

Saturday

2:00PM – 4:00PM

Your Multinational Client is Reorganizing its Global Business Operations: A Checklist for the Tax Professional

The session will focus on the transfer pricing and international tax implications for a US-based multinational expanding its operations in the North American, European and Asia Pacific Regions, while seeking to achieve tax savings to help finance that expansion by reorganizing its business operations in a tax efficient manner. The panelists will discuss opportunities in light of new tax developments both in the US and elsewhere, which will impact planning by the multinational to relocate its R&D and intellectual property to a lower tax jurisdiction (including cost sharing), to convert current manufacturing and sales operations and to centralize procurement and other group services as well as reallocate business risk and management oversight functions.

Moderators: David Canale, Ernst & Young LLP, Washington, DC

Elinore Richardson, Borden Ladner Gervais LLP, Toronto, Canada

Sponsored by: Transfer Pricing Committee; supported by Foreign Activities of US Taxpayers Committee, US Activities of Foreigners and Tax Treaties Committee and Foreign Lawyers Forum