CBS COPENHAGEN BUSINESS SCHOOL

NTRC Nordic Tax Research Council

CBS INTERNATIONAL TAX CONFERENCE 2024

EQUIS ACCREDITED · AACSB ACCREDITED · AMBA ACCREDITED · CEMS · PIM

Program

13:00 – 13:05 | **Opening Remarks** | *Peter Koerver Schmidt*

13:05 – 13:55 | **Presentation** | *Jakob Bundgaard*

13:55 – 14:45 | **Presentation** | *Elin Sarai*

14:45 – 15:15 | **Coffee Break**

15:15 – 16:05 | **Presentation** | *Philip Baker*

16:05 – 16:55 | **Panel Discussion** | *Moderated by Jeroen Lammers*

16:55 – 17:00 | **Closing Remarks** | *Peter Koerver Schmidt*

17:00 – 18:00 | **Drinks Reception**


2024 The 76th Congress of the International Fiscal Association
27-31 OCTOBER 2024 | CAPE TOWN | SOUTH AFRICA

Jakob Bundgaard

Managing Director
CORIT Advisory

CBS

NTRC Nordic Tax Research Council

The Role Of The Tax System In The Green Transition

Jakob Bundgaard

CBS International Tax Conference
21 November 2024

CBS

NTRC Nordic Tax Research Council

ITR WORLD TAX
TOP TIER FIRM
2025

CORIT ADVISORY

SETTING THE SCENE

- Theme: The role of the tax system in the green transition to combat climate change

- Backdrop: Market failure - insufficient pricing signal on carbon emissions

- Policy options
  - Cap and Trade Systems (financial markets)
    - Eg. The EU Emission Trading Scheme (ETS) – same effect as a tax
  - Actual tax measures
    - Discouragement: Carbon taxes
    - Encouragement: Tax incentives

- Purpose: Illustrate the potential importance of the tax dimension with three current examples from actual business models
  - Voluntary Carbon Off-set credits
  - Carbon Capture and Storage (CCS)
  - Transfer pricing discussions on renewable energy projects

- Each showcasing important lessons…..

VOLUNTARY CARBON CREDITS AND OFF-SETS

CORIT ADVISORY

VOLUNTARY CARBON CREDITS

- Carbon credits represents a right emit to one metric tonne of carbon dioxide (either based on permit or offsetting activity)

- Carbon markets involving carbon credits are introduced as a financial incentive to change behavior towards reducing GHG emissions
  - Credits are generated from a host of activities within biological (reforestation) or geological carbon sequestration (land use and biomass to soil) or direct air capture

- Two sub-groups of carbon markets and credits
  - Compliance Carbon Markets (CCM) – Cap and Trade – Allowances and Certified Emission Reduction (CER) credits (JI/CDM)
  - Voluntary Carbon Markets (VCM)
    - Neither legally mandated nor enforced
    - Voluntary Emissions Reductions (VER) => "Credits" (Lingo challenges)
      - *Avoidance credits* (emissions are credited by reductions elsewhere – low value)
      - *Carbon removal credits* (requires actual reduction of emissions – more impact – more valuable)
    - Quality assurance is critical: *Additional, permanent, measurable and verifiable (EU legislation in progress)*

CORIT ADVISORY

VOLUNTARY CARBON CREDITS

- The tax dimension: Generally, no specific tax legislation and very limited case law – no uniformity

- Understanding the business cycle and tax challenges
  - Overall characterization of offset/removal credits
    - Intangible asset, inventory, allowance, financial instrument, transferable securities etc.
  - Cross border transactions- Tax treaty issues?
  - Treatment of issuer upon project development and credit issuance?
  - Treatment of buyer
    - Deductibility/depreciation?
    - Surrender/retirement?
  - Transfer pricing
    - No special rules – awareness of industry complexities (e.g., trading as a service)

  - All questions and no answers!!!

