##Instruction:

Transform and tag the Text and the tables from the attached Tariffs Guide Word.docx file using Tariffs Guide_On_BTAX.pdf as the reference source. Use the completed text provided below as the definitive guide for structure and tagging conventions. Ensure the output file does not include any ID attributes and strictly follows the tag names and hierarchical structure used in the completed text.

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<name>Strategies and Implications</name>

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<name>Authors</name>

<para id="f580530e2d4046e29fd2e9c7ae378a18">David Zaiken<line.break/>Tax Director
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<para id="14b8e4803bb142e9be3617de58e36624"> LaVonne Rosenberg, CPA
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<name>Introduction</name>

<para id="932de4663a4d4dc9a6834b86f56246fc">The interplay between the new U.S. tariffs, federal and state taxes, and tax reform, and strategic planning for potential outcomes, has become a core focus area for any U.S. business that imports tangible property into the U.S. Layered on top of this is the need for these businesses to plan for the outcome of U.S. transfer pricing rules as they impact U.S. tax profitability for related parties. </para>

<para id="31be6dc3448845989613ed7799875cdc">Numerous increases to tariffs have been imposed, while others are on hold until final trade deals are implemented and other paused tariffs become finalized, potentially after July 9, 2025. Moreover, the U.S. House of Representatives passed the One Big Beautiful Tax Bill, which is presently in the U.S. Senate under review. The administration hopes to sign the bill in early July, which means many revisions could be made before passage.

<para id="052411f38f4148b2a3f152798372d02f">While these issues are, and have been, prevalent throughout 2025, businesses that import tangible property are now directly impacted by tariffs, and should begin active strategic planning for both their tariffs and U.S. federal and state tax posture to achieve future efficiency. Despite the uncertainty, some increased tariffs are likely to continue, as well as federal and state tax changes, regardless of a new tax bill being enacted. Enough information is available to commence tariff and integrated tax planning, and businesses should implement strategic thinking over the next few months.

<para id="48e24df857c44840baf16bcc77029e5e">This Guide's focus is on identifying strategies for addressing tariffs, and their potential federal and state tax implications. In doing so, businesses can begin to navigate how to best approach an integrated plan for these outcomes. While there is near certainty that changes to both tariffs and tax rules will be made before this Guide is published, its approach will continue to be useful in identifying the issues, and directing businesses to a coordinated tax/tariff approach for the near future.

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<name>Current U.S. Tariff Rates</name>

<para id="adf7670bb30d432bb70364aed21e1537">Current U.S. tariff rates (in effect and delayed) are contained in Table 1 below. Any tariff rate referred to in this Guide may or may not be the actual final amount charged to U.S. importers since they will be updated over the next few months, but it illustrates the general direction and trend. It should also be noted that numerous semiconductors and pharmaceutical drugs are exempt.

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as of June 26, 2025</emph> <superior>1</superior> 
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China and Hong Kong
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30% until around August 12, 2025, could
be increased to 145% after July
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Most countries under the baseline
reciprocal tariff (individual country reciprocal tariffs are delayed until July 9, 2025)
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10% 
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Most automobiles
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25%
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Most automobile parts
</entry>
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25%
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Most steel and aluminum
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50%
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Certain goods from Canada and
Mexico
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25%
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<superior>1</superior>For the latest
information on the response to the new U.S. tariffs, see <cite.url
ref="https://www.bloomberglaw.com/product/tax/document/XBSL06BC000000">Roadma
p: International Response to the New United States Tariffs</cite.url>.
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<para id="ef26e776184045dd9ed1134fee918f0f">These tariffs are currently being
collected as goods enter the U.S. and have already raised significant revenue over the last
few months. Monthly tariff revenue has more than doubled since January 2025. In January,
$7.4 billion in tariff revenue came into the U.S.; by April 2025, this had increased to over
$16 billion.</para>
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<name>Tariff Strategies</name>
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<name>Core Areas of Current Tariff Regime Compliance to Be Reviewed </name>

<para id="855ed753fdcd4d02af8adf2dea2ecb14">Under the current and evolving tariff regime, there are several core areas to review and monitor to ensure that the importer is compliant and considering the relevant aspects. In doing so, businesses can establish baseline reporting and compliance to prepare for the changes coming their way.

