

Food & Drink Federation Going global - what are the tax considerations?

2nd October 2023

Agenda

Going Global – what are the tax considerations?

Introductions

Corporate tax considerations as you expand overseas

Global Mobility and taxation

Introductions

Introduction to Johnston Carmichael

Largest accountancy firm in Scotland and **Top 20** UK firm

We have **60** Partners and **830** staff across **14** offices

We audit more **Top 100** privately owned companies in Scotland than any other accountancy firm

advise **550** food & drink producers across UK

Have international capability as member firm of  **MOORE**

members of  **fdf** food & drink federation
passionate about food & drink



Introductions

Today's hosts – Amanda Collinson, Jane O'Berg and Stuart Duff



Amanda Collinson

Amanda is an International Tax Director with 18 years' experience, including several years working in-house as a Group Tax Manager.

Her broad experience enables her to provide practical advice to companies of all sizes on the tax risks and opportunities that come with expanding cross-border. In particular, she advises companies on how to structure their international operations and the application of double tax treaties.



Jane O'Berg

Jane is a Tax Director and leads our Global Mobility team.

Jane works with a variety of different sized companies across many industry sectors, helping them identify and manage their tax exposure that may arise from having an international workforce.



Stuart Duff

Stuart is the Transfer Pricing specialist in our International Tax Team.

Stuart brings over a decade of international experience gained in group management of DAX- and MDAX-listed German energy giants as well as from working alongside a wide range of UK clients, including a FTSE-listed beverage group with interests in manufacturing, branding and distribution.



Illustrative example
From Anuga to German Market

Tax considerations of international expansion

From Anuga to German Market



- Your **UK food manufacture and retail business** is going from strength to strength
- Thoughts of further growth lead to the idea of **international expansion**
- **You hire a stand at Anuga** to test the waters at Europe's largest food and drink trade fair
- You are looking forward to the business trip and are **taking your sales team** along. The idea is to show and tell, offering samples and business cards.
- Is there anything to consider from a **tax perspective**?



Tax considerations of international expansion

From Anuga to German Market

- Fresh from your success at Anuga, you have received **customer orders** from the German market.
- One particularly **large customer visits you in the UK** and has a request:
 - *"We would like to offer **your products in our supermarket chain throughout Germany** – both with your branding and as part of our in-house offering."*
 - *"However, we have a policy that we require you to have a dedicated **key account manager for the German market**, to iron out any supply chain issues as fast as possible."*
- This gets you thinking – the client is large enough to justify a key account manager, **is this the way forward?**
 - What should you consider from a **tax perspective?**
 - Do you need a **German company?** What about a **branch** of your UK business?
 - **One of your sales team** springs to mind – what about sending them to **work from Germany?**

Germany

Country in Europe



Germany is a Western European country with a landscape of forests, rivers, mountain ranges and North Sea beaches. It has over 2 millennia of history. Berlin, its capital, is home to art and nightlife scenes, the Brandenburg Gate and many sites relating to WWII. Munich is known for its Oktoberfest and beer halls, including the 16th-century Hofbräuhaus. Frankfurt, with its skyscrapers, houses the European Central Bank. — Google