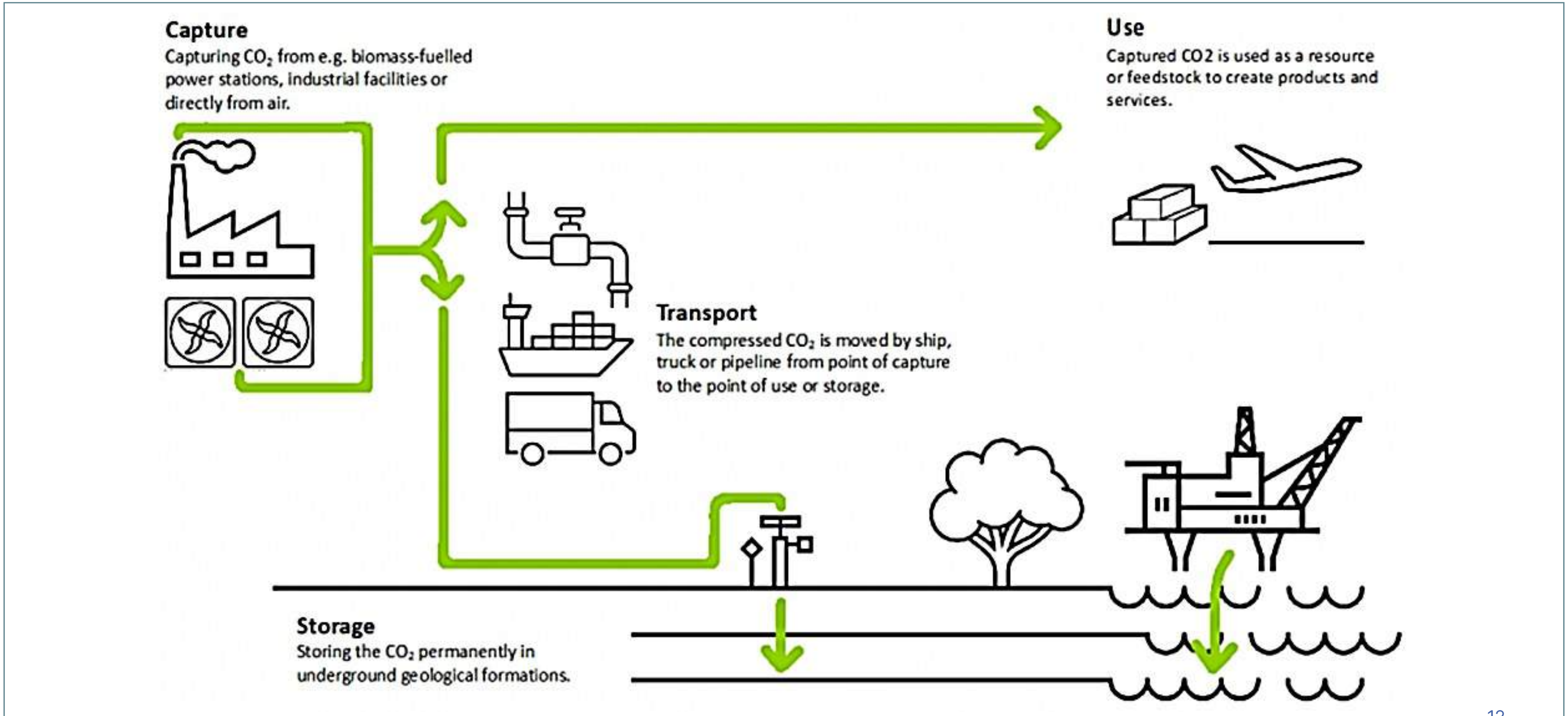
LESSONS

Lesson 1

- Absence of targeted tax legislation and uncoordinated taxation may disturb the market and influence the behavior of the operators on the VCM or even create mismatch opportunities or loopholes……

CARBON CAPTURE AND STORAGE (CCS)

CARBON CAPTURE AND STORAGE



12

THE ROLE OF THE TAX SYSTEM

- Moving up the political and business agenda – decided to be part of a realistic solution

- EU: Net Zero Industry Act (Regulation on establishing a framework of measures for strengthening Europe's net-zero technology manufacturing ecosystem – 13 June 2024
  - Union objectives (50 M/tonnes/year by 2030)
  - CO_2 transportation infrastructure
  - Mandatory contributions for oil and gas producers

- The tax dimension
  - Not yet directly addressed. Tax position derived from general tax law
  - EU: The primary incentive seems to be that captured CO_2 is not considered to be emitted for the purposes of the EU's ETS (explicitly mentioned in the EU's Emission Trading Directive since 2015)
  - US: Targeted tax credit for Carbon Sequestration (Internal Revenue Code Section 45Q) "to incentivize investment in carbon capture and storage (CCS) projects."

CORIT ADVISORY

THE ROLE OF THE TAX SYSTEM

Understanding the business cycle and tax challenges

- Construction phase
  - Deduction for construction and installation phase?
  - Special considerations for oil and gas producers – Uplifted tax deductions (hydrocarbon tax regimes)
  - Depreciation/classification of facility

- Capture – payments from emitters

- Transportation element
  - Pipelines, waterborne transport (by ship), or via rail or road networks
  - Tax imposed on the use of pipelines?
  - Does a pipeline constitute a permanent establishment, property, or something else entirely different
  - Transport via rail and road networks - Shipping and tonnage tax?

- Storage
  - Payment for this service from other greenhouse gas emitters
    - Resource rent taxation? Is subsoil a common good?
    - The 2013 review of the Danish Hydrocarbon Tax Act: *"This suggests that in the long term, income from CO_2 storage should be included under the hydrocarbon taxation."*

- All questions and no answers!!!

LESSONS

Lesson 2

- Tax treatment may be critical to launch the CCS industry - importance of deduction of massive investment costs while understanding value creation and avoiding multiple layers of taxation in business lifecycle……

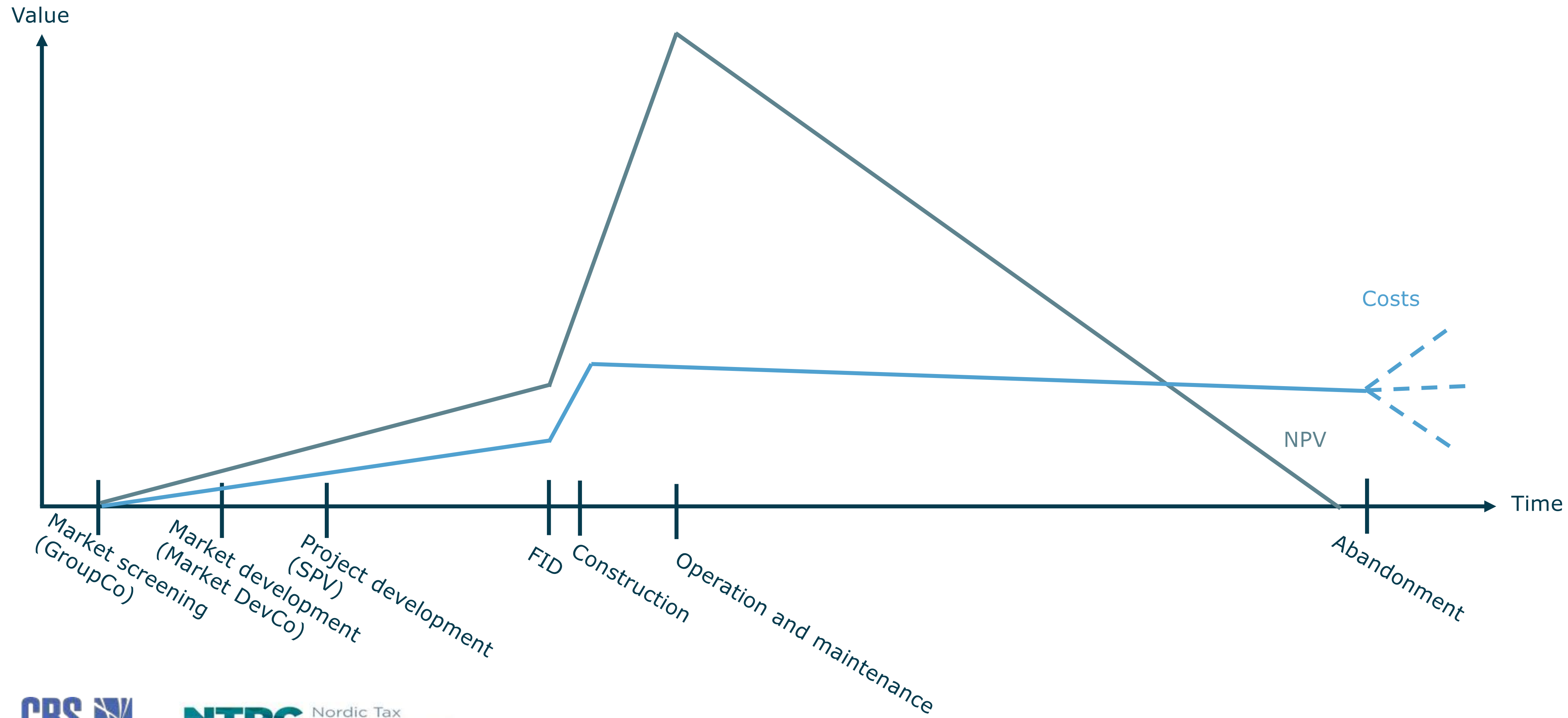
TRANSFER PRICING CHALLENGES TO THE RENEWABLE ENERGY SECTOR

