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E-News from the EU Tax Centre

Issue 174 – April 5, 2023

KPMG's EU Tax Centre compiles a regular update of EU and international tax developments that can have both a domestic and a cross-border impact, with the aim of helping you keep track of and understand these developments and how they can impact your business.

Today's edition includes updates on:

- **ECHR:** Hungarian disclosure of tax debtors' data breaches the European Convention on Human Rights
- **European Parliament:** Committees adopt Parliament's negotiation positions on the AML package
- **OECD:** Fifth peer review report on the prevention of tax treaty shopping under BEPS Action 6
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Latest CJEU, EFTA and ECHR

ECHR

Hungarian disclosure of tax debtors' data breaches the European Convention on Human Rights

On March 9, 2022, the European Court of Human Rights (ECHR or the Court) gave its decision in a case concerning the compatibility of the Hungarian rules to publicly disclose tax debtors' information with the European Convention on Human Rights.

Based on a law amendment introduced in 2006, the Hungarian tax authorities were required to publish on their website the list of taxpayers whose outstanding debts towards the state budget exceeded HUF 10 million (approximately EUR 26,400). Among others, the information to be disclosed included the taxpayers' names, home addresses, tax identification numbers and amounts of unpaid tax. The rules were challenged by a Hungarian individual on the grounds that the disclosures were in breach of Article 8 of the European Convention on Human Rights, which guarantees the right to respect for private and family life and the home.

The ECHR acknowledged that the public disclosure of tax debtors' data could be justified by the need to promote tax compliance. The Court also noted that the disclosure benefited the public interest by offering insights regarding the financial status of potential business partners. However, the Court concluded that the rules were not proportionate as compared to the negative impact on the individuals' right to privacy. The Court also held that the measure under dispute did not consider the data protection rules and the risk of potential misuse of a tax debtor's home address by the general public. The ECHR also rejected Hungary's plea that the rules under dispute were "necessary in a democratic society".

Considering the above, the Court upheld the taxpayer's complaint and found that the public disclosure rules were in breach of the European Convention on Human Rights.

EU Institutions

European Commission

Update regarding timeline for Pillar One and potential for an EU proposal in absence of an international agreement

The European Commission was requested by a member of the European Parliament (MEP) to provide additional clarifications regarding (i) a new timeline for Pillar One adoption in the EU and (ii) the potential to revert to unilateral proposals if the United States does not agree to Pillar One (e.g. digital taxes).

The European Commission noted that the current timeline agreed by the OECD's Inclusive Framework (IF) provides that a Multilateral Convention (MLC) should be signed in June 2023 "with the objective of enabling it to enter force in 2024 once a critical mass of jurisdictions as defined by the MLC have ratified it". The Commission also commented that "if appropriate, it will consider submitting a legislative proposal to address the tax challenges arising from the digitalization of the economy in the absence of the implementation of the Pillar One solution".

European Parliament

FISC sub-committee workshop on the implementation of the global agreement on the two-Pillar solution

On March 28, 2023, the European Parliament's Subcommittee on Tax Matters (FISC) held a public exchange of views with Deputy Director of the OECD Centre for Tax Policy and Administration, Dr. Achim Pross. The aim of the hearing was to give FISC members the opportunity to discuss the state of play of the global agreement on the two-Pillar solution and the challenges ahead.

Dr. Pross highlighted that the IF is still on track to finalize the MLC for Pillar One. Dr. Pross also noted that the OECD's updated estimations on revenue gains were higher than previously expected – based on 2021 data, the OECD estimates that Pillar One could allocate taxing rights to market jurisdictions of an estimated USD 200 billion in annual residual profits. According to Dr. Pross, this could translate into global tax revenues ranging from USD 13 billion and USD 36 billion.

On Pillar Two, Dr. Pross stated that the revenue impact would amount collectively to 220 billion annually, which represented nine percent of global corporate income tax.

For more information, please refer to the press release of the European Parliament.

Study on the effectiveness and distributional consequences of excess profit taxes or windfall taxes

On March 29, 2023, the European Parliament published a study prepared by the Policy Department for Economic, Scientific and Quality of Life Policies for the FISC subcommittee. The study aimed to assess the effectiveness of windfall taxes in light of the EU Regulation of October 6, 2022 on an emergency intervention to address high energy prices (Regulation). Under this Member States were required to implement a solidarity contribution on surplus profits in the fossil sector, or equivalent measures, by December 31, 2022 (for more information, please refer to E-News Issue 163).

