International Tax

Meet the Demands of a Changing World
The Changing World of International Tax

The international tax landscape has changed. With major legislative movements like BEPS, FATCA and CRS, there are new layers of tax transparency as tax authorities are joining forces to standardize regulations across jurisdictions. What used to take years to become law is now taking a fraction of the time to move from proposal to enactment. You need to keep up, and you need to keep up in every jurisdiction where your company or clients operate.

In addition, heightened press coverage, through media maelstroms around the Panama Papers and Lux Leaks, has created greater public awareness about multinational tax practices — and growing cynicism as to whether companies are paying their “fair share.” Plus advances in technology make it possible for tax authorities to share information like never before. That means for the very first time, they have the will and the means to gain visibility into every company’s global tax strategies.

This is a new world for tax departments and their advisors. The days of simply identifying a strategy that resulted in the lowest possible effective tax rate are gone. You need to strike a balance between both legal and public expectations, factoring in corporate objectives around achieving a low effective tax rate, new impact for departments within the organization like Finance, HR, Legal and Supply Chain and reputational risks from public perception. Is your approach legally defensible, operationally optimized and reputationally safe?

All of this requires you to consider more options.

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Don’t Just Keep Up — Stay Ahead

Provide your company with the versatility to adapt to the changing environment.

By leveraging the purpose-built international tax tools and resources from Thomson Reuters Checkpoint®, you can:

- Become more broadly versed across a range of new international tax considerations
- Surface more options and quickly quantify the impact of complex tax rules on current or planned business activities
- Perform internal vetting to rule out obvious non-starters

Thomson Reuters Checkpoint includes laws, treaties and other in-depth primary source content coupled with expert editorial analysis and insights, up-to-date current awareness news and research tools that help bring each jurisdiction’s tax and business environment to life.

With all of the information you need in one place, you’ll free up time to strategically work through regulatory change and refocus your energy on the implications to your company or clients. Keep pace with the change in your company, clients and the world — and drive added value by delivering operational recommendations to the C-suite.

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- **Orbitax** is the comprehensive solution that aligns your tax research, compliance and planning needs across all of your global businesses.

- **Worldwide Tax and Commercial Law** provides completed and updated tax and business laws for over 180 jurisdictions translated into English.

- **IBFD** unlocks a wealth of valuable international tax research resources for global tax practitioners to develop tax strategies for their companies and clients.
Global and Regional Coverage

**Orbitax** is the comprehensive solution that aligns your tax research, compliance and planning needs across all of your global businesses. Covering over 120 global jurisdictions, this unique resource saves time by putting a full range of international tax research materials and tools on one easy-to-use platform. With its extensive and powerful research and analysis tools, you’ll be able to complete your daily global tax tasks efficiently and develop business strategies that align with ever-changing and complicated compliance regulations.

- Manage your tax costs with tax planning calculators such as the WHT Minimizer, which identifies the top 20 cost-efficient ways to route a cross-border transaction.
- Access the relevant Tax Forms in both English and native language.
- Save time with powerful translation and FX conversion tools.
- Efficiently research the relevant tax structure elements of various entities with our Country Guidance and Tax Treaty coverage.
- Model a visual representation of your entities and cross-border transactions between entities with the Entity Charting and Worldwide Tax Calculator.
- Track important deadlines with the Tax Calendar and pinpoint filing requirements with Compliance Checklists so you don’t incur penalties on late or incorrect returns.
- Keep track of approved and proposed updates to domestic tax laws and treaty developments in the Daily News to ensure your company is prepared to respond to any changes.

**Worldwide Tax and Commercial Law** provides completed and updated tax and business laws for over 180 jurisdictions translated into English, including links to relevant government websites. The coverage includes Income Tax Laws, Corporate Tax Acts, VAT Laws, Banking Laws, Commercial Codes and more.

**IBFD** unlocks a wealth of valuable international tax research resources for global tax practitioners. Develop tax strategies for your company or clients with comprehensive and extensive coverage of topics and information related to international taxation for over 215 countries.

- Streamline your research by accessing information for multiple jurisdictions in one place, eliminating the need for navigating through multiple websites and language barriers.
- Compare multiple jurisdictions side-by-side and easily assess opportunities and risks with Country Survey and Analysis standardized outline formats and Table Summary views for Treaties, Tax Rates and more.
- Customize on a regional, country or topical level and manage costs by subscribing to portfolios focused only on those that are relevant.
- Assess the risk of doing business and investing in certain jurisdictions with independent and reliable information.
- Stay on top of tax trends and treaty case laws affecting a jurisdiction or country with daily news updates linked to relevant source content highlighting new and changing regulations.
U.S. INTERNATIONAL

Checkpoint Catalyst delivers tax research framed in an entirely new way, so you can see the clarity, color and context you need to get the whole picture of each business tax issue. Checkpoint Catalyst is a collection of Topics that examine specific tax issues and business transactions from a practical, workflow perspective. Federal, state and U.S. international tax implications are part of the main topic discussion, saving you significant time. With multiple expert perspectives and embedded tools and diagrams, you can take action with confidence and ensure you don’t miss a thing.