<para id="20968a80a2204a9f8d28260899521fdd">Ensuring that the good is reported with the actual tariff code is critical. There have been many instances of miscoding that could lead to inappropriate higher tariffs<emph>. </emph>In particular, exempt goods should be reviewed to ensure proper coding. For example, auto parts have numerous exempt subcategories. Additionally, for Canada and Mexico, some aluminum and steel goods may be exempt under United States-Mexico-Canada Agreement (USMCA) rules. Businesses should obtain a copy of their ACE report from the customs authorities to see what codes and tariff rates have been reported.

<para id="92f87de50f5243faa615d14c05925bd6">Other areas include conducting a detailed review of the tariff rate by country to avoid miscalculating the duty rate, while also reviewing the reporting of the country of origin, U.S. value added, and the current impact on transfer pricing.

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<name>Monitoring Change and Impact on Cost of the New Tariffs</name>

<para id="db034f05bba64c6987b7501483895b2a">New tariff announcements and/or Executive Orders occur almost weekly (sometimes daily), causing a significant degree of uncertainty. Given that tariff rates are likely to shift, businesses should plan for increased costs, if applicable, to ascertain impact. Many corporations are already facing negative impacts to their earnings (either through additional costs and/or consumer pullbacks) because of tariffs. It is critical to monitor the countries of supply and changes in tariff rates (i.e., E.U., U.K., Asia, Latin America, and others). As trade deals become finalized and implemented this can be reliably calculated. It is also important to assess the global impact of the tariffs to determine its impact on margin. This is core to proactive planning.

<para id="0122dcd56202471983107926a88048e8">With constant changes in tariff policy being an integral component of President Trump's customs communication, Table 1 should be taken as a guideline and not as an exact set of rates. For example, on June 3, 2025, President Trump, by Executive Order, increased "Section 232 Tariffs on Steel and Aluminumâ€② from 25% to 50%. Further, President Trump ordered two separate 90-day pauses on higher rates applicable to China and other countries to allow for negotiations. The end of the first 90-day tariff pause is quickly approaching (at or around August 12, 2025 for China and July 9, 2025 for the other countries), although both could be extended.

<para id="03fd974b63f14f32baf99e932c80e305">Despite the announcement, many questions on actual parameters and the staying power of the "dealâ€2 remain. China tariffs have been as high as 145%, which effectively stopped trade with China before they were paused. Additionally, China and Hong Kong lost de minimis eligibility, which had allowed an exemption from tariffs for certain goods under \$800 in value.

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<name>Strategies to Consider for Tariff Planning</name>

<para id="699993242b0944ea985224fd06d98778">Various areas of strategic thinking should be assessed to arrive at a supply chain process and procurement planning that effectively address increased tariffs. These approaches should be reviewed as a whole since they are not mutually exclusive.

<para id="8d2fb4afdc724c37af185dbaf8f07b2b">Many of these strategies can be combined and should all be modeled out to ascertain the financial cost and benefit to the specific business. For example, combining components importing and Free Trade Zones strategies could yield a doubling of the benefit. Negotiations as to who is the importer and who bears the economic cost also is an additional strategy.

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<name>Identity of the importer</name>

<para id="bea17058de644817b896e0699fb38c8d">Businesses should review whether the importer can be changed to the supplier by changing the incoterms and having them pay the duty. They can also consider putting in place a legal or sales/supply contract that

makes it clear as to who economically bears the tariff. This is a business negotiation. Similarly, existing legal contracts should be reviewed and updated, and adjustments made as to both the price and the importer. </para>

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<name>Price increases for customers</name>

<para id="30592ebcce08483fa844cd683d69eed7">Discussions with customers are needed to determine whether pricing can be adjusted to pass the burden of increased tariffs on to the customers. This should also entail updating or executing sales contracts to account for such changes. Businesses should update and/or prepare a sales contract with the customer which identifies the pricing and customs duty and how it is shared.
Alternatively, consideration should be given to sending out a letter to customers indicating price increases and the reason.