TRANSFER PRICING IN RENEWABLE ENERGY PROJECTS

The issue

- Both the industry and tax authorities are testing new waters regarding the transfer pricing treatment of renewable energy projects
  - We're witnessing increased appetite for revenue and scrutiny from tax authorities, who challenge many of the structures which have been put in place within the sector
- Much uncertainty still prevails in this regards, as many questions remain unanswered
  - Widespread fear of taxation outcomes in the sector
- No best practice has yet formed…
- Renewable energy projects are complex and share many similarities with other project-based industries, such as the oil and gas industry, but also important differences

BUSINESS MODEL IN A NUTSHELL



TRANSFER PRICING IN RENEWABLE ENERGY PROJECTS

- Important starting point: application of ordinary transfer pricing rules under each phase of the business lifecycle to understand value creation
  - Avoid being "blinded by head lights"
  - It should be ensured that the income allocation does not result in 100% of the profit to be allocated to either SPVs or the parent company

- Is there a transaction? Actual or deemed?
  - For example, intra-group services, financing arrangements, guarantees, transfer of assets, use of IP, etc.?

- A FAR-analysis should be performed
  - Typical FAR-analysis may prove insufficient
    - Complex
    - Potentially understatement of tangible assets?
    - Impact of market specifics, such as state aid, the use of natural resources, or if the activity can only be carried on in a particular market, should have
    - Shortcoming of Significant People Functions as allocation key when the activity doesn't require any significant people ("personallosen Betriebsstätten", Bundesfinanzhof, Case No I B 44/21)

- Use of or transfer of IP (hard to value or valuable)?
  - Preliminary investigations?
  - Knowhow?
  - Performance guarantees?
  - Rights to a project?
  - Licenses
  - Intra-group (administrative) services?
  - Permissions?
  - Goodwill?
  - Subsidy contracts (CfD, etc.)?

- Tax authorities take the position that services provided constitute a transfer of IP that should be compensated at a level commensurate to the potential, expected lifetime income from the projects

- Therefore: Ensure remuneration for preliminary investigations, performance guarantees, administrative intra group services

LESSONS

Lesson 3

- Grotesque and business undermining tax outcomes may arise due to:
  - Complexity
  - Lack of understanding of business model and value creation
  - Not paying for actual services, use of rights etc.
  - Absence of sanity checks of outcomes

20

Thank you!

CORIT ADVISORY P/S
LYNGBY HOVEDGADE 60, 1st floor
2800 KONGENS LYNGBY
DENMARK

WWW.CORIT-ADVISORY.COM

Elin Sarai

Associate Professor
NHH Norwegian School of Economics

Navigating Tax for Nordic-style Growth

Assistant prof. Elin Sarai

Norwegian school of economics

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

How can recent tax policy developments contribute to achieving Nordic-style growth?

International developments:

ATAD, DAC, CBCR

PILAR 1 and 2: address the tax challenges arising from the digitalization of the economy

RESULT – PILLAR 2

«Taxpayers, who will have to adapt their information gathering and reporting to the new regulations, will incur increased costs for complying with the rules and for implementing this in their systems. It is assumed that the costs will be particularly high in the first period.

«In the long term, there is reason to believe that the authorities in virtually all countries will adapt to the regulations, either by amending existing regulations, or by introducing rules on tax inclusion and national supplementary tax. In that case, the direct proceeds from the supplementary tax will be virtually zero"

The Norwegian Ministry of Finance (source: Prp. nr. 29 LS (2023-2024))

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

What makes Norway attractive for innovation and investment?

