

[Company Letterhead]

[Date]

[Recipient Name]

[Title]

[Company Name]

[Address Line 1]

[Address Line 2]

Subject: Advisory Services - Tax Structuring and Operational Efficiency for IPO Readiness

Dear [Recipient Name],

In preparation for your proposed Initial Public Offering (IPO), we have conducted a preliminary assessment of your current tax architecture and operational workflows. This letter outlines our recommended strategy to ensure the entity is positioned for optimal valuation and compliance.

1. Tax Structuring and Nexus Optimization

To maximize shareholder value and minimize post-offering liabilities, we recommend:

- A comprehensive review of the corporate legal structure to ensure tax-efficient repatriation of funds.
- Analysis of domestic and international tax nexus to mitigate undisclosed permanent establishment risks.
- Optimization of Transfer Pricing documentation to satisfy regulatory scrutiny during the due diligence phase.

2. Operational Efficiency and Financial Controls

Public market readiness requires rigorous financial reporting standards. Our focus areas include:

- Automation of the tax provision process to reduce the period-close cycle.
- Integration of Indirect Tax (VAT/Sales Tax) compliance systems with current ERP software.
- Enhancement of Internal Controls over Financial Reporting (ICFR) to meet Sarbanes-Oxley (SOX) or equivalent standards.

3. Implementation Timeline

We propose a phased approach starting with a "Gap Analysis" in [Month], followed by the implementation of structural changes in [Month]. This ensures all remediation is completed at least two quarters prior to the filing of the S-1 or equivalent registration statement.

4. Next Steps

We suggest a formal meeting on [Date/Time] to discuss the resource allocation and budgetary requirements for this transition.

We look forward to supporting [Company Name] through this significant milestone.

Sincerely,

[Signature]

[Name of Principal Advisor]

[Title]

[Firm Name]