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<name>Tariff code classifications</name>

<para id="eccca66a6d854185a74adf3ea7d33890">Businesses should also update classification of tariff codes to make sure they are correct and subject to the correct tariff rate. This can involve: a review of tariff codes for more accurate compliance, which can lead to customs savings; a review of exempt goods, as well as particular classifications related to Canada and Mexico; for U.S. made products that are sent offshore, accounting for foreign value added in customs declarations; and, a review of classifications under updated customs and tariff guidance and Executive Orders/fact sheets to ensure compliance with exempt goods. For example, classification as auto parts or steel and aluminum may depend on specific facts. Notably, this is a detailed review of product-specific tariffs as opposed to reciprocal tariffs, which are levied on a country basis.

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<name>Alternative supplier(s) from different country(ies) of origin</name>

<para id="34804b3e967a42d9b02d910509a3f82b">Businesses should begin negotiations with suppliers to shift the country of origin and manufacturing to a different country to obtain a lower tariff rate. This will be of particular interest for goods manufactured in China. It would be desirable to have the supplier become the importer and let them take the tariff risk. This would affect the pricing of goods purchased. Notably, country of origin is where substantial transformation is performed and not just packaging or light assembly.

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<name>Transfer pricing for related parties</name>

<para id="69c1191036e646a6b9ebc0641a8453ad">From a transfer pricing point of view, if the U.S. company is importing dutiable goods from a manufacturing subsidiary and it incurs the tariff, this could affect the intercompany transfer price to keep the U.S. at an arms length distribution profit. As such, transfer pricing should be reviewed to possibly adjust for increased customs duty if the U.S. company is the importer for related parties. In this case the price of the imported good might be reduced. Changing the importer should also be considered, as well as purchasing from a U.S. supplier. Proper documentation is critical to sustain these changes in transfer pricing. </par>

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<name>Cost of indirect tariff price increases</name>

<para id="2ebb89c7aff4488490f71e48b08e2564">Businesses should obtain and evaluate evidence of cost increases of U.S. suppliers who have indicated that they are passing on price increases due to tariffs to verify the increase in price and then negotiate the difference. This would entail communication and review of a vendor's costs to gain confidence that the tariffs have actually increased prices. It would then require pricing business decisions. /para>

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<bna.id bna.id="7">2.3.7./bna.id>

<name>Alternative pricing for both related and unrelated parties</name>

<para id="01f96b15d0a14a2380595a9d5b82e319">Businesses should consider changing the price of goods to include license and service fees to evaluate the impact on tariffs. This is a very technical area and involves deeper understanding and examination of tariff rules on alternative pricing structures. This could also have a transfer pricing impact for related parties. It may be possible to structure the import of the goods on a cost plus a manufacturing markup and have other costs charged as service fees (it is important to document that the services are actually performed). Inclusion of license fees needs to be evaluated under tariff rules that could include some license fees as part of the cost of a product (trademark versus technology).

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<bna.id bna.id="8">2.3.8./bna.id>

<name>Changing the supply chain</name>

<para id="ac6fa6cc423c447d866fd8795c347ac8">Businesses can consider changing the supply chain so that the U.S. company is purchasing components and subcomponents instead of finished goods, and assembling or manufacturing domestically. The impact would be a decrease in the price of the goods since parts and components are being imported as opposed to a finished good. This could lead to lower pricing of the components, and lower tariffs if the pricing is adjusted. Notably, there may be state income tax incentives for moving this type of activity into the U.S. This strategy affects also transfer pricing for related parties, and core business decisions and supply chain arrangements.

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<bna.id bna.id="9">2.3.9./bna.id>

<name>Free Trade Zones</name>

<para id="10e5c8a322954f02b118553bb878fcf0">Although Free Trade Zones are becoming more restrictive and may not apply to reciprocal tariffs, importing a good through a Free Trade Zone delays the imposition of a tariff until the good has left the Free Trade Zone. This would entail approaching the customs authorities or others to possibly obtain

rulings and clearances for use of the Free Trade Zone or establishing one. Routing goods through a Free Trade Zone could lead to a reduction of cash flow outlay since tariffs would not apply until the goods leave the Free Trade Zone.

