

Hybrid Entity Tax Haven Planning

International Tax Policy / AEI Forum

Paul Oosterhuis

Skadden, Arps, Slate, Meagher & Flom LLP

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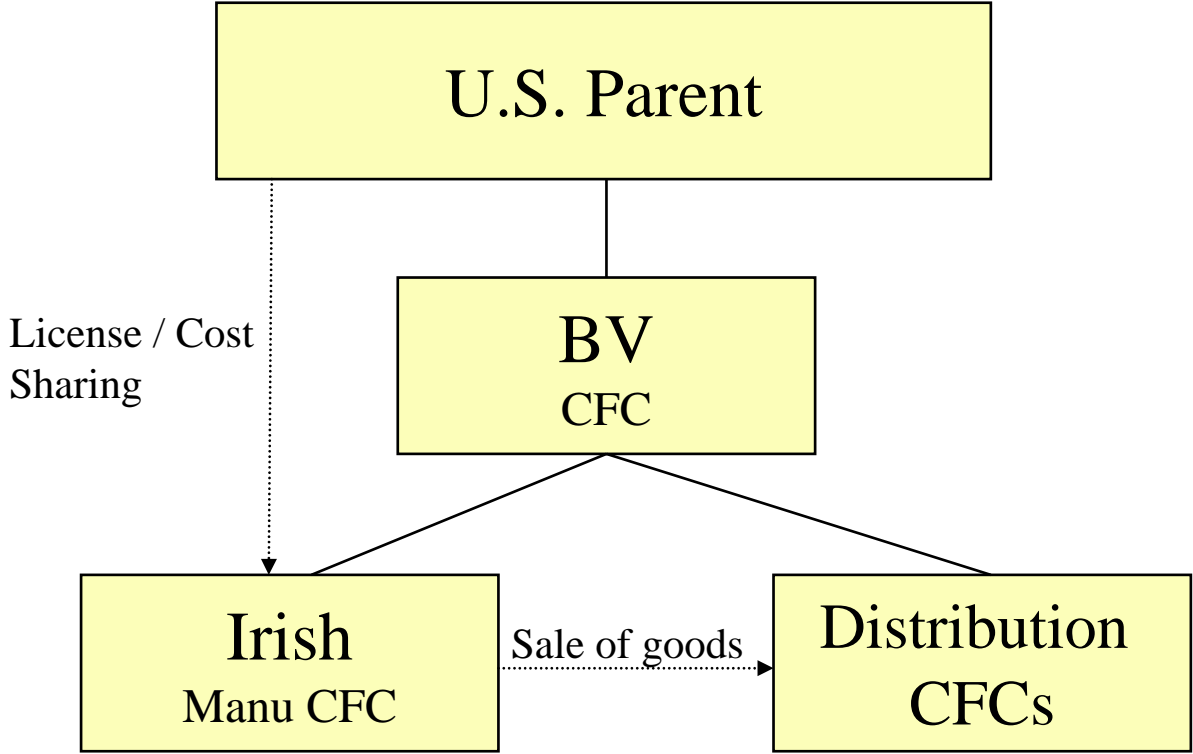
Hybrid Entity Planning Techniques

- Outbound
 - Manufacturing Planning
 - Principal / Supply Chain Planning
 - Finance Planning