=> The political framework is quite predictable

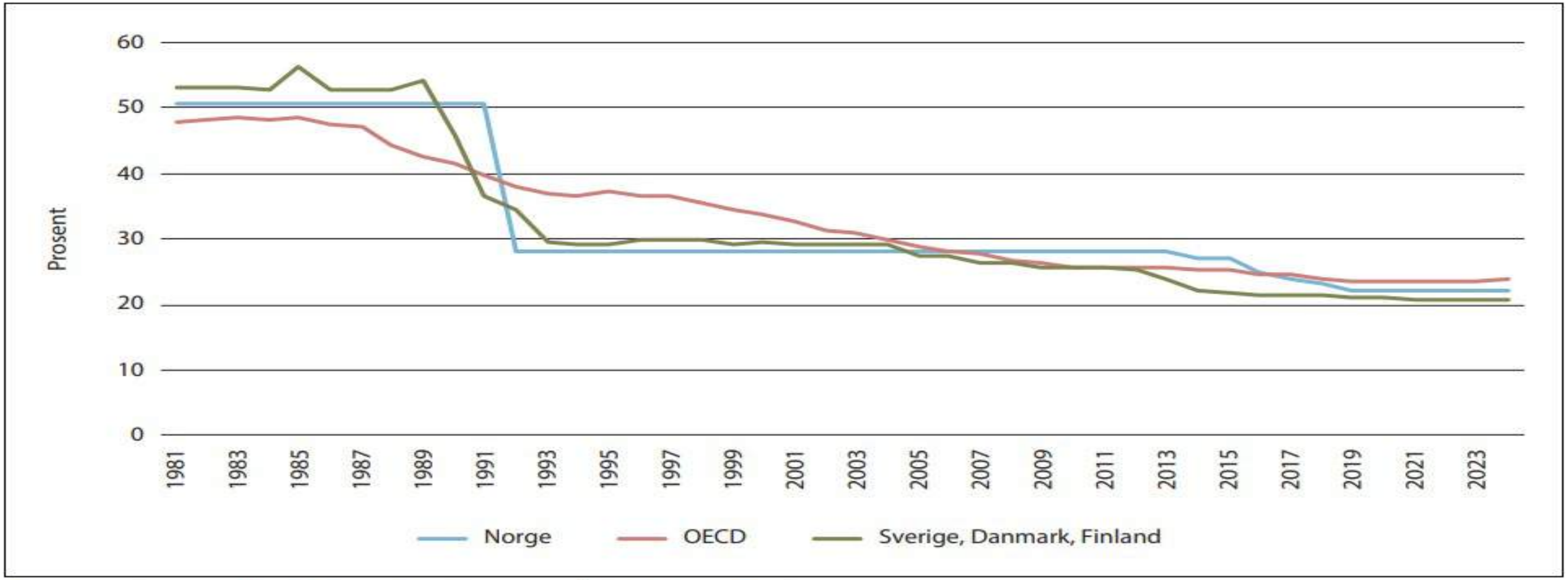
=> Moderate tax rates (22% corporate tax)

=> Digitized and less resource-intensive compliance

=> Easy to transfer money across borders, easy access to the legal system, great transparency

CBS NTRC Nordic Tax Research Council

NAVIGATING TAX FOR NORDIC-STYLE GROWTH



Figur 6.1 Formelle selskapsskattesatser.[1] 1981–2024. Prosent

[1] Uveide gjennomsnitt for Sverige, Danmark og Finland og for OECD.
Kilder: OECD og Finansdepartementet.

Favorable tax arrangement:

The Exemption Method (fritaksmetoden)

=> No tax on dividends or gains for company shareholders

=> No stamp duty when issuing or trading shares

=> This rule also applies when EU/EEA companies hold shares in Norwegian companies

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

Favorable employee stock option tax rules for Startup Companies - the grant or the redemption of options are not taxable if:

- The strike price is not set lower than the market value of the share at the time of grant
- NO payroll taxation
- Taxation when the shares are realized
- The scheme is considered as state aid, but is approved by ESA

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

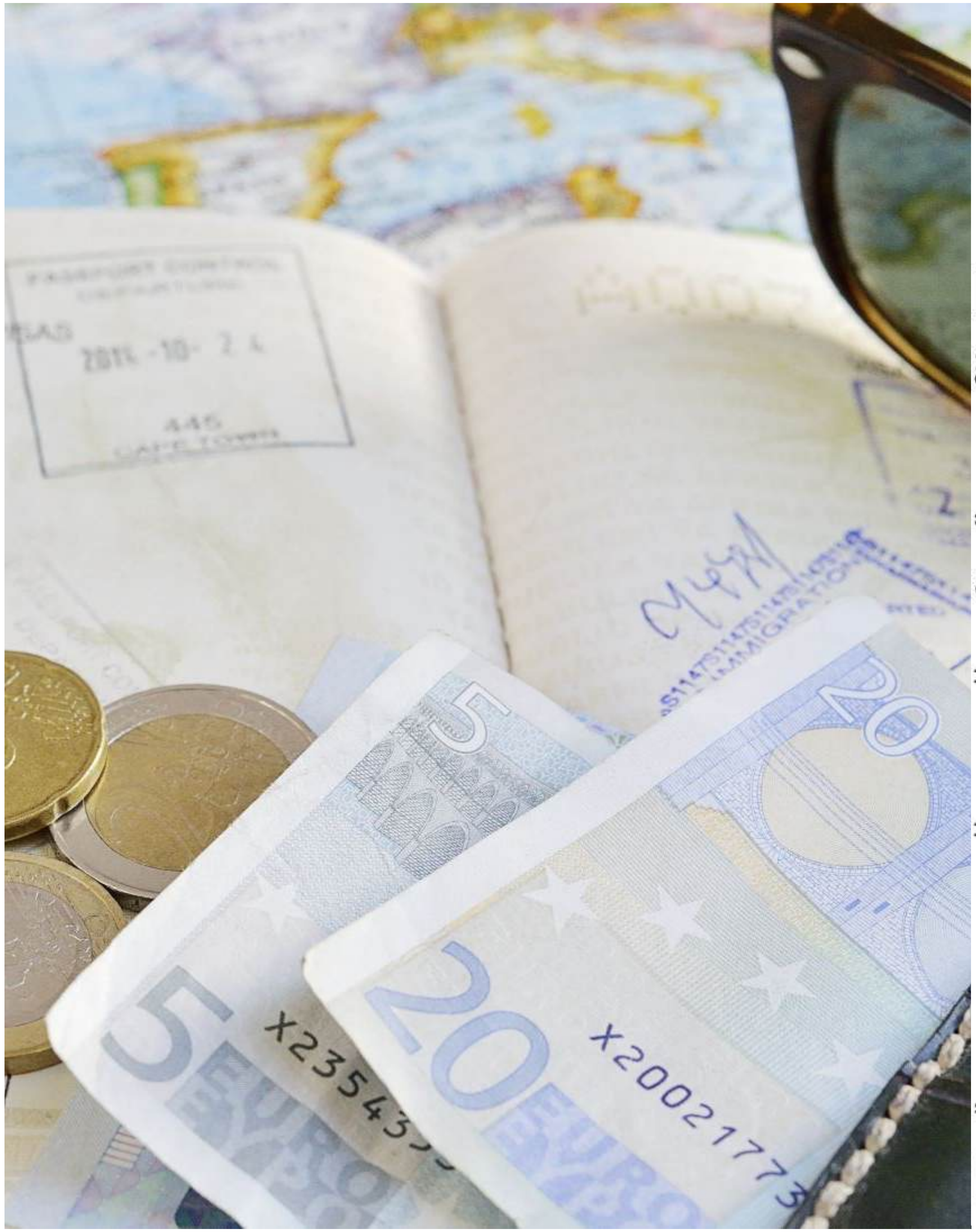
DET KONGELIGE
NÆRINGS- OG FISKERIDEPARTEMENT