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<content.group id="9607f60e227a4f91bf9af0b192adee3e">

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<name>First Sale Rule</name>

<para id="2efea9bd025a42a69e27776a5780f0c5">Under the First Sale Rule, if a good is purchased and, without further processing, is resold then it may be possible to reduce the tariff value to the price of the good for the seller to the U.S. An example would be if the U.S. importer imports a finished good that the supplier is simply reselling. Under the First Sale rule, the duty value is the cost to the supplier and not the sales price. This is a detailed process and businesses would need to obtain approval, but it could yield significant benefits. </para>

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<name>Duty Drawback Rule</name>

<para id="d9739031b21b42628bf877451bc70cd9">In certain situations, goods brought into the U.S. that are then exported may be allowed a refund or duty drawback since they are exported and therefore not for ultimate use in the U.S. These rules may be becoming more restrictive but could yield zero duty on export goods.

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<name>Nearshoring of goods</name>

<para id="218813dbbe354b859165f51b4e923b76">If Free Trade Zones or the Duty Drawback are not beneficial, businesses should consider locating their warehouses to nearby countries, and then importing to the U.S. as needed. This would delay the tariff until the good is imported. This has numerous business considerations, which would have to be

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investigated to determine how beneficial this approach would be to a given business. </para>
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<para id="e97673c13e2f468a9d7888814258afcb">Major tax legislation that affects tariffs is likely in 2025, since most provisions of the TCJA expire, with the notable exception of the 21% corporate tax rate. The U.S. House of Representatives passed the "One Big Beautiful Bill Act'' on May 22, 2025, and on June 16, 2025, the Senate Finance Committee presented the Senate version of the House bill. It will almost certainly change in the U.S. Senate as the Senate votes on its own version of the bill.

<name>U.S. Federal Tax Legislation Business Tax Changes</name>

<para id="3f3a0f0d123546bfab0013cff44e0867">The Senate Finance Committee and
House bills are substantially similar and contain three core business changes:<list.item>1)
domestic research and development would be fully deductible;<footnote
id="5615a4acb3724f699092e1b4e03a1e1e"><footnote.marker><superior>2</superior></footnote.marker><footnote.text><para id="8ccb4b9941174ac29ba6f6a011106d43">For
further information, see <cite.url</pre>

ref="https://go.bloombergtax.com/product/tax/document/spa/25322277928">T.M. 556, Research and Development

Expenditures</cite.url>.</para></footnote.text></footnote></list.item>100% first-year depreciation would be allowed for plant, property, and equipment placed in service;<footnote

id="aa80f274557e4a35ab031ab78c9d016c"><footnote.marker><superior>3</superior></footnote.marker><footnote.text><para id="5f03311fcb6d4c47b2c3773f90fdf35e">For further information, see <cite.url

ref="https://go.bloombergtax.com/product/tax/document/spa/6358106152">T.M. 532, First-Year Expensing and Additional

Depreciation</cite.url>.</para></footnote.text></footnote> and,</list.item>st.item><3) interest expense would be increased by increasing the limit to 30% of EBITDA.</br>
id="c071586c4cce47888b5c39b12fec4e45"><footnote.marker><superior>4</superior></footnote.marker><footnote.text><para id="6747a954909d4cc78bee2ea7a148141b">For further information, see <cite.url

ref="https://go.bloombergtax.com/product/tax/document/spa/28208772648">T.M. 536, Interest Expense

Deductions</cite.url>.</para></footnote.text></footnote></list.item></para>

<para id="78062f75ceca433ea3c910b73e62d330">Notably, Senate Republicans are advocating for business provisions to be permanent, as opposed to the House, which made them mostly temporary. Without legislation, pass-through deductions would be eliminated and individual tax rates would substantially increase on pass through income. Additionally, most of the energy credits currently available would be repealed.
footnote
id="651a5a62ccbe409582ded4487b220696"><footnote.marker><superior>5</superior>
footnote.marker><footnote.text><para id="e3c4405fbc524cd89681054fbfef3f4e">For further information, see <cite.url</p>

ref="https://go.bloombergtax.com/product/tax/document/spa/27716428840">T.M. 512, Tax Incentives for Production and Conservation of Energy and Natural Resources</cite.url>.</para></footnote.text></footnote></para>

