

Skadden's International Tax Group has extensive experience in strategic tax planning and tax implementation issues associated with multijurisdictional, cross-border transactions. We also represent clients in cross-border tax controversies, including advising on transfer pricing and competent authority matters, and managing and resolving disputes arising from global, regional and bilateral business transactions.

With tax attorneys resident in the United States, the United Kingdom, France and Germany, we have experience providing advice in various jurisdictions and on a multitude of international tax issues. We are one of the few international law firms that clients can rely on for a combination of both domestic and cross-border tax advice within major transatlantic jurisdictions. In addition, over the years, we have established a network of local counsel with leading tax practices to whom we refer matters.

Our attorneys have extensive tax-related administrative and policy experience, with many having previously served in U.S. government positions, including at the Department of the Treasury, IRS and White House, as well as international tax counsel of the Congressional Joint Committee on Taxation. In addition, members of our European Tax Group sit on several U.K. revenue committees that consider key technical developments and help frame policy and legislation on tax issues.

Skadden's international tax work includes structuring cross-border migrations, acquisitions, divestitures, financing, and equipment leases; representing issuers and underwriters in U.S. and Euromarket offerings; creating multinational trusts; and advising on international joint ventures and international project financings in emerging markets. We also have substantial experience in multinational group restructuring and reorganization transactions, including pre-divestment separation and post-acquisition integration planning.

Our representations also include legislative, administrative and policy work, treaty negotiations and interpretation, unilateral and bilateral advance pricing agreements, and private letter rulings relating to international aspects of major transactions. Our work frequently involves novel and innovative types of transactions and new developments in changing areas of the law.

In addition, our tax attorneys routinely advise clients in connection with international tax controversy matters in all phases of the dispute

resolution process (*i.e.*, audits, enquiries, appeals, mediation, arbitration, competent authority proceedings and litigation). Our transfer pricing practice advises multinationals on international structuring, disputes and APAs. Our competent authority practice covers a wide range of issues raised by double tax treaties, including MAPs and APAs.

Our tax attorneys also counsel investors globally regarding their investments in U.S. and European ventures and international investment funds, as well as their tax treatment under domestic laws and international treaties.

Skadden has been repeatedly recognized by *Law360* as a Tax Group of the Year since 2015, and ranked No. 1 in *Vault's* Best Law Firms for tax every year since 2010. We also were named 2023 Tax Law Firm of the Year in *U.S. News — Best Lawyers*, and our European tax practice was named Best International Tax Team of the Year at the 2023 Tolley's Taxation Awards. Our international tax practice and its members are ranked in *International Tax Review's* annual *World Tax* guide as well as *Chambers USA*, *Chambers Europe*, *Chambers Global* and *Legal 500*.

“Skadden, Arps, Slate, Meagher & Flom is respected for both its global footprint and its important role in global transactions throughout a multitude of jurisdictions, particularly across Europe and the USA.”
— *Chambers USA 2024*