The study observed that Member States frequently used their ability to implement a stricter cap on market revenues and that caps generally apply until the end of 2023. Regarding the solidarity contribution for the fossil fuel sector, the study noted the large variation in tax rates used, which range from the proposed minimum of 33 percent up to 75 percent. The study also noted that most Member States followed the proposed average earnings method to define the tax base for the solidarity contribution. The study concluded that based on the sample data, both the revenue cap and the solidary contribution fulfilled the objective of collecting tax revenues.

The study also highlighted the concern that windfall taxes might increase uncertainty and negatively affect future investments.

For more information, please refer to the press release of the European Parliament.

Committees adopt Parliament's negotiation positions on the AML package

On March 28, 2023, the European Parliament's Subcommittee on Economic and Monetary Affairs (ECON) and the Committee on Civil Liberties, Justice and Home Affairs (LIBE) adopted their joint position on three pieces of draft legislation on the financing provisions of EU Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) policy. Key takeaways of the position include:

- Beneficial ownership definition. The MEPs seeks to lower the percentage relevant when defining beneficial owners to 15 percent plus one share / voting rights (currently 25 percent plus one share / voting rights). The percentage would be further decreased to 5 percent for companies in the extractive industry or companies considered to be exposed to a higher risk of money laundering or terrorist financing.
- Beneficial ownership register. The MEPs suggest that information on beneficial ownership held in national central registers should be available digitally, in an EU official language as well as in English, and should include current and historical information for a defined period.

- Access to beneficial ownership information. The requested change follows the Court of Justice of the European Union (CJEU) ruling in the joined cases C-37/20 and C-601/20 – whereby the CJEU invalidated certain transparency obligations under AMLD (see EuroTaxFlash [Issue 494](#)). In the MEPs' view, persons with legitimate interest, such as journalists, reporters, any other medias, civil society organizations, higher education institutions, should be able to access the register, including the interconnected central registers. The access rights would be valid for at least two and a half years, and should be automatically renewed by Member States.
- Extended competence for AMLA. The MEPs intend to extend the competence of the future AML authority (AMLA) to monitor and assess, in line with the risk-based approach, "third countries that pose a specific and serious threat to the financial system of the Union and the proper functioning of the internal market".

As next steps, the European Parliament's negotiating position will be voted on in the upcoming plenary session in April (17 – 20 April 2023). The Council has already agreed its position in December 7, 2022. Therefore, once the Parliament adopts its position the trilogue negotiations on the AML/CFT package could start.

For more information, please refer to the press release of the European Parliament

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OECD and other International Institutions

Organisation for Economic Cooperation and Development – OECD

Fifth peer review report on the prevention of tax treaty shopping under BEPS Action 6

On March 21, 2023, the OECD released the fifth peer review report on the prevention of treaty shopping under BEPS Action 6. The report includes the results of the peer review of each of the jurisdictions that were members of the Inclusive Framework (IF) on BEPS on May 31, 2022.

The report notes that the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (MLI) has continued to significantly expand the implementation of the Action 6 minimum standard for the jurisdictions that have ratified it. By contrast, jurisdictions that have not signed or ratified the MLI have generally made no or little progress in implementing the minimum standard. Accordingly, the report concludes that the ratification of the MLI is an effective tool for the implementation of the minimum standard.

In addition, the report includes recommendations to jurisdictions that must formulate a plan for the implementation of the minimum standard, and to those that have signed the MLI but have not yet completed the steps for the entry into effect.

For more details regarding the prevention of treaty shopping, please refer to the Fifth Peer Review Report.

Peer reviews on transparency and sharing of information on request published on Saint Lucia, Mexico, Nicaragua, the Czech Republic and Albania

On March 28, 2023, the OCED Global Forum on Transparency and Exchange of Information for Tax Purposes published seven new peer review reports on transparency and exchange of information on request (EOIR). The

reviewed countries include: the Czech Republic, Albania, Nigeria, Mexico, Togo, Saint Luca and Nicaragua. With the exception of Nicaragua and Togo, the rest of the countries were rated as largely compliant.

Nicaragua is not a Forum member, but it was considered for evaluation in light of its relevance to the Forum's work on EOIR. The review was performed based on publicly available information and Nicaragua was rated as non-compliant with the standard. The main deficiency identified related to access to banking information, which is subject to bank secrecy.

