

Tax disputes: six key themes at a glance



Key issues for enquiries: transfer pricing, permanent establishment, diverted profits tax, withholding tax, interest deductibility.



Tax authorities are seeking increasingly significant amounts of information, with taxpayers needing to consider options to narrow the scope of requests and control the flow of information.



Advance Pricing Agreements can often turn into audits for past periods, including discovery assessments. There is greater complexity in agreeing APAs today.



Tax enquiries are becoming more aggressive. HMRC is using diverted profits tax as a lever to shift the bargaining power.



Tax authorities are under pressure, politically and more broadly, to increase tax revenues from multinationals as a way to 'fill the tax gap'. Are targets for tax authority officers a possible next step?



Tax authorities are growing in sophistication. They have greater resources, bigger and more specialised teams, and better tactics for cooperation, both internally and with their foreign counterparts.

REMEMBER: Facts don't win cases; perceptions do.