Infinity Globus
a springline company

International Tax Services

Robust international tax services designed to navigate complex cross-border regulations with clarity and compliance discipline.

Core International Tax Services Categories

Global Structuring & Transaction Support

- Strategic entity design
- Holding company structuring and international tax-efficient architecture
- Advisory on new jurisdiction market entry
- Cross-border cash flow planning
- Tax treaty analysis and application support
- M&A transaction structuring
- Repatriation planning and profit distribution strategies
- Permanent Establishment (PE) risk assessment

Transfer Pricing Services

- Preparation of transfer pricing documentation
- Functional analysis (FAR analysis)
- Economic benchmarking studies
- Arm's-length pricing analysis in accordance with OECD guidelines and local regulations
- Review and analysis of intercompany agreements
- Evaluation of controlled transactions
- Support for Advance Pricing Agreements (APA)

Global Tax Compliance & Information Returns

- Preparation of international information returns, including Forms 5471, 5472, 8865, and 8858
- Foreign bank and financial account reporting (FinCEN Form 114 – FBAR) compliance
- Foreign asset reporting under applicable U.S. reporting requirements
- Compliance management for foreign corporations and foreign trusts
- Withholding tax compliance and reporting
- Treaty-based return positions and disclosure support

Engagement Models

MODEL 1

Dedicated Support (FTE Model)

- Ongoing international tax advisory and compliance support
- Continuous monitoring of cross-border exposure
- Fixed monthly engagement

MODEL 2

Project-Based Engagement

- Transfer pricing studies and cross-border restructuring projects
- Treaty analysis or PE studies
- Defined scope with fixed fee per assignment

MODEL 2

Hourly Model

- Technical advisory consultations and transaction-level structuring advice
- International tax opinion drafting
- Billed based on time incurred

Value Proposition

- **Global Tax Risk Visibility**
  Clear identification and management of cross-border tax exposure.
- **Structuring for Efficiency**
  Strategic entity and transaction structuring to optimize global tax outcomes.
- **Regulatory Alignment Across Jurisdictions**
  Compliance with evolving international tax regulations, including OECD & local frameworks.
- **Transfer Pricing Defensibility**
  Documentation and economic analysis designed to withstand regulatory scrutiny.
- **Commercially Practical Solutions**
  Tax strategies aligned with business objectives, not just technical theory.
- **Scalable International Support**
  Flexible engagement models suited for startups, mid-market, and multinational enterprises.

Scope Overview

Structural & Transaction Planning

- Entity structure review
- Cross-border cash flow planning
- Treaty application analysis

Transfer Pricing Analysis

- Intercompany pricing review
- Benchmarking and economic studies
- Documentation preparation

Compliance & Reporting

- International tax filings
- Foreign asset reporting
- Withholding and treaty compliance

Advisory & Ongoing Monitoring

- Permanent establishment risk analysis
- Expansion into new jurisdictions
- Ongoing international tax risk assessment

Contact Us

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SCAN TO GET IN TOUCH!