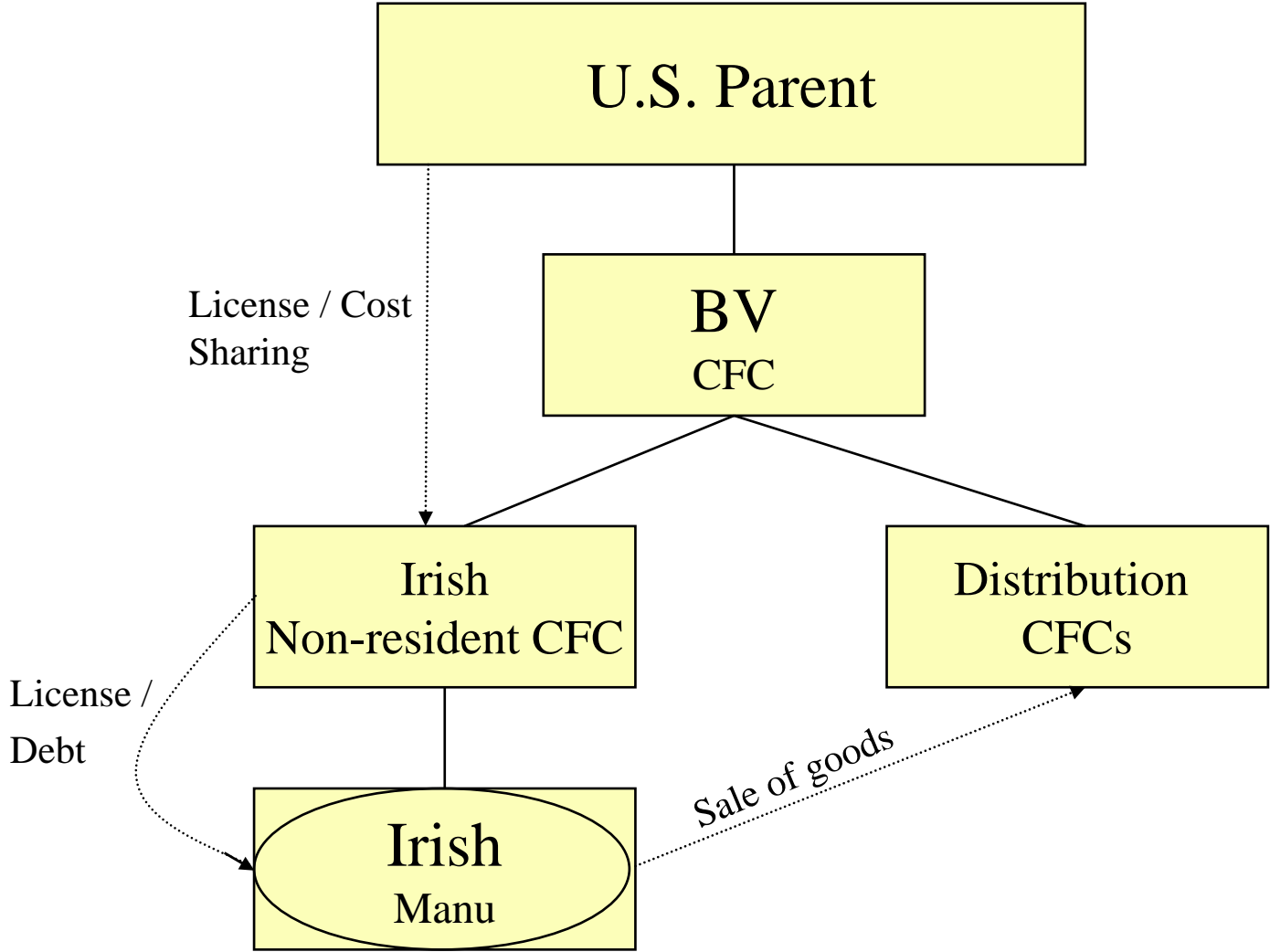
- Inbound
 - Finance Planning

- U.S. as a Tax Haven