Meld. St. 6

(2024–2025)

Melding til Stortinget

Gründere og oppstartsbedrifter



NAVIGATING TAX FOR NORDIC-STYLE GROWTH

Recent national tax developments – a problem for growth in investments?

=> Introduced 25% resource rent tax on aquaculture

⇒ Dividend tax has increased from 31.6% in 2021 to 37.84%

⇒ Wealth tax – Norway is one of the few countries in the OECD that has a wealth tax. Valuation and tax rates have been increased under the current government

=> An exit tax has now been introduced that is perceived as too drastic

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

Nettavisen Økonomi.

Direktesport **Pluss** Na Live Nyhetsb

Sveits

Vedums nye exit-tall: 82 megarike utflyttere på to år

FERSKE TALL: Finansminister Trygve Slagsvold Vedum (Sp) har lagt fram nye tall som viser at 82 megarike personer har flyttet fra Norge i 2023 og 2022. *Foto: Fredrik Varfjell (NTB)*

The new Norwegian exit tax as of 20 March 2024:

Exit tax to be paid over a period of 12 years => applicable for latent gains in excess of NOK 3 million

Taxpayer may:

=> Pay all exit tax on the date of leaving Norway

=> Pay in interest-free instalments over 12 years

=> Pay after 12 years, with the addition of interest

What happens to value development after the time of exit does not matter

NAVIGATING TAX FOR NORDIC-STYLE GROWTH

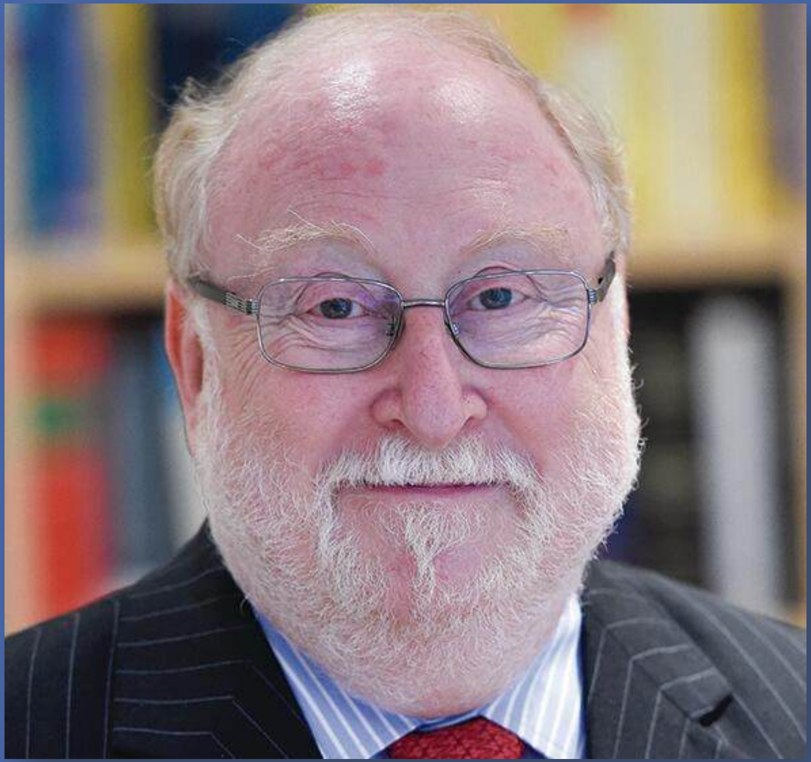
Summary:

Norway, like its neighboring countries, is an attractive place to make investments, with a stable framework.

