International Tax

Skadden

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.

International Tax

Continued

Skadden's tax practice and attorneys have been repeatedly recognized by leading industry outlets, including:

- *Chambers USA* as one of the top tax practices in Nationwide Corporate Tax and Nationwide Tax Controversy.
- *Law360* as a Tax Group of the Year since 2015.
- *ITR World Tax* as a Tier 1 tax practice in the U.S., U.K., France and Germany.
- *International Tax Review*'s Annual Awards, including as:
  - North America Tax Law Firm of the Year, Washington DC Transfer Pricing Firm of the Year, and Northern California Tax Firm of the Year at the 2026 Americas Tax Awards.
  - UK Tax Law Firm of the Year and Germany Tax Litigation Law Firm of the Year at the 2026 Europe Tax Awards.
- *Vault*'s Best Law Firms for tax every year since 2010.
- *Lexology Index* as its 2025 Corporate Tax Team of the Year.
- *Chambers Global*, *The Legal 500*, *International Tax Review*'s annual World Tax guide and *Best Lawyers*' Best Law Firms.

"Leading firm with outstanding bench strength and renowned expertise spanning the full spectrum of domestic and international tax matters."
— *Chambers USA 2026*