

Opportunities and Risks of

Cross-Border Business

Globalisation offers a wide range of opportunities which should be seized. However, risks of double taxation or accidental taxation of hidden reserves often will not be detected in time and thus common strategies to avoid taxation cannot be used because of lack of information. This can easily sum up to significant amounts for companies as well as for private individuals.

Firms that have shareholders, affiliate companies, branches, clients or suppliers abroad or simply like to reduce their group's total tax burden by sophisticated tax structures will not be able to avoid contact with questions of international taxation. In case of audits by the fiscal authorities, verification of cross-border issues is gaining more and more importance. It is thus indispensable to adopt adequate means for prevention, e.g. by detailed documentation of transfer prices.

Private individuals with foreign income, double residence or long-term stays abroad are in danger to become subject of double taxation in various countries.

Only those who identify these risks in time, will be in condition to use them for their own benefit and save taxes. Our experts will be happy to assist you with that!



Our Services for Companies

- Fiscal representation
- Choosing the right legal form and location
- Structuring foreign investments of German companies (outbound)
- Structuring of national investments of foreign entities (inbound)
- Taxation of corporations, partnerships and permanent establishments abroad
- Allocation of international income
- International tax planning to reduce the group's tax rate
- Setting-up of holding structures
- Advice on transaction processes in international sales and acquisitions of companies
- International reorganisation tax law
- VAT-questions in cross-border deals
- Tax planning of international assignments
- Revision of intercompany service agreements in order to comply with the arm's length principle
- Setting-up a transfer price documentation and revision of the arm's length principle via data base research
- Transfer of functions
- Cost sharing and pooling agreements
- Licence agreements
- Transfer of pension obligations to foreign entities in case of company transfer
- Assistance in audits with international context, by the fiscal authorities
- Cross-border tax due diligence



Our Services to Well-Off Private Individuals

- Taxation of foreign investment and rental income obtained by Germans
- Recovery of withholding tax
- Taxation of international assignments
- Taxation of non-residents in Germany
- Taxation in case of multiple residence
- Taxation of cross-border commuters
- International inheritance and gift tax planning
- Tax structuring of testaments, inheritance contracts and legacies
- Filing of inheritance and gift tax returns

Do you have any questions?

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Our Expertise - Your Benefit

- Knowledge & Experience
- Worldwide Independent Alliance

Knowledge & Experience

Our team of professionals is skilled and experienced in all kinds of questions of international taxation. Our managing partner Oliver Biernat has been appointed 'Certified Advisor in International Taxation' by the Chamber of Tax Consultants. He is also chairman of the GGI International Taxation Practice Group, where more than 550 tax experts from 90 countries meet regularly to exchange experience and knowledge.

Worldwide Independent Alliance

We are an independent member of GGI Global Alliance AG, the world's biggest¹ global multidisciplinary alliance of accounting, tax consulting, law and business consulting firms with members in more than 120 countries. This is for us the platform for international up-to-date information and for our clients the guarantee for highly qualified consulting all over the globe.

¹ see Accountancy Magazine, 2016



Who to contact

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* All qualifications are translations from German titles



International Taxation



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