BUT – wealth tax and dividend tax create challenges for Norwegian investors

Coffee break

Philip Baker KC
Field Court Tax Chambers



FIELD COURT TAX CHAMBERS

Taxation, Taxpayers' Rights and Human Rights

Copenhagen Business School
November 21st 2024

PHILIP BAKER KC
Field Court Tax Chambers
3 Field Court, Gray's Inn
London WC1R 5EP
Visiting Professor, Oxford University
e-mail: pb@fieldtax.com

OUTLINE OF PRESENTATION

- Background – the UN Discussion
- Taxpayers' Rights and Human Rights
- Protection of Taxpayers' Rights
- Human Rights Law – An Introduction
- Human Rights Law and Taxation
- Taxation and Economic, Social and Cultural Rights
- Some concluding comments

pb@fieldtax.com

1) Background – the UN Discussion

- UN Terms of Reference – Draft 1:

9. Efforts to achieve the objectives of the framework convention therefore should:

   c. be fully aligned with international human rights law and States' existing commitments under human rights conventions to respect, protect and fulfil all human rights for all people in all countries;

- UN Terms of Reference – Final Draft:

9. Efforts to achieve the objectives of the framework convention therefore should:

   c. in the pursuit of international tax cooperation be aligned with States' obligations under international human rights law;

- Note: removal of references to safeguards for taxpayers

1) Background – The UN Discussion

- **EU Council Statement, 27th September 2024**

Position of the European Union and its Member States for the 79th session of the UN General Assembly

We regret that the Terms of Reference do not reflect our key points of concern, namely as regards the need for:

- ….

- inclusion of taxpayers' rights and safeguards.

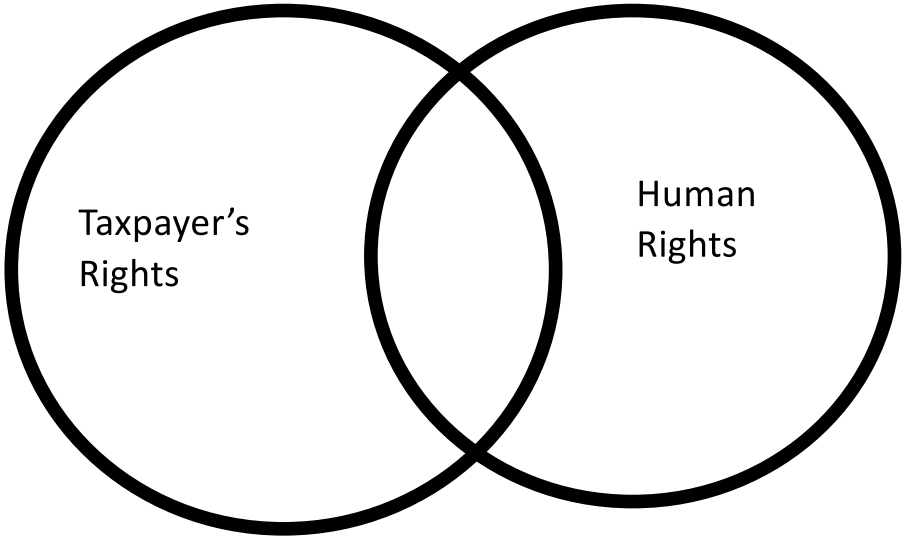
- Note: legacy of the OECD – has no specific human rights mandate
- Note: some confusion over taxpayers' rights and human rights (e.g. statement for the UN HCHR)

pb@fieldtax.com

2) Taxpayers' Rights and Human Rights

- Taxpayer's Rights – rights enjoyed by all persons (including entities) when subject to the tax system (imposition, assessment, collection, penalties, appeals etc)
- Human Rights – rights derived from the body of international human rights law (see below)
- There is an overlap between the two:
  - E.g. - tax appeals are guaranteed under domestic tax laws, but also fall within the right to a fair trial in Human Rights instruments
  - E.g. - non-discrimination may apply under national law (e.g. national constitutions) and under Human Rights instruments

2) Taxpayers’ Rights and Human Rights



pb@fieldtax.com

3) Protection of Taxpayers' Rights

- Examples (not necessarily covered by human rights law):
  - Non-retrospective tax legislation
  - Taxation in accordance with ability to pay
  - Right to a hearing before the tax authorities
  - Right to be represented by a professional adviser

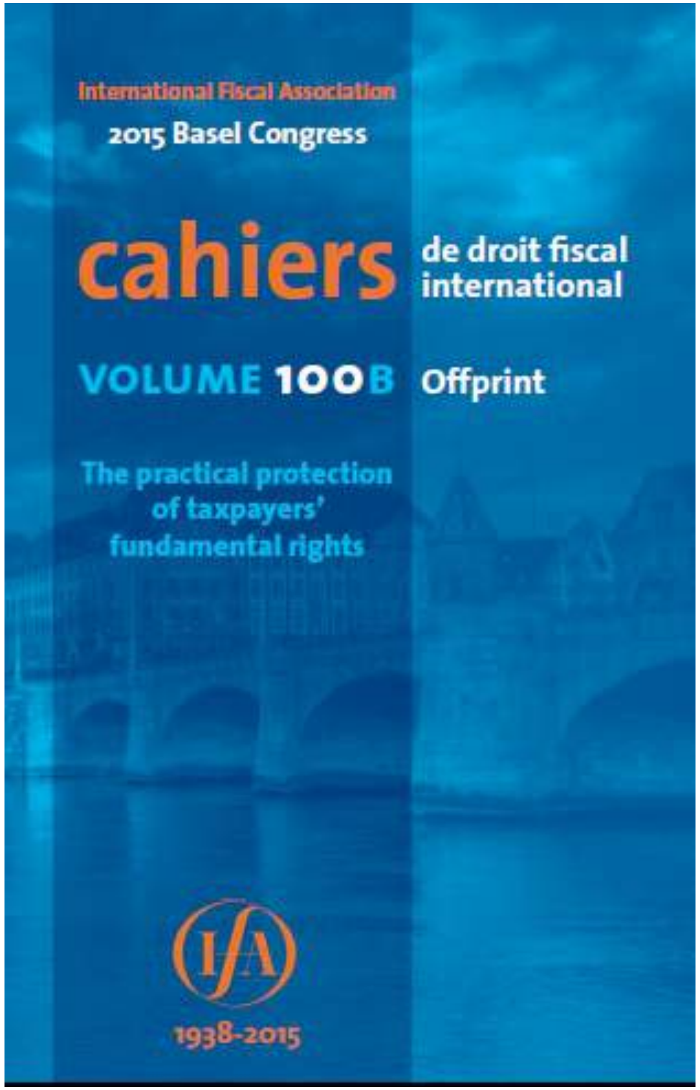
3) Protection of Taxpayers' Rights

- Protection under domestic law (national, regional and local)
  - constitutional law – e.g. ability to pay principle; non-discrimination rule
  - tax laws - e.g. during audit or on appeal
  - administrative law
  - specific laws for taxpayer's rights
    - Taxpayers' charters and taxpayer's bills of rights