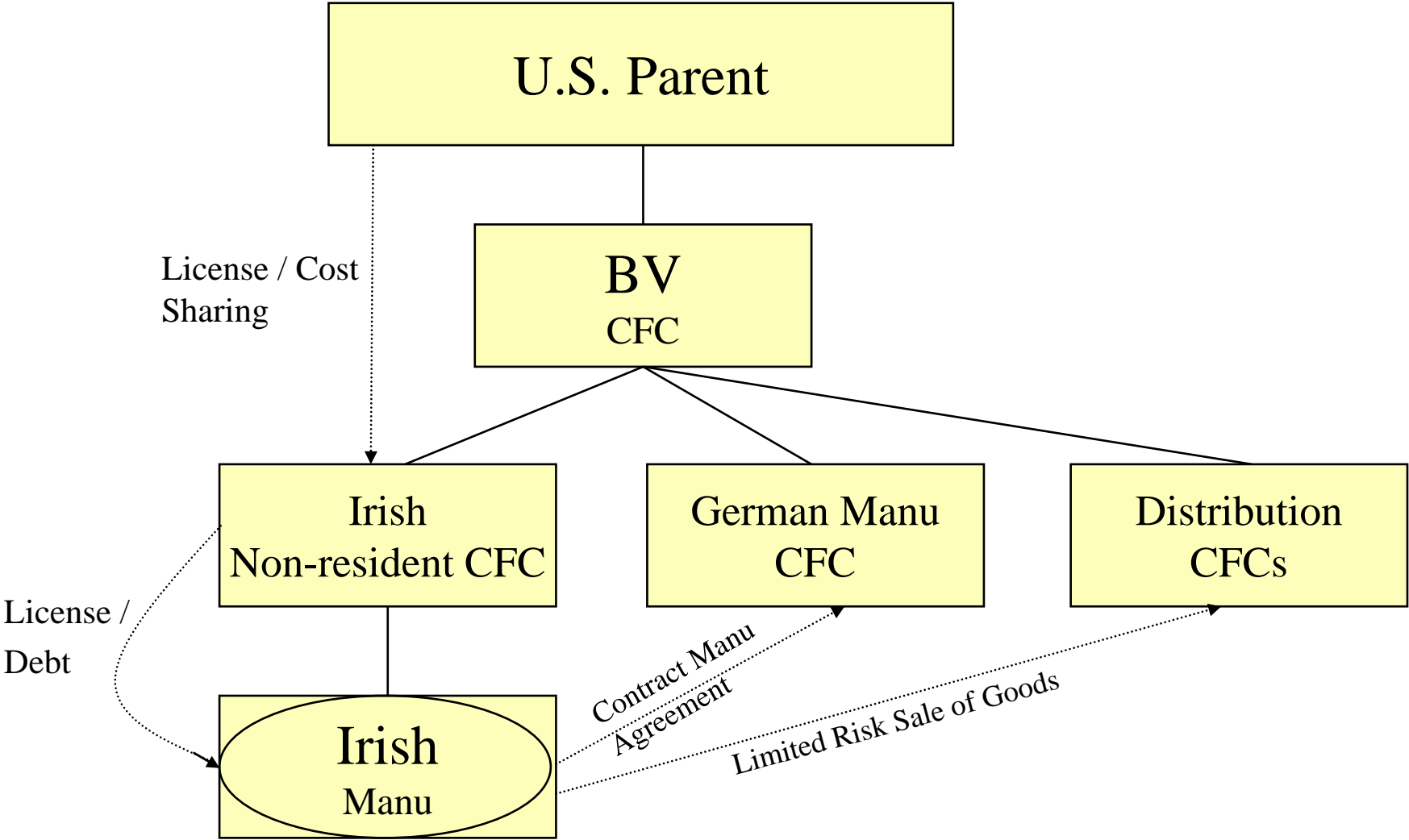
Traditional Irish Manufacturing Planning



