SHIN & KIM

International Tax

With the introduction of BEPS and efficient exchange of tax information around the world, tax risk on offshore transactions is also increasing. Tax authorities around the world are aggressively monitoring offshore tax matters and taking a more rigid stance on permanent establishment and transfer pricing issues.

International tax issues generally entail technical and complex issues. Therefore, international tax issues must be dealt by international tax experts who have an abundance of experience and expertise. Our International Tax Team has expertise and experience on a broad range of international tax issues, including transfer pricing and international tax planning and structuring. Our team provides comprehensive legal services by conducting in-depth analysis on tax laws, tax treaties, commercial codes and regulations on foreign currency transactions in designing the global business structure that meets the business objectives of the client while minimizing tax risks. In addition, our team proactively devises strategic plans that allow our clients to manage tax risks through preparation of transfer pricing report and utilization of the APA system. Our International Tax team has a proven track record of successfully representing and defending clients in tax investigations related to international transactions.

Key Services

Shin & Kim's International Tax team provides the following services:

Tax advice relating to international transactions and tax treaties

Comprehensive advice on tax issues in relation to international transactions (including corporate income tax, withholdings, and VAT issues).

Planning and implementation of transfer pricing policy and APA

As Korean tax authorities have strengthened their auditing efforts on multinational companies' transfer pricing practices, it is increasingly important to determine proper transfer pricing methods of not only transactions of tangible goods but also transactions involving intangible goods such as royalty, management advice fees and commissions.

Our International Tax team is comprised of experts including CPAs with prior experience in transfer pricing and former officials of the National Tax Service who conducted transfer pricing investigations. Our experts assist and guide our clients through complicated and sensitive transfer pricing planning matters, analysis of materials necessary for

substantiation of the determination method adopted by the client, preparation of transfer pricing reports and APA (Advancement Pricing Agreement) on transfer pricing.

International tax planning

When a domestic company enters a foreign market or a foreign multinational company enters the domestic market, it is important to devise comprehensive international tax strategies such as choice of entity, type of internal transactions among related entities and transfer pricing method, and tax saving strategies. Our Tax team provides efficient international tax strategies specifically tailored to the needs of the client.

Tax investigation and settlement

Our team effectively handles tax investigation matters that involve permanent establishments and transfer pricing. Our experts have successfully negotiated settlements for our clients.

Experience

- Advising of domestic and foreign corporations on major issues in international transactions and investment such as permanent establishments, beneficial owners and withholding taxes
- Advising of companies in preparation of transfer pricing reports relating to tangible goods imported from an offshore related company and royalties or business consulting fees paid to such related company
- Representation of a subsidiary of a foreign corporation in an audit of its permanent establishment and transfer pricing
- Tax due diligence for a company acquiring a Chinese company and advising on a tax efficient transaction structure
- Advising a company on establishing a holding company in Hong Kong and making a tax efficient in-kind contribution
- Advising of a company on establishing a holding company in Singapore

Key Contacts

Je-Heum Baik
Senior Partner

+82-2-316-4052
jhebaik@shinkim.com

Chang Hee Lee
Senior Advisor

+82-2-316-4164
cheelee@shinkim.com

Maria Chang
Senior Foreign Attorney

+82-2-316-4165

Steve Oh
Senior Foreign Attorney

+82-2-316-7238

mariachang@shinkim.com

soh@shinkim.com

Junseok Yoon
Partner

+82-2-316-7212
jseyoon@shinkim.com

Jin-Wook Lee
Senior CPA

+82-2-316-2880
jwoolee@shinkim.com

Awards and Rankings

- Ranked Band 1 Law Firm for Tax
  Chambers Asia 2026
- M&A Deal of the Year : Acquisition of LINA Life Insurance of Korea,Cigna Korea and LINA Financial Service
  ALB Korea Law Awards 2022
- Best M&A Legal Advisor of the Year
  Money Today Korea IB Awards 2022

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