

Tax Reform – Key provisions impacting US Inbounds

	House GOP tax reform 'blueprint' provisions	Impact on US inbounds
C - corporation tax rate	Reduced rate to 20% rate	Consider accelerating deductions now during higher tax rate years and deferring income to later years with lower tax rates.
Interest deduction	Loss of net interest deduction with special rules to be determined for financial services	With interest being one of the largest issues for US inbounds, consideration needs to be given whether the statutory rate reduction will compensate for the loss of the interest deduction.
Border adjusted tax (BAT)	'Destination-based cash-flow' approach, with border adjustments that exempt exports and taxes imports	With a large number of US inbounds being net importers, the BAT will likely increase significantly their US tax liability.
Repatriation "toll tax"	Previously untaxed foreign earnings have a toll tax of 8.75% imposed on cash and cash-equivalents and 3.5% tax rate for non-cash assets paid over 8 years	US inbound companies with "sandwich structures" (F. Parent-US Sub-F. Sub.), will be subject to the repatriation toll tax.
Cost recovery	Full expensing for investments, excluding land	Full expensing of tangible personal property and intangibles may have significant impact, especially around a foreign-headquartered MNC's overall IP strategy, requiring evaluation of whether to on-shore IP and principal functions to the US (e.g., R&D activities).



How Us Tax Reform Proposals Will Affect Private Investment

**United States. Congress. House.
Committee on Ways and Means**



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