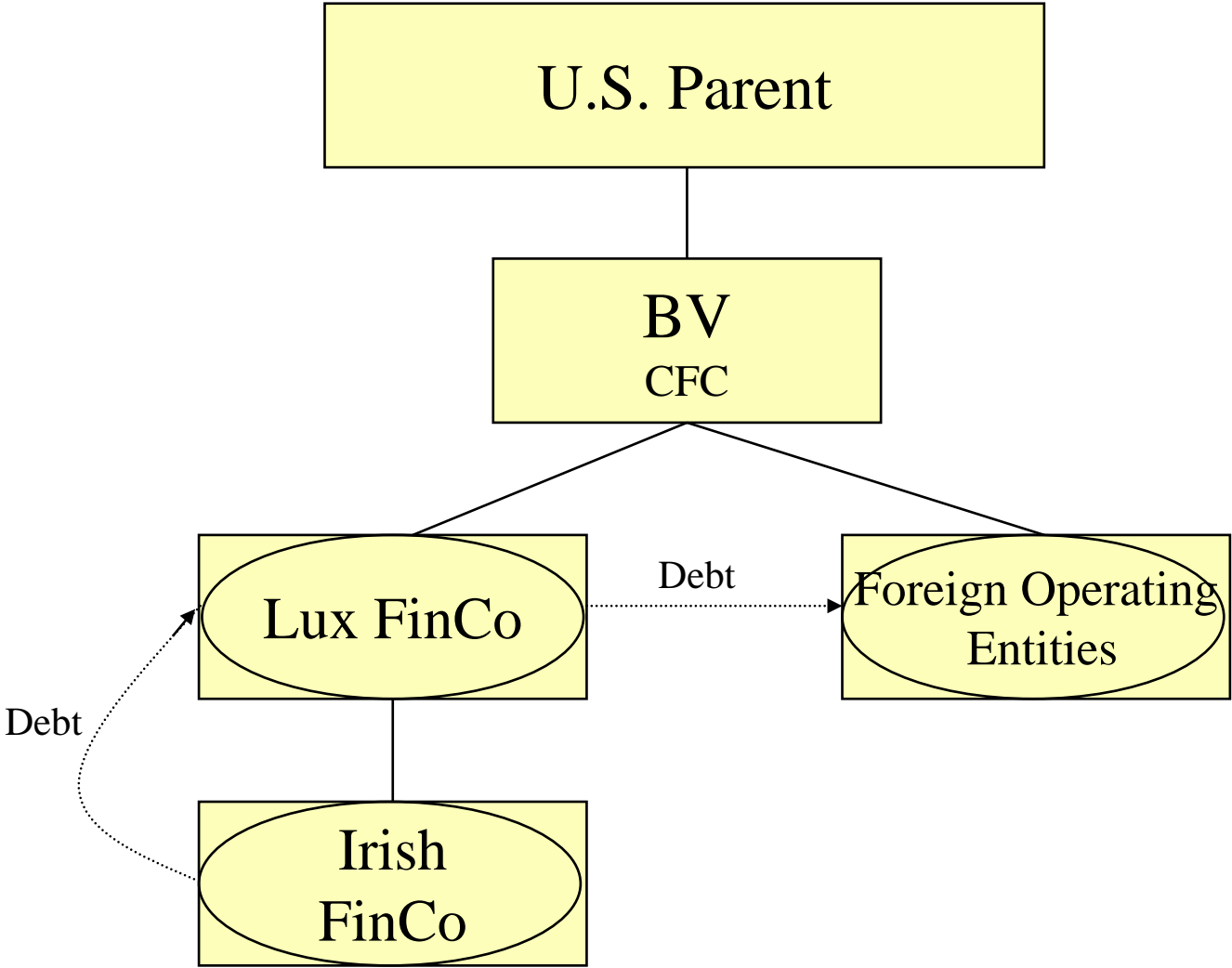
Current Irish Manufacturing Planning



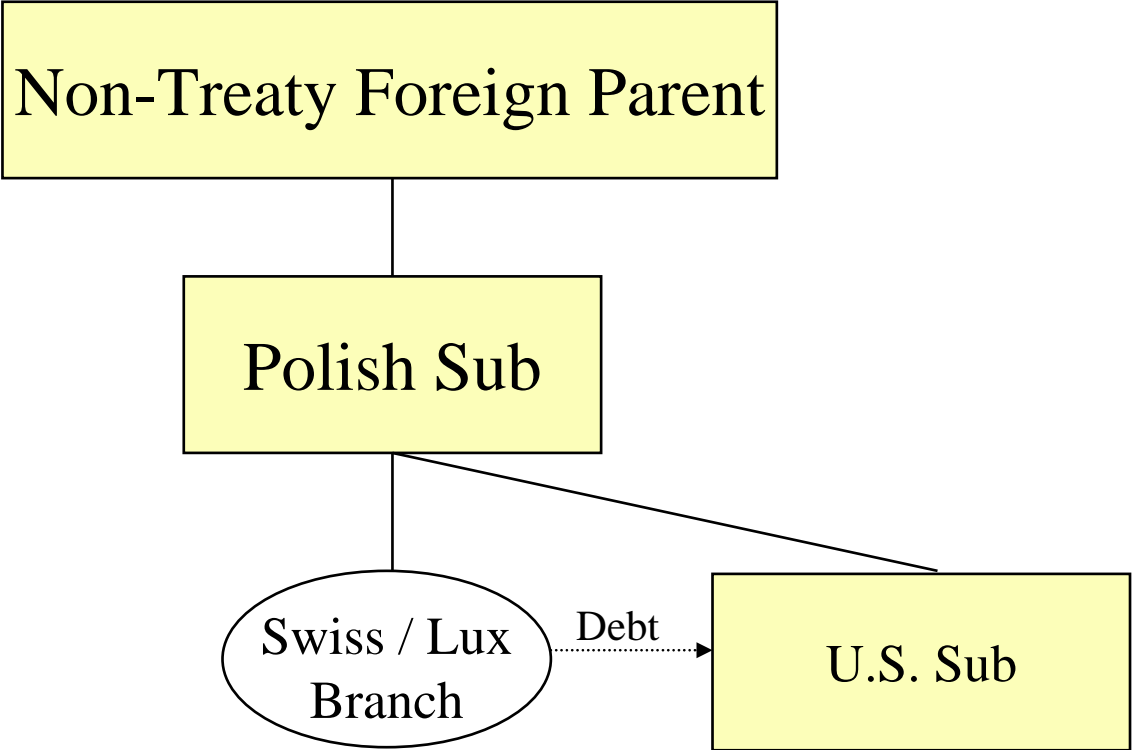
Irish Principal Contract Manufacturing Planning



Luxembourg Finance Planning



Treaty Finance Planning



U.S. as a Tax Haven