Togo was subject to its first review for EOIR. The current review focused on the adequacy of Togo's legal and regulatory framework, which was found to be broadly in line with the standard (with some areas where improvement was needed). Togo will only receive a rating once Phase 2 of the review is concluded. This second phase is expected to take place at the latest in 2026 and will be focused on the practical implementation of the legal and regulatory framework.

For more details, please refer to the OECD's press release.

Local Law and Regulations

Cyprus

Reference rates for notional interest deduction (NID) announced

On March 16, 2023, the Cyprus Tax Department issued an announcement concerning the interest yields of the 10-year government bonds for a number of countries as at 31 December 2022. The interest yields of the 10-year government bonds increased by 5 percent, represents the "reference rate" for the purposes of calculating the Cyprus notional interest deduction (NID).

In respect of countries not mentioned in the announcement, taxpayers may apply to the Cyprus Tax Department for the determination of the appropriate NID "reference rate" enclosing the interest yields of the 10-year government bonds for the countries concerned as identified on the basis of the Bloomberg Index, or in the absence thereof, their estimation of the applicable rate.

For more details, please refer to the report prepared by KPMG in Cyprus.

Additional transfer pricing frequently asked questions published

In March 2023, the Cyprus Tax Department published an additional set of frequently asked questions (FAQs) with the purpose of clarifying certain provisions of the new transfer pricing legislation law (for more information, please refer to E-News Issue 172).

Key additional questions addressed by the FAQs concern:

- how the EUR 750,000 threshold in the context of loan financing activities is being determined in a tax year;
- which balance is relevant for the aforementioned threshold in the case of loan financing activities (e.g. year end, average balance for the year, facility amount);
- whether the loans or any other monetary facilities including cash withdrawals granted by companies to certain persons should be taken into account for the purposes of assessing the EUR 750,000 threshold for loan

financing activities.

For more information, please refer to a report prepared by KPMG in Cyprus.

Estonia

Clarifications on tax defensive measures against non-cooperative jurisdictions issued

On February 21, 2023, the Estonian Tax and Customs board issued an announcement providing clarifications on the tax defensive measures relating to payments made and dividends received from companies in jurisdictions included on the EU list of non-cooperative jurisdictions.

The Estonian local legislation provides for a direct reference to Annex I of the EU list on non-cooperative jurisdictions for tax purposes, that was last updated in February 2023 (for more details, please refer to Euro Tax Flash Issue 506), so that changes to the EU list are relevant once adopted by the EU, without the need for local implementation.

Further to the above, the announcement provides clarifications on the following Estonian tax defensive measures against jurisdictions deemed non-cooperative by the EU:

- 20 percent withholding tax for payments made to entities located in listed jurisdictions, such as payments for the provisions of services, even if the service was not provided in Estonia. If the payment is made to a permanent establishment in Estonia, this measure does not apply;
- non-application of the participation exemption for dividends received from companies in listed jurisdictions;
- subject to corporate income tax, in accordance to Estonia's distribution tax system, of certain costs related to listed jurisdictions;

For more information on defensive measures adopted by EU Member States against non-cooperative jurisdictions, please refer to KPMG's summary of proposed or enacted measures.

Finland

Approval of proposal for temporary windfall taxes on electricity and fossil fuel profits

On March 23, 2023, the Finnish President signed into law the act on temporary profit taxation for the electricity and fossil fuels sector for tax year 2023. The key corporate tax features of this legislation include:

- a 30 percent rate is to be applied on net taxable profits of electricity companies (subject to a number of exemptions) which are generated by certain companies in the 2023 tax year, and that exceed a 10 percent return on the company's equity as stated in its balance sheet;
- the temporary tax for fossil fuel companies is consistent with Council Regulation (EU) 2022/1854, which includes a 33 percent rate of tax on taxable profits for the tax year 2023 that exceed 120 percent of the average profits in financial years 2018 to 2022;
- the above taxes are applied in addition to corporate income tax and are not tax deductible.

For previous coverage, please refer to E-News issue 168.

Italy

Proposal for Italian tax reform includes a tax rate reduction for investing companies

On March 16, 2023, the Italian Council of ministers issued an announcement concerning the approval of a bill entrusting the Italian government with a tax reform. Key direct tax measures proposed include the conditional reduction of the Italian corporate income tax rate (IRES), provided that:

- the income is used for investments, with particular reference to qualified investments, and for recruitment;
- the profits are not distributed or allocated to purposes other than the exercise of business activities.

