is also often top-of-mind for taxpayers in your situation. Sikich can assist with IC-DISC, Foreign Derived Intangible Income (FDII) and other international tax incentives.

## Expatriate tax practice

Our expatriate tax services are designed to assist U.S. citizens living and working internationally as well as foreign employees in the U.S. with minimizing double taxation on their employment and business income through foreign tax credits, various exemptions and necessary compliance.

## Cross-border trusts and estates

Foreign or U.S. beneficiaries of cross-border trusts and estates are responsible for handling taxes and often complicated compliance. Our tax planning team can help calculate those taxes, offer guidance on potential tax challenges and assist you in taking advantage of eligible benefits.



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