<para id="d8d535d2505e4764a38e40abebb165f7">Surprisingly, to some, the House bill made no mention of a 15% domestic corporate rate that President Trump has advocated for, and the qualified business income deduction was increased from 20% to 23%.

id="6571bb31978348a5a41279794a02dd83"><footnote.marker><superior>6</superior></footnote.marker><footnote.text><para id="66b16a2148c144abb5a73c8d4236dcb5">For further information, see <cite.url

ref="https://go.bloombergtax.com/product/tax/document/spa/24211237416">T.M. 537, Qualified Business Deduction: Section

199A</cite.url>.</para></footnote.text></footnote></para>

<para id="3550092f40774e6cba9840c1bf6e8f84">These increased deductions under the proposed legislation blend well with tariff planning, and the results need to be modeled out. A complete model should be prepared that includes both the increased or decreased tariff, and income tax aspects (including the increased expenses). This then allows management to understand the financial impact of these changes and plan accordingly.

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<name>U.S. State Taxes and Tariffs</name>

<para id="7c88168a09414c20a48364a51dabf147">Tariffs imposed at the federal level also can have significant state and local tax (SALT) impacts<footnote id="d042403cf73e4397b1babac1a43b5c78"><footnote.marker><superior>7</superior></footnote.marker><footnote.text><para id="61a7d67481ed4e738638603d3d74d6b8"> For further information on the state-tax related issues referenced below see the State Tax Navigator links at the end of this Guide.</para></footnote.text></footnote>. Businesses should include SALT considerations in their tariff analysis and proactively identify alternatives to minimize these impacts.

<para id="297f155e71f4475c8820bb952e1322e5">These issues primarily relate
to:<list.item>1) the impact of tariffs on sales/use taxes and ad valorem taxes,
and;</list.item><list.item>2) SALT considerations for businesses onshoring their
manufacturing operations to the U.S.</list.item></para>

<para id="ad2693a0c5ff4e48860df6413c630291">As tariffs increase the price of imported goods, they may also increase the sales tax liability, making imported goods even more expensive for U.S. businesses and consumers. Whether, and to what extent, tariffs will impact the sales tax liability generally will depend on how the transaction is structured, who pays the tariff to whom, and how the tariffs are invoiced. Tariffs paid directly by the purchaser, as the importer of record, generally will not be subject to sales tax because the payment is made directly to the U.S. Customs and Border Protection (CBP) solely for the tariff and not to the seller for the purchase of the product. However, if the seller increases the price of its products to cover the tariff costs, that price increase will increase the sales tax due on the subsequent sale transaction, since sales tax is imposed on the sales price of the product.

<para id="53acc42b61b648a2a9088c9d47bbdef4">Tariffs paid by the seller, as the importer of record, and passed on its customers as an invoice line-item (also called "tariff feesâ€②) likely will be subject to sales tax as part of the sales price of taxable items. States generally define the "sales priceâ€② for sales tax purposes as the total amount of consideration for which tangible personal property or taxable services are sold, without deduction for fees or other costs or charges incidental to the sale.

<para id="bfc5e0886d19457d830338b58da0824c">The treatment, ultimately, will depend on each specific state's law. Some states may choose to exclude tariffs from the tax base if they are shown as a separate invoice line-item. To-date, the few states that have

issued guidance on this have held that tariffs invoiced by a seller to a purchaser are included in the taxable sales price of the items being sold, regardless of whether the tariff is shown as a separate line-item on the invoice. California, New Jersey, and Washington have issued guidance confirming this. If the invoice includes both tariff and non-tariff items or both taxable and nontaxable items, businesses need to ensure that they allocate the correct amount of tariff to each item with different tariff rates. Businesses will need to proactively review and adapt their sales tax systems and processes to correctly apply sales tax to tariff fees charged on customer invoices.

<para id="4a19bbcbff3847f592334e1843e9c0b1">Use tax on purchases from foreign suppliers also should be considered. Businesses are required to accrue and remit use tax on taxable purchases for which sales tax was not charged. Purchases from foreign suppliers often fall into this category. For accounting purposes, tariffs may be capitalized as part of the cost of the asset. Businesses will need to carefully examine these purchases to determine whether the tariff should or should not be included in the tax base for use tax purposes. Failure to do so may result in significant overpayment of use tax on these types of purchases.

