





2023 YEAR-END PLANNING FORUM

State, local and international tax year-end planning

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With you today



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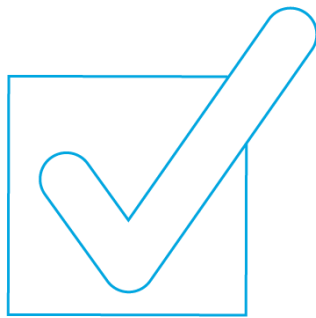


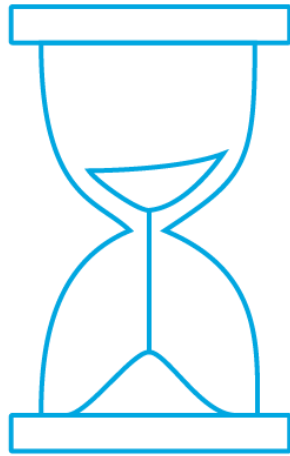
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Learning objectives

By the end of this presentation, participants will be able to:

1. Determine the relevance of apportionment and sourcing reviewing in a “post-nexus” landscape.
2. Recognize a growing sales and use tax footprint among most businesses.
3. Identify key international tax topics that may affect their business.
4. Recognize potential global information reporting obligations.



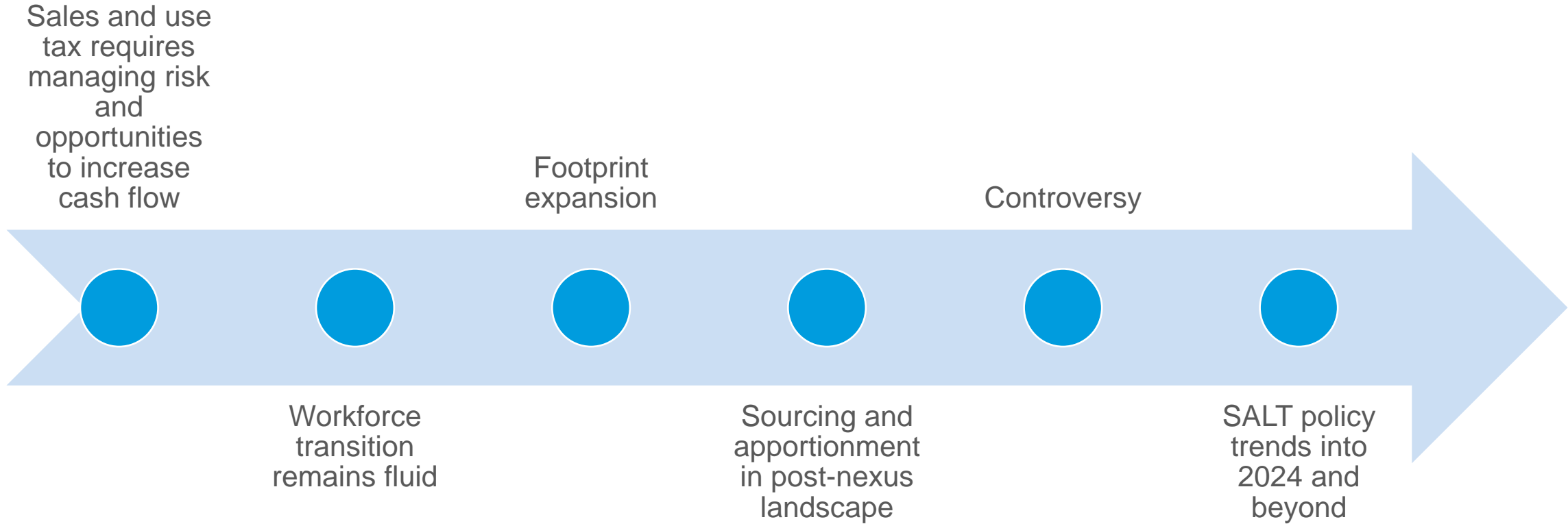


Today's session will consist of year-end planning concepts in two key areas of business:

- State and local tax
- International tax

State and local tax

State and local tax year-end planning



Resources

- Webcast:

[A modern approach to complex state and local tax compliance leveraging technology](#)

International tax

International tax year-end planning

- Consider planning strategies for foreign-derived intangible income (FDII), which may offer significant deductions for certain C corporations
- Implement global intangible low-taxed income (GILTI) planning opportunities
- Reevaluate transfer pricing agreements
- Assess incremental tax and compliance costs for OECD Pillars One and Two
- File section 965 protective refund claims if available
- Analyze applicability of anti-hybrid rules and their impact on deductions
- Implement passive foreign investment company (PFIC) planning strategies
- Other considerations

Other international tax items

Taxpayers should consider taking advantage of additional planning opportunities, such as:

- Modeling the impact of changes to sections 163(j) and 174 to assess potential incremental tax and compliance costs
- Reviewing their global structure to analyze whether any of their subsidiaries have a deemed hyperinflationary currency to comply with dollar approximate separate transactions method (DASTM) reporting
- Analyzing how the new mandatory e-invoicing requirement will affect business
- Monitoring forthcoming guidance on the U.S. treaty network to determine when and if they can take advantage of treaty benefits such as:
 - Reduced rates of withholding on dividends, interest and royalties
 - Exemption from taxation on certain items of income they receive from sources within the United States

International tax reporting and withholding considerations

Taxpayers should take steps now to minimize risk and exposure next year including:

- Analyze the impact of changes in the rules and recent enforcement trends
- Collect new and review existing tax withholding certificates and treaty claims
- Review your global structure, refreshing FATCA statuses, and registering new entities
- Assess your compliance with reporting and withholding requirements by performing a health check to identify gaps in your processes
- Ensure proper migration of reportable data for new ERP system implementations
- Confirm access to data in legacy systems for newly acquired entities
- File any unfiled info returns now to start the statute of limitations

RESOURCES

- [International tax year-end considerations](#)
- [Top reporting and withholding actions to take before year-end](#)



QUESTIONS AND ANSWERS

THANK YOU FOR
YOUR TIME AND
ATTENTION



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