MCORE LAW

Unique Positioning in the Mexican Market

Why MCORE LAW?

International tax law boutique with European legal and economic training operating in the Mexican market.

The gaps in the Mexican market in international taxation

Pillar Two: technical capacity virtually nonexistent

The vast majority of Mexican firms lack the capacity to calculate the GloBE ETR per entity, the SBIE, or to structure the GIR. The burden falls on the Big Firms of the parent jurisdiction.

Transfer Pricing without methodological rigor

A significant proportion of TP studies in Mexico is limited to database searches without prior functional analysis, without transaction delineation, and without consideration of HTVI risk.

Mexico–EU–UK corridor: an underserved segment

There is no specialized boutique in Mexico with European credentials that comprehensively serves the Mexico–European Union–United Kingdom corridor. Groups with a European nexus turn to firms in Amsterdam or to the local Big Firms.

MCORE Law operates in this segment.

Credentials not easily replicated in the Mexican market

LL.M. in International and European Taxation

Maastricht University - Top 10 LL.M. program in Tax Law worldwide (LLM Guide) · European benchmark in international taxation

Solicitor Training of England & Wales

QLTS completed · English legal qualification for the Mexico–EU corridor

Deloitte Munich · TPA Global Amsterdam

Experience in European Big Firms and an international tax boutique in the Netherlands

7 years in international taxation

PEMEX · Taxvibes · RTYDC · MCORE Law – Deloitte – TPA in Mexico and Europe

+10 Tax Certifications including IBFD

Certifications from IBFD, Vena, E-Bright among other tax certifications in taxation, international taxation, M&A Tax.

Weekly academic research and publications

Global Trade and Customs Journal (GTCJ) · UNAM · ANADE · Mexican Institute of Public Accountants (IMCP).

Transfer Pricing - MCORE's methodological differentiator

MCORE LAW
We advise, we adhere, we resolve

CONVENTIONAL PRACTICE IN MEXICO

- TP study as formal compliance, without substantive analysis
- Benchmarking on databases without prior functional analysis
- Omission of transaction delineation (OECD Guidelines paras. 1.119–1.128)
- Disregard of HTVI analysis and retrospective adjustment risk
- Intercompany agreements executed after the transactions
- Absence of technical defense before the SAT-ACFPT
- Exclusively legal training without integrated economic-financial analysis

VS

MCORE METHODOLOGY

- Complete FAR analysis: functions, assets and risks per entity
- Real delineation of transactions, substance over form
- Defensible benchmarking: interquartile range with comparability adjustments
- HTVI and DEMPE analysis for hard-to-value intangibles
- Pre-transaction intercompany agreements, consistent with the documentation
- Master File + Local File + CbCR (Arts. 76-A LISR; BEPS Action 13)
- APA assessment and technical defense before SAT-ACFPT
- Dual legal-economic training integrated functional and financial analysis
- Application of European case law (ITAT, CJEU, UK Upper Tribunal, BFH) to SAT-TFJA standards

Pillar Two / GloBE — The most significant technical gap in the market

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EUR 750M

Revenue threshold for the application of the GloBE Rules

Category 3

Mexico has not adopted the GloBE rules or the IIR. The top-up tax is collected by the jurisdiction of the parent entity (EU/UK).

QDMTT: no legislation exists in Mexico to date

Scope determination and mapping of Constituent Entities

EUR 750M threshold, excluded entities (Art. 1.5 Model Rules), jurisdictional map

Computation of the GloBE ETR per entity

GloBE Income, Adjusted Covered Taxes, SBIE carve-out and top-up tax model

Transitional Safe Harbour

Analysis of the three tests (OECD Admin. Guidance Dec. 2022) — window available until fiscal year 2026

Local determination of QDMTT and global determination of IIR and UTPR

Internal group-level determination of tax contingencies arising from subjection to the Global Minimum Tax

IFRS disclosure — IAS 12 GloBE

Mandatory temporary exception (IASB May 2023); uncertain tax position (IAS 37 / FIN48) for the top-up tax

The corridor that no other boutique covers comprehensively

Mexico · European Union / United Kingdom · United States (UCLA 2026)

No Mexican tax boutique covers this Western commercial corridor comprehensively without the use of subsidiaries.

Technical specialization that the Mexican market does not easily replicate.

- Firm in Mexico with an LL.M. in European international taxation, Solicitor E&W and experience in European Big Firms
- Transfer Pricing: complete OECD methodology FAR, DEMPE, HTVI, defensible benchmarking, APAs and defense before SAT-ACFPT
- Pillar Two GloBE: technical capacity for ETR per entity, SBIE, GIR and IFRS IAS 12 virtually nonexistent in the Mexican market
- Dual legal-economic training and application of European case law (ITAT, CJEU, UK UT, BFH) to SAT-TFJA criteria
- Mexico–EU–UK–U.S. corridor: a unique position for multinational groups with a European or Anglo-Saxon nexus

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