WG&L International Treatises provide comprehensive discussion, analysis and practical advice concerning critical areas of the tax law and non-tax law as it relates to tax-driven transactions. Recognized in the industry as THE analytical source material for tax practitioners, WG&L titles cover research, planning and compliance. Each treatise provides in-depth coverage of most, if not all, of the international concerns, inbound and outbound, in a single publication.

- Andersen: Analysis of United States Income Tax Treaties
- Andersen: Foreign Tax Credits
- Bittker and Lokken: Fundamentals of International Taxation: U.S. Taxation of Foreign Income and Foreign Taxpayers
- Dolan, Jackman, Dabrowski and Tretiak: U.S. Taxation of International Mergers, Acquisitions and Joint Ventures
- Dyson and Lloyd: Critical Issues Series: U.S. Information Reporting and Withholding at the Source — FATCA
- Hardesty: Electronic Commerce: Taxation and Planning
- Kuntz and Peroni: U.S. International Taxation
- Levey: U.S. Taxation of Foreign-Controlled Businesses
- Lowell and Martin: U.S. International Transfer Pricing
- Lowell and Martin: Transfer Pricing Strategies
- Lowell and Martin: U.S. International Taxation: Agreements, Checklists and Commentary
- Michaels: International Taxation: Withholding
- Neville: International Trade Laws of the United States
- Terkper: VAT Handbook

WG&L Journals provide sophisticated reporting, analysis and planning from expert authors around the globe. As businesses become increasingly global, you can look to WG&L Journals as a resource for in-depth analysis and guidance on both U.S. and non-U.S. international tax developments.

RIA International Portfolios — Tax Advisors Planning System focuses on specific issues critical to both U.S. corporations doing business abroad and foreign corporations doing business in the U.S., so you can solve problems and implement planning strategies for your closely-held business clients. Written and updated monthly by a network of active, expert practitioners, you’ll have quick and thorough answers to business tax questions, plus the materials to act on them.
**BEPS**

*Checkpoint BEPS Global Currents* provides the clarity and perspective you need to see beyond the surface of the OECD BEPS Action Plan and better understand its impact on your organization. With a customizable dashboard that offers side-by-side coverage of the latest BEPS developments for all 15 Action Items in 48 countries, you can respond proactively to new information, make strategic plans to minimize impact to your organization and ensure you are in compliance with new laws and standards as they are passed.

*ONESOURCE BEPS Action Manager* combines research, data management, entity charting, document storage, reporting and analytics in a single solution, enabling worldwide compliance and multidisciplinary collaboration for multinational enterprises in a post-BEPS era. Across the globe, from start to finish, ONESOURCE BEPS Action Manager lays the foundation for a standardized and sustainable worldwide country-by-country compliance process, enabling multinational enterprises to document and defend their results to taxing authorities.

**TRANSFER PRICING**

*Transfer Pricing Analyzer* provides the information and tools you need to quickly research a range of transfer pricing rules from multiple countries, make comparisons, draw initial conclusions and create reports and memoranda to document transfer pricing issues impacting your entities around the world.

*IBFD Global Transfer Pricing Explorer Plus* includes transfer pricing analyses and overviews for more than 60 countries, covering documentation requirements, deadlines, transfer pricing methods, penalties, intangibles, business restructuring, customs valuation, intra-group financing, advance pricing agreements and competent authority matters.

**VAT**

*IBFD VAT Worldwide* provides a country-by-country overview of the different national VAT systems currently in use throughout the world, formatted in standardized outlines for easy comparison. It includes detailed analyses and topical information on VAT for major economies.

**FATCA**

*FATCA Essentials* provides all of the expert guidance you need to understand and comply with FATCA reporting rules. With a comprehensive collection of primary source materials, detailed commentary and analysis from recognized international tax experts, comprehensive coverage from over a dozen international tax journals and daily coverage of new developments, you can streamline your FATCA research.

**CREDITS AND INCENTIVES**

*Credits and Incentives Pinpointer: International* identifies and tracks credits and incentives for more than 20 credit types in close to 60 countries so you can make the most of global investment opportunities. Whether you’re doing business in Brazil or setting up new operations in India, you can be confident that you aren’t missing any potential opportunities.
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