

NAVIGATE

foreign lands with us



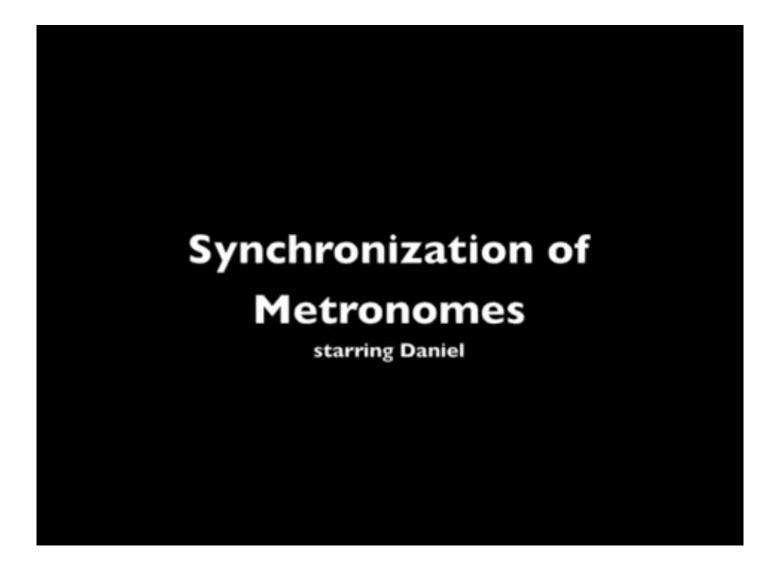
Ramazan Bicer

Robert de Liefde









Law of Entrainment

Christiaan Huygens / 17th century

Power

Proximity

Exchange

New Order

Applies in world of taxation too

Video link: https://www.youtube.com/watch?v=Aaxw4zbULMs



Global Tax Re-Set - it's working!

Aim

Collect USD 240 bio+ / annum

OECD BEPS Project

• "MLI"

• "CRS"

• "UBO Registers"

• 15% Minimum Tax

• EU "ATAD 3

• EU "DAC 6"

140+ nations / 15 Action Programs

Blanket change of Tax Treaties

Automatic Exchange of bank account info

Enforcement of Public Transparency

for Large Enterprises

De-shell Europe from Holding Co's

Advisors must report Tax Planning

"MLI" Treaty Transformation

- Since 2019 over 100 nations joined in
- Rapid change of 2800+ tax treaties
- Principal Purpose Test
 - Attacks empty Holding Co's
 - Introduces subjectivity and uncertainty
 - Increased Tax Audit risk



"CRS" – exchange of banking information

Gains momentum since 2014

Automatic exchange of bank information – cross border

In scope are Individuals and certain Entities

Turkey and the Netherlands joined in

Turkey pressured with EU Black Listing

"UBO"

Public registers on who owns what

How Taxes are collected from such registries?

Controlled Foreign Company Rules

CRS Bank Information exchange

Self reporting on tax planning (DAC 6)

+

Curb Shell Companies (ATAD 3)



15% Minimum Tax Rate

Consolidated revenues over Euro 750 million

Entity by Entity re-calculation

If below 15% (based on Globe Rules) pay more

Serious Compliance Burden

Re-Think of Business Model



De-shelling Europe

- EU Directive "ATAD 3" targets abuse of Shell Companies
 - Pass-through revenue streams
 - > 60% foreign assets
 - Outsourced daily company management
 - < 5 qualified permanent staff residing at commutable distance
- Ter Haar Report October 2021
- Self-reporting to get taxed
 - Retro-active effect to 1-1-2022



Game on!

OECD "Securing a global level playing field"

Collection on USD 200+ billion

Tax Competition is not ending

- We are left with Tax Risk and Opportunity
 - SME's
 - Large and Global Groups
 - Individuals







Kingdom of the Netherlands

Towards Acceptable Flow Through

Bound by EU Directives

Early Adopter of OECD rules

Scrutiny on BV status

Opportunities within the Kingdom

Republic of Turkey

UBO Registry

Grey Listed for Finance Regulatory

Late Adopter of OECD Rules

BV's need NL staff and organisation

Investors to reconsider Tax Approach

Growth through Compliance

Transformation in motion – it is time to respond

• Tax Benefits require "Economic Substance"

Enforced Transparency gradually becomes the norm

• Like in martial arts, lean in to capture opportunity

• Shift the Mindset on Tax Strategy and Compliance









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