

Members of the International Tax Group at Skadden have 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, France, Germany and the United Kingdom, the firm is capable of providing advice in various jurisdictions on a multitude of issues. We are one of the few international law firms that provides a combination of both domestic and cross-border tax advice within the major European jurisdictions. For those jurisdictions in Europe in which we do not have attorneys resident or licensed, we have established a network of local counsel to whom we refer matters.

Skadden has been named *Law360's* Tax Group of the Year every year since 2015, as well as No. 1 in *Vault's* Best Law Firm for tax every year since 2010. We also were recently named 2023 Tax Law Firm of the Year in *U.S. News — Best Lawyers* as part of the publication's 13th edition of the Best Law Firms rankings. The European tax team was named Best International Tax Team at the Tolley's Taxation Awards 2023. The 2024 edition of *ITR World Tax* ranked Skadden as a leading firm in both the U.S. and Western Europe, including as the only firm to achieve Tier 1 rankings for Transactional Tax in all four of the key trans-Atlantic financial centers of Frankfurt, London, New York and Paris. We also garnered Tier 1 rankings for General Corporate Tax, Transfer Pricing and Tax Controversy. Our international tax practice and its members are repeatedly recognized in the highest bands of *Chambers USA*, *Chambers Europe*, *Chambers Global*, *International Tax Review*, *The Legal 500* and *Tax Directors Handbook*.

Several attorneys in Skadden's International Tax Group have extensive tax-related administrative and policy experience. Attorneys in our U.S. Tax Group have previously served in U.S. government positions, including at the Department of the Treasury, IRS and Department of Justice, as well as international tax counsel of the Congressional Joint Committee on Taxation and the U.S. competent authority on cross-border tax issues and treaties. 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, hybrid and other financings, and equipment leases and related financings; 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 post-acquisition restructuring, frequently teaming with the Big Four accounting firms. Our representations 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. Frequently, our work involves novel and innovative types of transactions and new developments in changing areas of the law.

In addition, Skadden attorneys routinely advise clients in connection with international tax controversy matters, including transfer pricing, in all phases of the dispute resolution process (*i.e.*, audits, appeals, mediation, arbitration, competent authority proceedings and litigation). Our transfer pricing practice advises multinationals on international structuring, disputes and APAs, and our competent authority practice covers a wide range of issues raised by double tax treaties.

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

The International Tax Group at Skadden, Arps has rendered international tax planning advice to a variety of clients, including Abercrombie & Fitch; Amazon; American Express; AstraZeneca; BlackRock; Covidien Ltd.; Daimler-Benz; Eaton Corporation; Eli Lilly; Exxon-Mobil; Fortress Investment Group; GlaxoSmithKline; Hasbro, Inc.; Hewlett-Packard Company; IBM; Johnson & Johnson; Liberty Mutual; McKesson Corporation; Merck; Merrill Lynch; MetLife; Pfizer Inc.; Royal Dutch Shell; Sara Lee Corporation; SwissRe; Transocean, Ltd.; Valeant Pharmaceutical; Visa, Inc.; and Yahoo!