

# The Future of Mobility Series

# **TAXATION**

How to confidently manage tax regulations across new data-led automotive industry models



6000+ Lawyers and tax advisors



46 Countries



77 Offices



80+ Languages spoken



#1 Legal brand



250+ Jurisdictions

Connectivity and automation have become the beating heart of the automotive industry as new-generation cars take over outdated technologies. With digital disruption evolving at a pace that even regulators and tax authorities find hard to follow, automotive OEMs and suppliers are placing tax departments at the core of their strategies to efficiently predict and manage tax risks regulations affecting every strand of the business, from supply chain to transactions.

To reflect the new correlation between each aspect of fabrication and digital services within the automotive industry, tax management has to be a fully integrated service. As departmental silos are being replaced by a coordinated approach, tax teams have found our experts' help invaluable in understanding current regulations and preparing the ground for upcoming tax changes at international and local levels.

#### **KEY TRENDS**

Connectivity & Data	Electrification	Autonomy	Shared Mobility
Balancing data monetization with management of global tax risk	Re-alignment of tax structures to adapt to evolving supply chains	Complex tax issues linked to global portfolios involving cross-industry collaboration	Tax disputes arising from evolving use of global data
Compliance to new legislation on data and digitalization	New areas of tax disputes		Risk of double taxation

#### **OUR EXPERIENCE**

#### **Mergers & Acquisitions**

Germany — Advised leading provider of alternative and specialty parts with the transaction and auction process documentation, provided legal due diligence, drafted and negotiated the documentation for the transaction and prepared and filed the merger.

#### Tax disputes

UK — Advised leading car servicing and repair company in a dispute with HR Revenue & Custom over interest deductibility (non allowable purpose).

#### **Asset acquisition**

Pan-Europe — Advised major provider of products and services to global automotive OEMs on the acquisition of a global supplier of cooling solutions to commercial vehicles. The matter involved tax structuring and management incentive schemes.

#### Tax regimes

Brazil — Advised multinational OEM supplier on the legal and tax procedures related to the application for the concession of a special tax regime to be enjoyed in the State of Sao Paulo (deferral of ICMS on importations).

#### The Baker McKenzie difference

With 6,000+ lawyers covering 250+ jurisdiction across 46 countries, Baker McKenzie is a truly global firm with a finger on the pulse of developing trends. Our experts have in-depth knowledge of international tax law that they can effectively leverage at the local level depending on clients' needs.

#### **Industry Insights**

We are actively exploring our clients' changing legal needs arising from the automotive industry's ongoing transformation and the entrance of new players in the market through our Automotive Future Mobility project. We have been an early adopter of Design Thinking in the legal sector, working together with clients to transform our services so as to meet their needs.

#### **Coordination and efficiency**

We provide a global perspective through a local lens — we are where you need us to be drawing upon our global expertise, including a core

group of Automotive specialists and a strong network of leading local firms in established and newly opening markets.

#### Focus on business drivers and risks

We are the only law firm partner for the World Economic Forum's Center for the 4th Industrial Revolution, are sponsors of ReInvent Law in Frankfurt, and operate the Whitespace Legal Collab in Toronto.

#### Our practice

With over 350 lawyers specializing in the new mobility space, we represent a broad range of industry players across all areas of taxation law at local and international levels.

We can advise on the full range of issues — from IP protection, patent and trademarks to antitrust law, liability and data monetization.

In 2020, the Firm was named the best law firm brand for the 10th consecutive year by Acritas' Global Elite Law Firm Brand Index. ranking us Number 1 globally for awareness, favorability, consideration for multi-jurisdictional deals and for multi-jurisdictional litigation. The ranking is based on interviews with 1,596 senior legal buyers across the world's largest multinationals with revenues in excess of \$1bn.

#### What they say about us

"Sources praise the strength of the firm's international offering, with one source stating: It is regarded as a go-to law firm for cross-border deals and international tax advice."

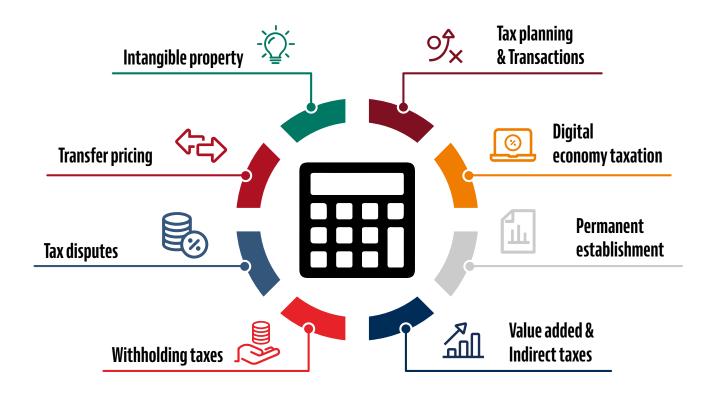
Chambers Europe 2019

"Sources praise the team's commercialism, noting: 'They combine strong business understanding with tax technical expertise which leads to robust though practical solutions that are always delivered on time."

Chambers Global 2019

#### TAXATION OF DIGITAL / DATA DRIVEN BUSINESS MODELS

### Our unique solutions



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