Align Intellectual Property "IP" Structuring to Maximize Value

IP accounts for much of the enterprise value across multiple industry sectors. Many organization structures don't fully exploit the benefits of IP planning to maximize enterprise value and shareholders' return.

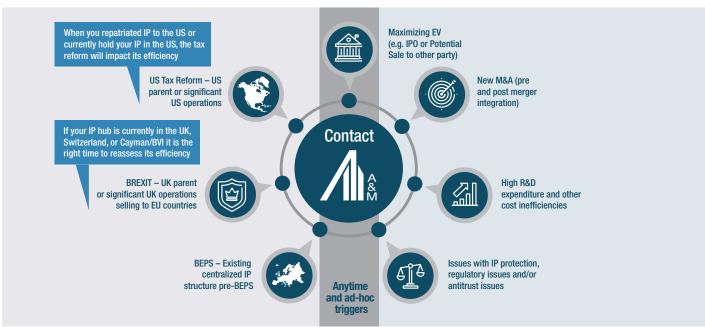
- IP has become one of the key value drivers for most businesses and across many industries
- Aligning IP structure with Tax and Transfer Pricing ("TP") maximizes benefits and adds stability
- Most governments are altering tax policy, jeopardizing previously "acceptable" IP structures
- NOW is the right time to accelerate your IP strategy and re-align your IP structure across legal, commercial and tax

Triggers Prompt Reassessment

There are many triggers that could prompt a reassessment of the current IP structure and/or strategy. If any of these triggers apply to you and your business it would be a good time to setup a brain storming session with our team to identify the best solution for your business.

TAX TRIGGERS

COMMERCIAL AND LEGAL TRIGGERS



Alvarez & Marsal Taxand employs a rapid assessment approach, quickly developing practical solutions to accelerate your IP strategy whilst ensuring flexibility and supportability in the ever changing tax environment.

Alvarez & Marsal Taxand has the experience, knowledge and tools to accelerate your IP strategy and growth. We offer customized solutions to answer the ever-changing needs of your business.



Our Track Record

- 200+ IP migration projects
- ~\$2b tax benefits derived
- 10+ successful IRS defenses
- 30+ publications
- 150+ combined years of experience



Our Approach

- Rapid Assessment
- Hands On Approach Senior Experts
- Extensive Financial Modeling & Valuations Expertise
- Global Advisory Reach
- Operational and IT Capabilities
- No audit-based conflicts

Recent Client Projects

Life Sciences

Advised pharmaceutical group migrating HQ from US to Europe and IP restructuring with leverage via patent box regime.

Media

Advised press and media group on cost/ benefit analysis, valuation and application for patent box regime in Italy.

Technology

Advised one of the largest UK processor and technology groups on optimizing global IP ownership including permanent establishment risk in the US and patent box regimes.

Consumer

Supported major LATAM food and drinks group transform operating models and establishing IP principal structure, mitigating duties and withholding.

Government

Helped Japanese government modernize IP regime for Japanese multinationals, including introduction of a patent box regime.

For more information, contact one of our experts:



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Alvarez & Marsal Taxand is a founder of Taxand, the world's largest independent tax organization, which provides high quality, integrated tax advice worldwide. Taxand professionals, including almost 550 partners and more than 2,500 advisors in 50 countries, grasp both the fine points of tax and the broader strategic implications, helping you mitigate risk, manage your tax burden and drive the performance of your business.

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