3) Protection of Taxpayers' Rights

- Note on the practical protection of taxpayers' rights
- The 2015 IFA Report

pb@fieldtax.com



International Fiscal Association

2015 Basel Congress

cahiers de droit fiscal international

VOLUME 100B Offprint

The practical protection of taxpayers' fundamental rights

1938-2015

3) Protection of Taxpayers' Rights

- The Observatory on the Protection of Taxpayers' Rights
  - https://www.ibfd.org/Academic/Observatory-Protection-Taxpayers-Rights
- **The 9th International Conference on Taxpayer Rights** 4th – 6th June, 2024, in Antwerp, Belgium, hosted by the DigiTax Centre at the University of Antwerp. The theme of the 9th Conference was *Toward a Digital Taxpayer Bill of Rights.*
- **The 10th International Conference on Taxpayer Rights** will be held at Harvard on 4th – 6th June 2025

3) Protection of Taxpayers' Rights

- Protection under international law
  - public international law rules
    - Non-expropriation; non-discrimination
  - double taxation conventions
    - Non-discrimination articles
  - regional laws – e.g. EU / EEA law
    - EU Charter of Fundamental Rights (? Part of human rights law)

pb@fieldtax.com

4) Human Rights Law – An Introduction

- **The UN Charter, 26th June 1945**

Article 1

"The Purposes of the United Nations are:

3. To achieve international co-operation in solving international problems of an economic, social, cultural, or humanitarian character, and in promoting and encouraging respect for human rights and for fundamental freedoms for all without distinction as to race, sex, language, or religion; …."

4) Human Rights Law – An Introduction

- **The International Bill of Rights**
- The Universal Declaration of Human Rights, 10th December 1948 – General Assembly Resolution 217
  - Covers both civil and political rights and economic, social and cultural rights
  - Not a legally binding instrument as such
- International Covenant on Civil and Political Rights, 16 December 1966 (General Assembly resolution 2200A (XXI))
- International Covenant on Economic, Social and Cultural Rights, 16 December 1966 (General Assembly resolution 2200A (XXI))

4) Human Rights Law – An Introduction

- **International Covenant on Civil and Political Rights,** 16 December 1966 (General Assembly resolution 2200A (XXI))
- 173 States Parties (optional protocol 117 states)
- E.g. Art 14 – right to a fair trial
- Art 17 – right to privacy
- Art 26 – prohibition of discrimination
- Civil and political rights are “immediate”
- Supervised by the Human Rights Committee
- Periodic reports – may refer to tax rules

pb@fieldtax.com

4) Human Rights Law – An Introduction

- **International Covenant on Economic, Social and Cultural Rights,** 16 December 1966 (General Assembly resolution 2200A (XXI))
- 171 States Parties (optional protocol 26 states)
- E.g. Art 11 – the right to an adequate standard of living
- Art 12 – the right to health
- Art 13 – the right to education
- Economic and social rights are to be progressively realized and establish minimum standards
- Supervised by the Committee on Economic, Social and Cultural Rights
- Periodic reports – refer to tax rules

4) Human Rights Law – An Introduction

- Other human rights instruments:
- E.g. **Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), 18th December 1979**
- 189 States Parties (optional protocol 115 countries)
- Supervised by the Committee on the Elimination of Discrimination against Women

4) Human Rights Law – An Introduction

- **UN Procedures**
- Special rapporteurs, independent experts, working parties
- UN Treaty Based Bodies
  - Human Rights Committee (ICCPR)
  - Committee on Economic, Social and Cultural Rights
  - Committee on the Elimination of Discrimination Against Women
- UN Charter-Based Bodies
  - Human Rights Council
  - Office of the High Commissioner on Human Rights
  - UNSR on extreme poverty and human rights
  - Independent Expert on foreign debt

4) Human Rights Law – An Introduction

- **Regional instruments – Example: the European Convention on Human Rights (ECHR)**
  - Convention for the Protection of Human Rights and Fundamental Freedoms, Rome, 4th November 1950
  - Council of Europe – 46 (used to be 47) Members
  - Supervised by European Court of Human Rights ("ECtHR")
  - All Members recognise right of individual petition
  - Over 1,000 tax cases since the 1980s

5) Human Rights Law and Taxation

ICESCR Concluding Observations: Democratic Republic of Congo, 2022 (E/C.12/COD/CO/6)

24. The Committee is concerned about the limited extent to which domestic resources are being mobilized for the realization of economic, social and cultural rights. It notes with concern that **taxation brings in only a small portion of State revenues and that insufficient tax revenues are generated from productive sectors such as mining, which situation could limit the State's ability to reduce the high level of inequality** (art. 2 (1)).

5) Human Rights Law and Taxation

CEDAW Concluding Observations: Switzerland 2016 (CEDAW/C/CHE/CO/4-5)

40. The Committee is concerned about:

The State party's financial secrecy policies and rules on corporate reporting and taxation having a potentially negative impact on the ability of other States, in particular those already short of revenue, to mobilize the maximum available resources for the fulfilment of women's rights.

