



Navigating Global Tax with Confidence and Foresight

Cross-border commercial and investment activities offer immense growth potential and significant opportunities for many businesses and investors. This reward potential comes with significant complexity, risks, and traps for the unguided.

Whether your business seeks to explore the initial phases of international expansion or has already developed an international

footprint, innovative and customized global tax planning is essential to ensuring future success and managing financial and reputational risks

KBF's International Tax and Transfer Pricing team guides businesses and investors in expanding across borders while managing tax risk, reducing complexity, and maximizing opportunities. Whether you are investing abroad (Outbound) or entering the US market (Inbound), our team of specialists deliver strategies that align with your global business and investment objectives.

OUR INTERNATIONAL TAX SERVICES INCLUDE

Outbound Tax Services

Assisting US-based companies and investors to successfully structure and manage international operations.

• Cross-Border Structuring, Planning & Transactions

- Entity structuring and jurisdiction selection
- Tax-efficient financing strategies
- Global intangible low-taxed income (GILTI) / Net CFC tested income (NCTI), Foreign-derived intangible / Deduction eligible income (FDII / FDDEI), and Base Erosion and Anti-Abuse Tax (BEAT) Analysis and Planning
- Supply chain / IP tax optimization
- Tax Treaty Analysis and Planning

• Foreign Tax Credit, Repatriation, & Cash Management

- Maximizing credits to reduce double taxation
- Strategies for tax-efficient return and global redeployment of profits
- Managing withholding taxes
- Foreign E&P and basis computations, and foreign currency quantification under sections 987/988

• International M&A Support

- Due diligence support on global acquisitions/dispositions
- Outbound acquisition structuring
- Post-deal integration for tax efficiency

• International tax and ASC 740 Analysis, Preparation, and Support

- Analyze and prepare international tax areas of provisions to support audit and regulatory review
- Preparation and review of international tax computations and forms



OUR INTERNATIONAL TAX SERVICES INCLUDE

Inbound Tax Services

Guiding non-US companies and investors with tax-efficient entry and expansion into the U.S. market, and appropriate structuring for real estate and other investments.

• US Inbound Structuring, Planning & Transactions

- Optimal choice of entity for business / investment (i.e., corporation, pass-through, or branch)
- Cross-border financing, capital structuring, and treasury management
- US trade or business / permanent establishment risk assessment and treaty-based analysis and planning
- US real estate investment structuring and disposition planning
- Treaty-based planning to reduce withholding taxes

• Withholding and Branch level taxes

- Reducing cash leakage on inbound transactions via treaty or statute
- Analyzing and computing branch-level taxes
- Inbound debt financing computations under US regulations 1.882-5

• US Inbound M&A Support

- Due diligence support on US acquisitions/dispositions
- Inbound acquisition structuring
- Post-deal integration for tax efficiency

• International tax and ASC 740 Analysis, Preparation, and Support

- Analyze and prepare international tax areas of provisions to support audit and regulatory review
- Preparation and review of international tax computations and forms





Why Choose KBF International Tax?

1

Deep experience with multinational businesses and investors

2

Practical solutions that go beyond compliance and are aligned with the company's global functional and operational footprint

3

Guidance on the latest U.S., OECD, and other global tax developments

To learn more about our International Tax Services, contact Scott Montopoli at smontopoli@kbfadvisory.com or Tyler LeFevre at tlefevre@kbfadvisory.com.

KBF is a rapidly growing professional services firm that offers a comprehensive range of tax, assurance and advisory services. KBF is a recognized leader in Accounting for Income Tax (ASC 740) and GAAP advisory services. KBF serves hundreds of public, private equity-owned and venture-backed companies, as well as select dynamic privately-held businesses.

"KBF" is the brand name under which KBF CPAs - Audit, LLP ("KBF Audit") and KBF Advisory, LLC ("KBF Advisory") provide professional services. KBF Audit and KBF Advisory practice in an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations, and professional standards. KBF Audit is a licensed independent CPA firm that provides attest services to its clients, and KBF Advisory provides tax and business consulting services to its clients. KBF Advisory is not a licensed CPA firm.