According to the announcement, the measures will be implemented within 24 months from the date when the bill enters into force.

Ireland

Feedback Statement published for the implementation of minimum taxation (Pillar Two)

On March 31, 2023, the Irish Department of Finance published a Feedback Statement (including draft legislation) regarding the implementation of the OECD's Pillar Two Model Rules. The draft legislation closely follows the OECD Model Rules. The key features of same are as follows:

- the Income Inclusion Rule (IIR) will apply for financial years starting after December 31, 2023;
- the Undertaxed Profits Rule (UTPR) will generally be applicable for financial year starting after December 31, 2024;
- the draft legislation does not yet provide for the calculation of a domestic top-up tax (DMTT), however, the Feedback Statement outlines two possible methods for calculating same, being (i) a detailed section in the legislation that describes every necessary element to calculate and implement the DMTT, which would be separate from the legislation's IIR and UTPR provisions, or (ii) a shorter provision referencing detailed IIR provisions with modifications (the statements notes that the latter may be the most efficient approach);
- a placeholder is included in the draft legislation for (i) the administrative procedures and (ii) safe harbors to be provided as part of a future feedback statement.

Comments on the draft legislation are requested May 8, 2023. It is expected that a further feedback statement with updated legislation will be published in mid-2023. It is reported that the Irish government will implement a qualified DMTT from January 2024. The draft legislation in respect of same is expected to form part of the Autumn 2023 budget.

Liechtenstein

Draft legislation issued for the implementation of minimum taxation (Pillar Two)

On March 28, 2023, the Liechtenstein government launched a consultation on draft legislation (in German only) to implement the OECD's Pillar Two Model Rules. The draft legislation closely follows the OECD Model Rules. Key features of the draft include:

- the (Qualified) Domestic Minimum Top-up Tax (QDMTT) and the Income Inclusion Rule (IIR) would apply for financial years starting on/after January 1, 2024;
- the Undertaxed Profits Rule (UTPR) would generally be applicable one year later, i.e. for financial year starting on/after January 1, 2025;
- the draft legislation closely follows the EU Directive and extends the scope of Pillar Two to domestic groups.

Comments on the draft legislation are requested by June 2, 2023. It is expected that Parliament will consider the report and motion in respect of same in September 2023.

Montenegro

Amendments to tax law, including real estate sales tax and corporate income tax

On March 10, 2023, amendments to various tax laws were published in Official Gazette of Montenegro. Key amendments include:

- amendment to real estate tax where a progressive tax rate between 3 and 6 percent for transfer of immovable property is introduced, with effect as from January 1, 2024;
- amendments to corporate income tax are introduced, with effect as from March 18, 2023, including:
- 30 percent withholding tax on certain payments made by a corporate income taxpayer to a non-resident legal entity that is established or has a registered seat or has a seat of management or has a place of effective management in a low-tax jurisdiction;
- a non-resident legal entity that is established or has a registered seat or has a seat of management or has a place of effective management in a low tax jurisdiction shall by default be regarded as related entity for transfer pricing purposes;
- exemption from corporate income tax payments for beneficiaries of incentives for research and development;
- transactions between a Montenegrin branch office and its non-resident headquarters must be included in the transfer pricing documentation Local file.

For more details, please refer to the report prepared by KPMG in Montenegro.

Sweden

Interim report including draft legislation for minimum taxation (Pillar Two)

On March 20, 2023, the Swedish Ministry of Finance released an updated interim report including draft legislation for the implementation of the OECD's Pillar Two Model Rules as set out under the EU Minimum Tax Directive (2022/2523).

The proposal follows the text of the EU Directive (for more details, please refer to Euro Tax Flash Issue 500) and also incorporates certain items that were subsequently released by the OECD Inclusive Framework. Key features of the proposal include:

- the Domestic Minimum Top-up Tax (DMTT) and the Income Inclusion Rule (IIR) will apply for financial years starting after December 31, 2023;
- the Undertaxed Profits Rule (UTPR) would generally be applicable one year later, i.e. for financial year starting after December 31, 2024;
- the draft takes into account the OECD Commentary and elements of the GloBE Implementation Framework, such as providing clarifications regarding the routine profits test under the transitional safe harbor;
- the transitional safe harbor rule is largely consistent with the OECD rule, however it should be note that national groups are not covered by same.

