



International Tax

Foreign Tax Credit Review

With the ever-changing landscape and complexities of corporate taxation, more and more multinational corporations are leaving unclaimed foreign tax credits (FTCs) on the table. Because this calculation is typically handled towards the end of the federal tax return process, it's often up against a tight deadline and prepared based mainly upon the prior year's forms and calculations.

While these challenges are faced by all multinational companies, they represent a significant opportunity to perform a detailed review that can:

- ▶ Take advantage of the ten-year statute of limitations for correcting and claiming foreign tax credits
- ▶ Take advantage of the benefit of hindsight to make sure that all elements of the FTC calculation are optimized over the ten-year period such as the proper application of the overall domestic loss (ODL) and overall foreign loss (OFL) rules
- ▶ Perform a detailed review of all foreign-sourced income and deductions, including earnings and profits (E&P) and tax pool review on dividends over the years

Ryan's highly experienced team of International Tax specialists employs an approach that is focused on delivering substantial tax savings. Our proven methodology is highly technical and involves the investment of hundreds of hours to determine whether there is an opportunity to take additional credits. In addition to cash tax savings, this process generally leads to permanent effective tax rate savings on the financials.

Our clients receive a confidential and comprehensive reporting package that includes:

- ▶ Full details of all potential claims and credits
- ▶ Identified potential exposures
- ▶ Suggested process improvement opportunities that ensure continued savings in the future
- ▶ Detailed audit trail and full Internal Revenue Service (IRS) audit support

Once the claims and credits are approved by the client, Ryan assists with the preparation of all necessary support to go into any amended or original tax filings and will handle all discussions with the IRS as needed.

Ryan's unique compensation model for a Foreign Tax Credit Review engagement is performance-driven, taking the risk out of this highly technical and labor-intensive savings effort.



Ryan's Strategic Difference

Ryan's team of seasoned international tax professionals supports multinational corporations' efforts to manage their tax affairs in a challenging global environment through expertise in all areas of income tax, indirect tax, and transfer pricing.

Award-Winning Tax Services

For additional information, please contact your local Ryan representative.

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