Capital: Berlin

Chancellor: Olaf Scholz

Dialing code: +49

Population: 83.2 million (2021) World Bank



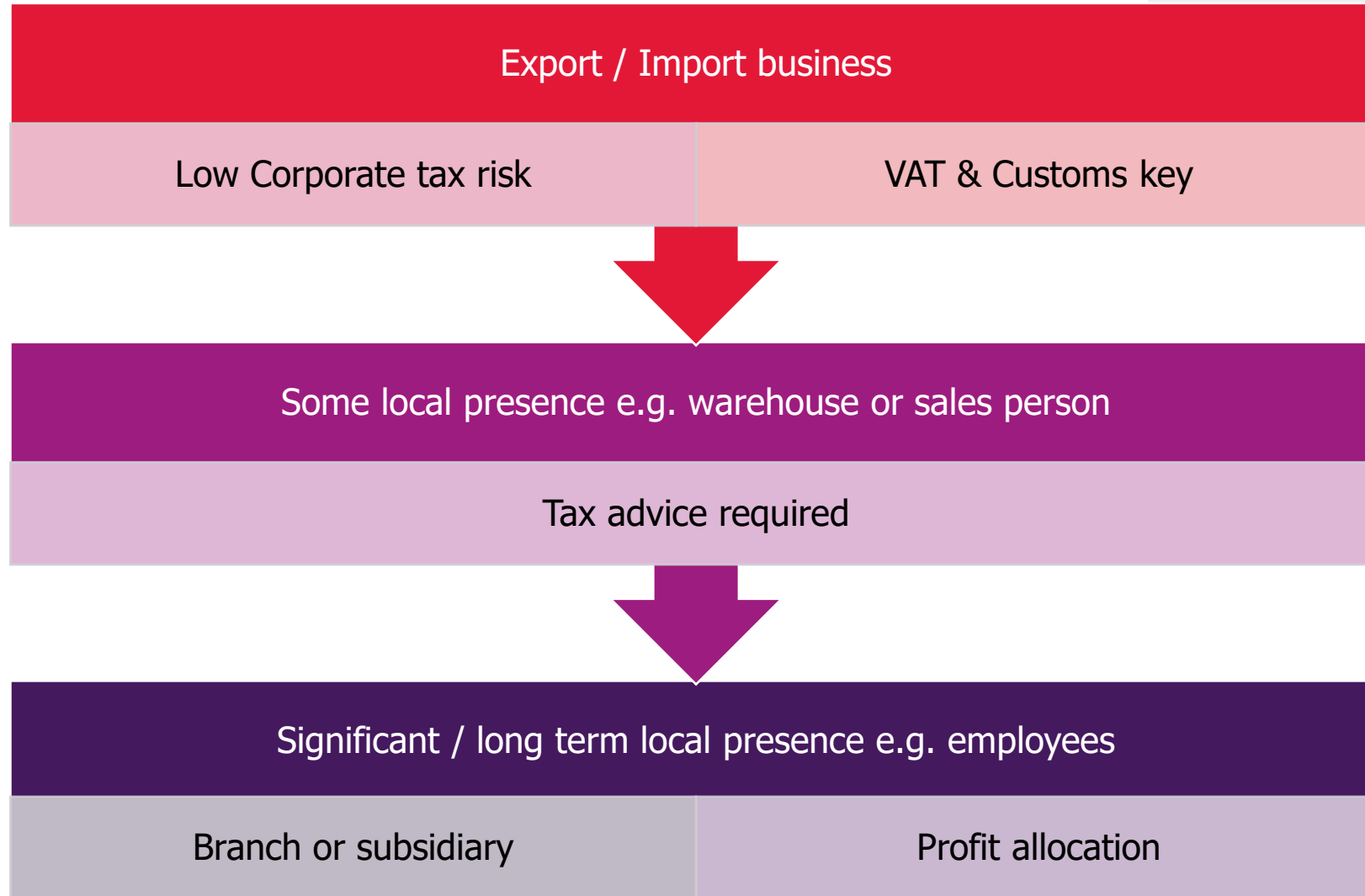
The background features a dark blue field on the left and a pattern of overlapping, semi-transparent geometric shapes in various shades of blue on the right. These shapes include triangles and quadrilaterals, creating a dynamic, abstract composition.