Comments on the draft legislation are requested by May 15, 2023. For more information, please refer to KPMG's Tax News Flash.

United Kingdom

Draft legislation to implement minimum taxation (Pillar Two)

On March 23, 2023, the UK government published draft legislation in the Spring Finance Bill to implement the OECD's Pillar Two Model Rules.

The proposal follows the text of the OECD Model Rules and also incorporates certain items that were subsequently released by the OECD Inclusive Framework. Key features of the proposal include:

- The Qualifying Domestic Minimum Top-up Tax (QDMTT) and the Income Inclusion Rule (IIR) would apply for financial years starting after December 31, 2023. However, the draft legislation does not provide details for a UTPR.
- The draft legislation includes updates for areas that were missing from the first draft of the IIR (e.g. in respect of transfers of assets or liabilities). It also reflects the latest administrative guidance from the OECD, such as temporary rules setting out the treatment of US global intangible low-taxed income.
- The draft legislation also includes a provision such that for the purpose of ensuring consistency with the Pillar Two rules, the Treasury may by regulations make further provisions or adapt existing provisions regarding the Multinational Top-Up tax. This may enable the Treasury to maintain consistency with the OECD Framework as further guidance documents are released. Please note that these powers may not be exercised after 31 December 2026.

For more details, please refer to a report prepared by KPMG in the UK.

Other tax measures in the Spring Finance Bill 2023

On March 23, 2023, the UK government published draft legislation in the Spring Finance Bill 2023. The key direct tax measures in respect of same were outlined in E-News issue 173.

For more details, please refer to the dedicated report by KPMG in the UK.

Local Courts

Sweden

Foreign tax credit carry-forward allowed on income not subject to foreign tax

On March 16, 2023, the Swedish Supreme Administrative Court (the Supreme Court) held that a foreign tax credit carried forward from previous tax years could be used to offset Swedish tax on foreign-source income in the current year, even in cases where the income was not subject to any foreign tax in the current year.

Under the Swedish tax law, taxpayers are allowed to claim a credit for taxes paid abroad. Such foreign taxes can be offset against the Swedish tax liability, up to an annual threshold computed based on the foreign income derived by the taxpayer. The relevant foreign income includes certain income elements taxable in Sweden, but which were not taxed abroad (e.g., interest). Unused foreign tax credits can be carried forward for up to five years. The plaintiff was a Swedish company that intended to use in 2017 a foreign tax credit carried forward from 2012. In addition,

the only foreign income derived by the plaintiff in 2017 was interest, which was not subject to taxation abroad. The Swedish tax authorities denied the taxpayer's claim to credit the foreign tax carried forward on the grounds that taxpayers are required to have foreign-source income subject to foreign tax in the year when the credit is used. The taxpayer challenged the tax authorities' decision and, following several appeals, the case was brought to the Supreme Court.

The Supreme Court held that the tax authorities' position was not supported by the wording of the Swedish Tax Code. Therefore, the Supreme Court held that the taxpayer must be allowed to use the foreign tax credit carried forward to offset Swedish tax applicable to its current year foreign-source interest income.

For more details, please refer to a tax alert prepared by KPMG in Sweden.

United Kingdom

Court of Appeal judgment on the use of cross-border losses

On March 1, 2023, the UK Court of Appeal (Court of Appeal) issued a decision in a case concerning the compatibility of the UK group relief rules with EU law.

Under the UK group relief rules applicable at that time, tax deductible losses could be transferred from a company within the group – including permanent establishments, to another member of the group. However, group relief could be denied where such losses were "deductible from or otherwise allowable against" non-UK profits derived by group companies.

The UK tax authorities (HMRC) disallowed group relief claims submitted by several UK resident companies with respect to losses incurred by a UK permanent establishment of a Dutch group company. HMRC based their decision on the grounds that the group relief limitation above applied, since the permanent establishment was part of a 'fiscal unity' in the Netherlands and its losses were set-off against profits in that fiscal unity. The plaintiff challenged the decision and based their plea on the CJEU decision in the case C-18/11. In this case, the CJEU found – in a similar situation, that the UK rules represented a restriction on the freedom of establishment and rejected the prevention of the double use of losses as a justification. Instead, the CJEU stated that the fact that the losses could be used in both the UK and the Netherlands did not affect the UK's power to tax.

The First-tier Tribunal considered the matter acte clair (i.e. the finding was clear) in the taxpayers' favor. By the time the case reached the Court of Appeal, it was no longer possible to make a referral to the CJEU (due to Brexit) and the Court of Appeal considered the facts without input from the EU.

