

IIPF PhD School 2014

International Corporate Taxation

Co-organized with:

CESifo, Munich

MaTax at ZEW, Mannheim and the University of Mannheim

Office of Tax Policy Research, University of Michigan

Oxford University Centre for Business Taxation

Exeter College, Oxford

September 8-12, 2014

Convenors:

Michael P. Devereux

Michael Keen

Programme

Aims - to discuss questions and methodology on the current research frontier

- *What questions are important?*
- *What questions are interesting?*
- *How can they be addressed?*
- *The state of theoretical and empirical work*
- *Examples of first-class work*
- *Participants' work in progress and ideas*
- *Policy issues – how do we address them within a research environment?*

Monday, September 8

12.30 - 2.00 *Registration and Lunch*

2.00 - 2.45 **Introductions**

2.45 - 4.30 **The current international tax framework**

- Residence/source, double tax treaties, transfer pricing rules, thin cap rules, CFC rules, etc
- Challenges: avoidance, digital economy

4.30 - 5.30 **The policy context**

- Trends in corporate taxation
- OECD BEPS Action Plan
- Developing country perspective
- Coordination: Regional, role of OECD, UN, European Commission

Refreshments served at around 3.30

Dinner at Exeter College

Tuesday, September 9

9.00 - 12.30 **Elements of corporate tax analysis**

- Production efficiency (*Diamond and Mirrlees, Keen and Wildasin*)
- How to achieve: Taxing rent, cash flow tax, ACE
- Debt and equity, ACE, CBIT
- Marginal and average tax rates and their applicability
- Basic theory on incidence
- Dividends and personal taxes
- Extractive industries
- How are developing countries different

Refreshments served at around 10.30

12.30 - 2.00 *Lunch*

2.00 - 3.30 **Review of empirical approaches to estimating behavioural effects**

- brief historic review focusing on international issues
- data-driven developments
- focus on identification

3.30 - 4.00 *Refreshments*

4.00 - 5.30 **Student presentations**

Martina Baumann (Hohenheim) "The Global Effects of R&D Tax Incentives: Evidence from Micro-Data", with Bodo Knol and Nadine Riedel

Simon Bösenberg (ETH Zurich) "R&D tax incentives and the emergence and trade of ideas", with Peter Egger

Hung Lai (Wuppertal) "Real Effects of Fiscal Policy: Evidence from German Bonus Depreciation", with Sebastian Eichfelder and Kerstin Schneider

Wednesday, September 10

9.00 - 12.30 **Tax competition**

- Theory of tax competition
- Competition over source, destination and residence taxes
- Preferential regimes
- Empirical approaches to tax competition

Refreshments will be served at around 10.30

12.30 - 2.00 *Lunch*

2.00 - 3.30 **Guest lecture on Tax Systems: Joel Slemrod**

3.30 - 4.00 *Refreshments*

4.00 - 5.30 **Student presentations**

Jumpei Ito (Chuo) "The impact of transfer pricing regulations on the location decisions of MNEs"

Julia Merz (Cologne) "Profit Shifting and Tax Response of Multinational Banks" with Michael Overesch

Maximilian Todtenhaupt (Mannheim) "Asymmetries in Consolidation Preferences and Tax Competition"

Thursday, September 11

9.00 - 10.30 **Reforming the international tax system?**

- Formulaic approaches
- Destination-based approaches
- Regional coordination

10.30 - 11.00 *Refreshments*

11.00 - 12.30 **Issues in empirical research**

For example papers see reading list

12.30 - 2.00 *Lunch*

2.00 - 3.30 **Issues in theoretical research**

For example papers see reading list

3.30 - 4.00 *Refreshments*

4.00 - 5.30 **Student presentations**

Daniel Reck (Michigan) “Credit-Card Information Reporting and Small-Business Tax Compliance” with Joel Slemrod, Brett Collins, Jeffrey Hoopes and Michael Sebastiani

Fatih Yilmaz (Calgary; Baku) “VAT Treatment of Financial Institutions: Implications for the Real Economy”

Zarko Yordanov Kalamov (University of Technology Berlin) “Tax Competition as an Automatic Stabilizer under Balance of Payments Crises”

Dinner at 4500 Miles from Delhi (Indian restaurant)

Friday, September 12

9.00 - 10.30 **Unallocated time**

10.30 - 11.00 *Refreshments*

11.00 - 12.30 **Whither research on international corporate taxation?**

- Topics?
- Theory?
- Data?
- Empirical approaches?

12.30 *Close*