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Plenary III: Multinationals Under Fire – Improving Relationships with Tax Authorities Worldwide

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Angel Calleja, Taxand

Jonathan Leigh Pemberton, OECD

Arthur Pleijsier, Medtronic

Overview

- ❖ Pressure on tax authorities worldwide to increase revenue has put multinationals in the firing line
- ❖ Taxand, the OECD and Taxand client, Arthur Pleijsier of Medtronic, discussed the impact of this change and the steps the OECD is taking through its enhanced relationship model to relieve some of the burden
- ❖ The discussion opened with an agreement that we are on the verge of real change for multinationals, advisors and authorities alike



Key points

- ❖ There is a need for Boards to understand the tax implications of all strategic decisions
- ❖ The idea that tax is just for technical people is outdated; tax is now seen as critical to corporate governance for any enterprise
- ❖ Non-compliance is no longer the issue, cooperation between tax administrations and collaboration with multinationals are the now key
- ❖ The OECD role is to provide a forum for debate and influence change



Key points

- ❖ Dispute resolution is growing in importance
- ❖ There is a need for consistency in the approach taken by authorities across Europe and ideally beyond
- ❖ Concern was expressed around protecting the confidentiality of shared information
- ❖ Tax advisors should be business partners as tax should be more aligned with business operations and strategy
- ❖ More speed in enhancing relationships would be desirable



Speaker Details



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Ángel is based in Taxand Spain where he is with Garrigues. He joined in 1986 when it was Arthur Andersen, and became a partner in 1997. Ángel is an International Tax practitioner who specialises in international taxation and cross-border issues with a particular focus on corporate tax planning and transfer pricing. He has more than 20 years' experience advising major multinationals. He is responsible for the tax planning and structuring of the largest investments abroad by Spanish enterprises, with a strong focus in Latin America and more recently, in the US and in the EU. He is a member of the Business Advisory Group to the OECD joint working group on transfer pricing and business restructurings.



Jonathan Leigh Pemberton
OECD, TAX DIVISION

Jonathan started his career as a Tax Inspector in 1982 and quickly moved to deal with large corporates. In 1990 he joined the Inland Revenue's International Division, initially as a technical specialist but later as a policy adviser. He was particularly involved in issues affecting the financial sector. In 1990 he joined the Inland Revenue's International Division, initially as a technical specialist but later as a policy adviser. In 2000 Jonathan was asked to lead the Capital Taxes business stream in the Inland Revenue and later HMRC; while there he applied "Lean Thinking" to drive significant improvements in the way we worked. More recently, he has returned to International Tax, leading work on the taxation of Foreign Profits and CFC's for Business International.



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