International Tax and Global Mobility

When to talk tax – how we can help

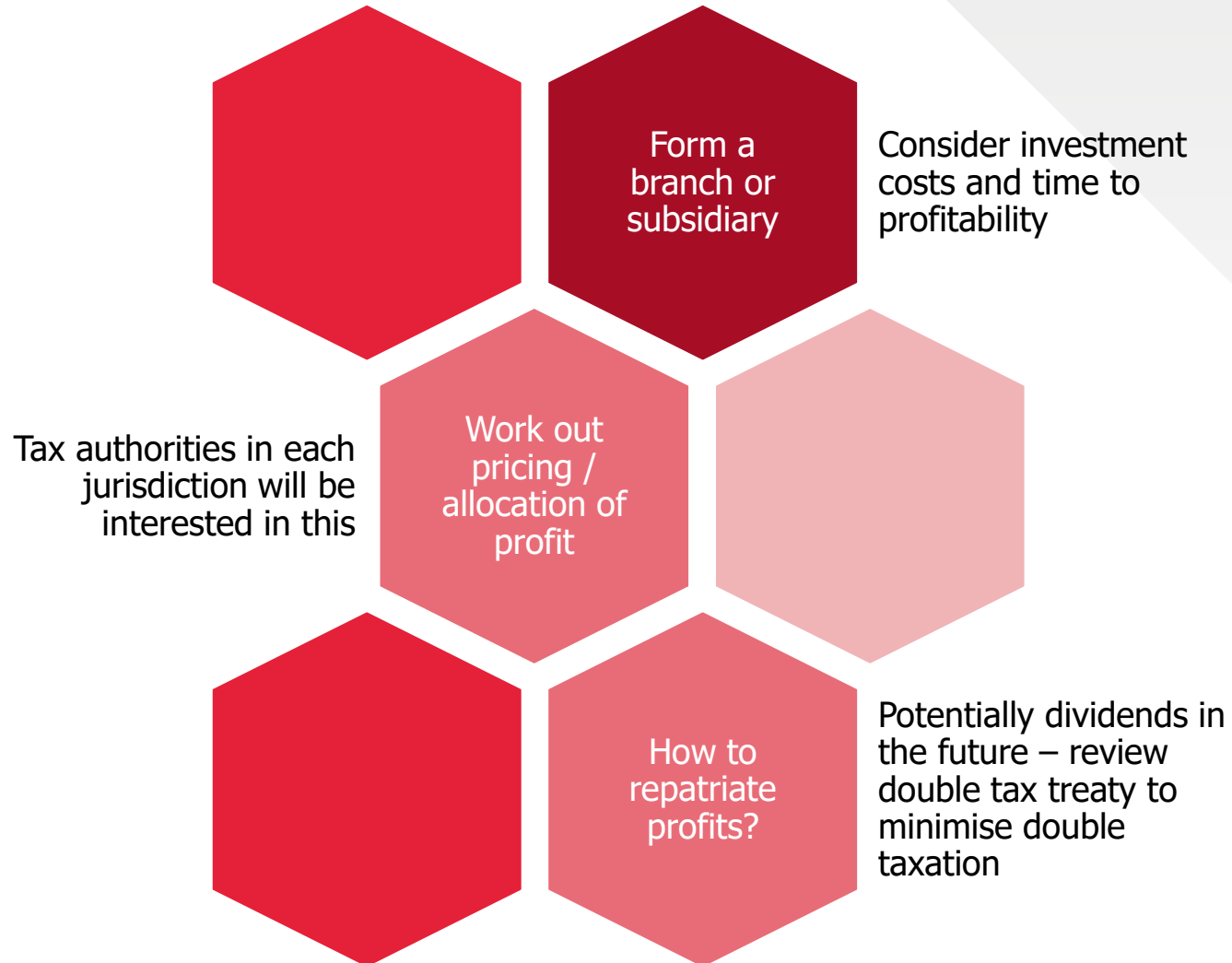
Stages of expansion

Tax considerations



Stages of expansion

Tax considerations



Global mobility

Hot topics and trends

International remote workers

Global business visitors

Brexit immigration changes

Non-resident directors

EU Posted Worker Directive

Tax & Immigration Authorities communicating more

Please keep in touch

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