<para id="d3dc0366850145bab720e4d37f597d36">Business personal property taxes
generally are imposed on the value of a business' fixed assets located in the taxing
jurisdiction. Some states also tax the value of inventory./para>

<para id="43b5a4a01c7c4a2cbe1e51faef5d132f">Most states use some type of cost-based valuation process to determine the taxable value of fixed assets, and one or more financial accounting valuation methods for inventory. Therefore, an increased cost for these assets may result in an increased valuation, and hence a higher property tax burden. Businesses should examine their states' valuation procedures to determine whether tariff costs can be excluded from the property tax values of these assets. Also, potential Freeport exemptions should be considered if inventory will be stored only temporarily in the state.

<para id="0d51dc5901974d85b3890b0dcf8356be">Finally, ad valorem (property taxes) are
another area where tariffs can impact tax liability.

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<content.group id="48ceebe6322148d3bf891f6c118ac005">

<bna.id bna.id="3">3.3./

<name>State Impacts of on-shoring Manufacturing Operations to the U.S.</name>

<para id="910703718e6e451da864a2d879a344fa">State tax can be a cost or a benefit when making tariff strategic decisions, and needs to be modeled out and monitored. Businesses deciding whether to relocate manufacturing operations to the U.S. should consider the many SALT issues that could significantly impact their bottom line. Core considerations include:

<content.group id="4f8d586dc0194915a1bddacb6853459d">

<bna.id bna.id="1">3.3.1./bna.id>

<name>Most beneficial entity and structure</name>

<para id="8418a784e55b479f845cf980859535ae">When forming a U.S. business entity to conduct operations in the U.S., it is important to consider state tax treatment of each type of entity. Most states will deem an investment in a passthrough entity (partnership or Scorporation) to create "flow-through nexusâ€② for its owners. Since a C-corporation does not create nexus for its owners, this entity type often is preferable to a passthrough entity./para>

<para id="e71614c4ccee4394b540ce361b1ef71b">State of incorporation may also have a significant impact on overall tax liability. For example, Delaware is a popular state for incorporation because of its business-friendly legal environment. However, Delaware's franchise tax liability (which is imposed only on entities formed or incorporated in the state) can become quite significant if careful attention is not paid to how the entity is capitalized./para>

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<name>Location of the manufacturing operation</name>

<para id="2b9d75ea69d949ebbcf8b7cca3d31eaa">State and local taxes are a significant aspect of location selection and should not be overlooked when determining where the new U.S. manufacturing operation should be located. Businesses should consider the overall state tax climate, including tax rates, types of taxes imposed, and taxing levels (state, local and sub-local). </para>

<para id="fd133d77b8d54b82a0a31b2e94770860">Property taxes can be a significant cost for capital-intensive businesses like manufacturers. Businesses should assess the property tax rates and valuation procedures at the state level.

<para id="bbcda11a9bef4865855f9dcf57a19d01">Further, as states continue to aggressively compete for capital investment and manufacturing jobs, state and local tax incentives and credits have become a key element of the location selection process. Businesses should consider both statutory and negotiated incentives. Statutory incentives often include tax credits for investment and hiring, industry-specific credits, targeted credits (e.g., port usage, historic property rehabilitation), research and development (R&D) credits, special zones (e.g., enterprise zones), sales tax manufacturing exemptions, and property tax Fee-in-Lieu-of-Tax (FILOT) agreements. Negotiated incentives also should be considered and pursued <emph>before</emph> finalizing a location decision because the state and/or local economic development board generally is required to demonstrate that the incentives being proposed would impact the business' decision to choose that location.