The Court of Appeal acknowledged the HMRC's plea that the CJEU departed from C-18/11 in the subsequent case C-28/17. This latter case represented a significant shift in the Court's previous case law on the utilization of cross-border losses. It concerned the compatibility with EU law of the Danish rules on the deductibility of losses from a Danish permanent establishment whose head office was not tax resident in Denmark. The Court concluded that the Danish legislation constituted a restriction to the freedom of establishment, but that such restriction was justified by the prevention of double deduction of losses – for more details please refer to EuroTaxFlash Issue 377.

The Court of Appeal noted that whilst the CJEU was not subject to the doctrine of precedent, it aims to be consistent and tends to adhere to earlier authority. The Court of Appeal observed that, in their view, case C-18/11 was no longer applicable given the shift brought by subsequent case-law. As a result, the Court of Appeal held that the rules under dispute are compatible with EU law.

HMRC raised the alternative argument that the Court of Appeal should exercise its powers under the European Union (Withdrawal) Act 2018 to depart from EU law. The Court of Appeal did not consider this point, but HMRC raising this argument may be of interest to taxpayers relying on EU law for continuing cases.

For more details, please refer to a tax alert prepared by KPMG in the UK.

KPMG Insights

EU Tax Perspectives

The European Union's (EU) institutions have been very busy in the past few months, discussing EU implementation of international initiatives and working on upcoming EU-specific proposals.

Against this backdrop, in the March 2023 session of the "EU tax perspectives" webcast series, a panel of KPMG specialists shared their insights on some of the latest developments from across the EU affecting multinational groups operating in Europe, including:

- BEPS 2.0 in the EU: state of play on the implementation of the EU Minimum Tax Directive (Pillar Two)
- Unshell Directive (ATAD 3): state of play and likelihood of adoption
- Tax transparency reporting, including practical insights on the EU Public Country-by-Country (CbyC) Directive
- EU list of non-cooperative jurisdictions: the February 2023 update and its implications

Please access the event page for a replay of the session.

EU Financial Services Tax Perspectives

Countries across the European Union (EU) and Europe continue to face an unsettled environment. With the financial services sector going through transformative change and tax so often intertwined in negotiation and debate on policy, trade, strategy and business transformation, tax leaders across the sector's services continue to face new challenges in navigating rapid changes in response to new tax policy.

So what's on the horizon? Will the tax landscape become more volatile in the future, and what does this mean for financial services institutions?

KPMG professionals took a closer look at some of the latest proposals that have risen to the top of the European tax agenda. The panel of KPMG tax specialists shared their insights on some of the latest developments impacting the financial services industry, including:

- Preparing for Pillar 2 – practical insights and methodologies being adopted by the financial services sector
- ATAD 3 EU Unshell Directive - state of play and likelihood of adoption
- Update on the dividend withholding tax reassessment on delta one transactions
- EU update: Implications for those countries who are on the EU list of non-cooperative jurisdictions, latest EU withholding tax developments, and much more.

Please access the event page for a replay of the session.

Webcast - DEMPE and intangibles: Controlling transfer pricing risks

Since 2015, transfer pricing disputes over intangibles have proliferated. Across Europe, tax administrations are placing greater emphasis on the performance of DEMPE functions and the risk control framework to argue for higher shares of a group's profit (though not losses). Though this is a general trend, there are also variations in experiences across countries.

On March 28, 2023, the second Future of Tax & Legal webcast led by the EMA Transfer Pricing Insights team discussed KPMG professionals' experience managing disputes around the pricing of intangibles and what this means for businesses operating in Europe, focusing on:

- Issues that commonly give rise to disputes
- Different local experiences
- Dispute prevention
- Dispute management and resolution

Please access the event page to register.

Tax Reimagined – Data, Governance and Performance insight

Many companies have a data and technology strategy for their tax function to access faster, more accurate data but often don't use their data to gain insights into key areas which can help organizations make better decisions or drive data quality improvements. In terms of performance, companies should be using their data to benchmark themselves internally against other functions and, where possible, their peers. This then helps determine informed decision making.

On April 25, 2023, the next instalment in the KPMG Future of Tax webcast series will hear directly from clients as to what insights they are getting from dashboard analysis of their data and how they are using this to drive value across their function and the business.

Please access the event page to register.

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