

International Tax Restructuring Risk Assessment

Date: [Insert Date]

To: [Recipient's Name]

From: [Your Name]

[Your Title]

[Your Company Name]

[Company Address]

[City, State, Zip Code]

Subject: Risk Assessment for Proposed International Tax Restructuring

Dear [Recipient's Name],

We are writing to provide you with a comprehensive risk assessment regarding the proposed international tax restructuring of [Company Name]. As you are aware, restructuring can present significant opportunities; however, it also poses risks that must be evaluated thoroughly.

1. Objectives of the Restructuring

Outline the primary objectives of the proposed restructuring, including tax efficiency, operational synergies, and market positioning.

2. Key Risks Identified

- Regulatory Compliance Risks
- Transfer Pricing Issues
- Cross-Border Tax Implications
- Repatriation Risks
- Market Risk Factors

3. Mitigation Strategies

Propose strategies to mitigate the identified risks, including engaging with tax authorities, conducting transfer pricing studies, and ensuring legal compliance in all jurisdictions involved.

4. Next Steps

We recommend setting up a follow-up meeting to discuss the findings in detail and to outline the steps necessary to proceed with the restructuring while minimizing identified risks.

Thank you for your attention to this important matter. We look forward to your feedback and the opportunity to assist you further.

Sincerely,

[Your Name]

[Your Title]

[Your Company Name]

[Your Contact Information]