41. The Committee recommends that the State party:

Undertake independent, participatory and periodic impact assessments of the extraterritorial effects of its financial secrecy and corporate tax policies on women's rights and substantive equality, ensuring that such assessments are conducted impartially, with public disclosure of the methodology and findings;

Strengthen its legislation governing the conduct of corporations registered or domiciled in the State party in relation to their activities abroad

5) Human Rights Law and Taxation

Human Rights Council

Working Group on the Right to Development, 2018
A/HRC/WG.2/19/CRP.1 - Indicators

(B1.1) Refrain from competitive taxation strategies as a means of attracting investors.

(B2.1) Require corporations whose activities are transnational to report publicly on a country-by-country basis, in order to expose major misalignments between the distribution of profit and the location of real economic activity.

(B3.1) Close tax havens which, thanks to bank secrecy laws, allow undeclared or illegally acquired assets or revenues to escape taxation, thus undermining the ability of all countries to broaden the tax base allowing for the collection of public revenue.

(B3.2) Strengthen tax administrations, by a targeted use of ODA.

pb@fieldtax.com

5) Human Rights Law And Taxation

General Assembly

United Nations A/HRC/55/54

General Assembly

Distr.: General 16 January 2024

Human Rights Council

Fifty-fifth session

26 February–5 April 2024

Agenda item 3

Promotion and protection of all human rights, civil, political, economic, social and cultural rights, including the right to development

Fiscal legitimacy through human rights: a principled approach to financial resource collection and allocation for the realization of human rights

Report of the Independent Expert on the effects of foreign debt and other related international financial obligations of States on the full enjoyment of all human rights, particularly economic, social and cultural rights, Attiya Waris

6) Taxation and Economic, Social and Cultural Rights

- Taxation provides resources to allow governments to fulfil their obligations to progressively realise economic, social and cultural rights. Taxation is often the major and most consistent resource.
- Taxation can provide a means of realising these rights – e.g. correcting discriminatory treatment
- BUT taxation may also impede the achievement of ESC rights
- A growing focus on taxation and ESC

6) Taxation and Economic, Social and Cultural Rights

International Covenant on Economic, Social and Cultural Rights

Article 2

1. *Each State Party to the present Covenant undertakes to take steps, <u>individually and through international assistance</u> and co-operation, especially economic and technical, <u>to the maximum of its available resources</u>, with a view <u>to achieving progressively the full realization of the rights recognized in the present Covenant</u> by all appropriate means, including particularly the adoption of legislative measures.*

- The obligation to maximise resources
- The obligation of international cooperation

6) Taxation and Economic, Social and Cultural Rights

International Covenant on Economic, Social and Cultural Rights, Art 2(1)

- The obligation of international cooperation
  - The obligation to provide assistance (economic and technical)
  - The obligation to refrain from conduct that may impede the maximization of resources

6) Taxation and Economic, Social and Cultural Rights

CESCR Concluding Observations: Switzerland 2019 **E/C.12/CHE/CO/4**

International cooperation for maximum available resources

12. The Committee takes note of the State party's efforts to combat cross-border tax evasion and its achievements in this regard. It notes with concern, however, that illicit financial flows from third countries continue to be placed in financial institutions in the State party, thereby curtailing the availability of financial resources vital for the realization of economic, social and cultural rights in those countries

13. The Committee recommends that the State party take strict measures to combat tax evasion, in particular by corporations and high-net-worth individuals, and intensify its efforts to address global tax abuse, including by ensuring that public and private financial institutions are subject to appropriate regulation as part of efforts to combat fraud and tax evasion schemes.

7) Concluding Comments

- Importance of understanding the relationship between taxation, taxpayers' rights and human rights
- The protection of taxpayers' rights is relatively well advanced
- Some aspects of the role of taxation in the fulfilment of human rights (especially economic, social and cultural rights) are significantly underdeveloped
- There is a knowledge gap for both tax experts and human rights experts
- The UN has a crucial role to play in devolving knowledge and clarifying the relationship of taxation and HRs

pb@fieldtax.com

FIELD COURT TAX CHAMBERS

Taxation, Taxpayers' Rights and Human Rights

Copenhagen Business School
November 21st 2024

PHILIP BAKER KC
Field Court Tax Chambers
3 Field Court, Gray's Inn
London WC1R 5EP
Visiting Professor, Oxford University
e-mail: pb@fieldtax.com

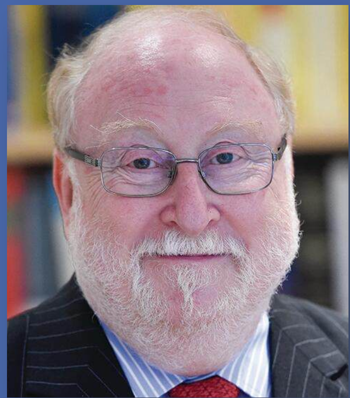
Panel Discussion

Jakob Bundgaard

CORIT Advisory

Elin Sarai

NHH Norwegian School of Economics



Philip Baker

Field Court Tax Chambers

Dirk-Jan Sinke

Dutch Business Confederation VNO-NCW

CBS

NTRC Nordic Tax Research Council

slido

Please download and install the Slido app on all computers you use

Which type of tax measure would most help the Nordics advance the green transition?

ⓘ Start presenting to display the poll results on this slide.

slido

Please download and install the Slido app on all computers you use

Should taxpayers' rights be prioritized more in the design of international tax standards?

ⓘ Start presenting to display the poll results on this slide.

slido

Please download and install the Slido app on all computers you use

Could the EU’s strict anti-avoidance rules become a competitive advantage for the Nordics?

ⓘ Start presenting to display the poll results on this slide.

slido

Please download and install the Slido app on all computers you use

What is the biggest factor preventing Danish unicorns from staying in Denmark?

ⓘ Start presenting to display the poll results on this slide.

CBS COPENHAGEN BUSINESS SCHOOL

NTRC Nordic Tax Research Council

CBS INTERNATIONAL TAX CONFERENCE 2024

EQUIS ACCREDITED AACSB ACCREDITED AMBA ACCREDITED CEMS PIM

CBS