

THE POWER OF BEING UNDERSTOOD

TRANSFER PRICING

Create greater efficiency with supply chain structuring services

How effective is your global supply chain structure?

Are you acquiring a foreign company or restructuring your current foreign operations?

What are the key functions performed, assets utilized, and risks assumed within the supply chain?

In which jurisdictions are the economic activities being performed?

Efficiency in your global supply chain is critical to your bottom line. Acquiring a foreign company or restructuring your foreign operations impacts the efficiency of your supply chain and can also carry greater implications.

Whether you are relocating functions, risks or people, you will need to address certain factors, including:

- Valuations of transferred activities and assets
- The arm's-length nature of such transactions with respect to impacted taxing jurisdictions
- Alignment and compatibility with your business model
- Integration of tax planning with the business change
- Other operational disruptions and issues

RSM's supply chain structuring services team can help you address these issues and design and implement efficient supply chain structures.

Reallocate functions, risks and people in the most tax-efficient manner

Our team helps you identify functions, risks and people in order to reallocate them in the most tax-efficient manner, all within the context of your overall business objectives.

We will help you analyze the many business changes associated with modifying your supply chain processes. Points of evaluation include:

- Strategic planning
- Design
- Research and development
- Production
- Marketing
- Distribution
- Logistics
- Support administration

After specific processes have been properly analyzed, the functions performed by the various parts of the supply chain, as well as the associated risks, are rationalized to achieve the maximum cost efficiency. Because taxes may represent a large part of your overall costs, supply chain structuring typically addresses potential tax savings as an essential element of the overall process.

Potential benefits

Potential benefits of a supply chain restructuring include:

- Integration of tax planning with your business change processes
- Alignment of the tax base with the economic activities in a respective country
- Lowering of your worldwide effective tax rate

Global coverage, one point of contact

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