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<name>State where tax returns are filed</name>

<para id="a9f0a787a4814157bfb03b7d837bc1dd">Nexus (a.k.a. filing requirement) is one of the most fundamental (and most highly litigated) concepts in state taxation. Foreign businesses often find the U.S. state tax nexus rules, and the multiple levels at which U.S. taxes can be imposed, complex and confusing. State tax nexus can be triggered by either physical activities or economic activities. Even if the new U.S. entity confines its physical facilities to only one state, the level of its sales to customers in other states can trigger nexus, as can the manner in which it markets its products, engages with customers, and ships its products. Once nexus is triggered, the business may be subject to a patchwork of income, franchise, sales/use, gross receipts, and other types of taxes at both the state and local level. It is advisable to conduct an initial nexus analysis ahead of beginning U.S. business operations, and a nexus review annually thereafter to avoid being surprised by costly state tax filing obligations and tax liabilities.

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<bna.id bna.id="4">3.3.4./bna.id>

<name>Products subject to sales/use taxes</name>

<para id="c93898a8fdca4bd6ac78d9775f5995bb">Rules regarding taxability and exemptions vary by state. It is important to determine the taxability of each product or service in each state where the entity has nexus. It also is important to understand how the product will be sold and distributed to determine who is responsible for paying the sales tax and what exemption certificates must be obtained or provided to claim applicable exemptions.

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<bna.id bna.id="4">3.4./bna.id>

<name>State Tax Navigator Links </name>

<para id="709b071a70414e36bcf7df4fcc996cbd"><emph face="b">Sales & amp; Use Tax
Navigator Charts</emph> list.item>• < cite.url</pre>

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10071/b91bd0459a46f84e2b 09fe3bd16b67ba">Sales Tax Base</cite.url></list.item><list.item>• <cite.url ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10071/5d2382ef5829d13a03 663d3ab80c2151">Use Tax Base</cite.url></list.item><list.item>• <cite.url ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10071/89454df0b4dbc8f6aa 653309951171aa">Local Sales and Use Tax Base</cite.url></list.item><list.item><list.item>倢 <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10071/701c7c8e14f84959ab 9c9d1a0e052aa3">Tax Base: Federal Excise Taxes and

Fees</cite.url></list.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/charts/state/701c7c8e14f84959ab9c9d1a0e052aa3/edit">Nexus, State and Local Interpretation: Standard for Substantial Nexus</cite.url></list.item></para>

<para id="2cae352374964ee782c92d31b5e2fd81"><emph face="b">Property Tax
Navigator Charts</emph><list.item>• <cite.url</pre>

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10090/503531d9f5513776c8 5a19fc2e06be31">Valuation, Assessment and Equalization: Tax

Rates</cite.url></list.item><list.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10090/f4945ba3ea3e65d223bcbc0efb3034f4">Business, Commercial, and Industrial

Property</cite.url></list.item><list.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10090/75fbd668ff825944d24 c246404357f4c">Payments in Lieu of Property Taxes (PILOT)</cite.url></list.item></para>

<para id="ed8b3445077e4c2494194056940ddb67"><emph face="b">Corporate Income
Tax Navigator Charts</emph><list.item>• <cite.url</pre>

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10069/ac96a126ab3a66a06f 77b0f88de441f5">Jurisdiction to Tax and Limitations on State Taxation,

Nexus</cite.url></list.item><list.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10069/46fca7abaf338c829c9 4bd9cf19a4890">Entities Subject to Corporate Income

Tax/Definitions</cite.url></list.item></para>

<para id="265742fc26934a3fbeba7533319cce9e"><emph face="b">Passthrough Entities
Navigator Charts/emph>list.item> $\hat{a} \in \hat{q}$

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10070/e42927f3abf54d1e850 106b768c487b6">Overview: Nexus</cite.url></list.item><list.item>• <cite.url ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10070/f819f96da737b2e1cd 1962f311e26f63">Mandatory Taxes Imposed on Pass-Through

Entities</cite.url></list.item></para>

 $<\!paraid="237ffd434d714800bfecf69ad64098b2"><\!emph\,face="b">Credits\,\&$

Incentives Navigator Charts</emph>t.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10084/2a04348507679a0ff36 256635f9aa221">Economic Development and Investment

Credits</cite.url></list.item><list.item>• <cite.url

ref="https://go.bloombergtax.com/product/tax/bbna/chart/2/10084/2b7d2eb7672f61c344d314d9f33a5466">Historic Rehabilitation</cite.url></list.item></para>

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