



BUILDING A GROWTH-FRIENDLY TAX ENVIRONMENT

Raising Tax Certainty Virtual Seminar

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Tax certainty and dispute prevention or resolution

Prof. Guglielmo Maisto
Founding Partner
Maisto e Associati



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Framework of advance tax rulings procedures



Scope: (i) interpretation of unclear statutory provisions, (ii) eligibility for specific tax regimes, (iii) application of anti-avoidance rules

Filing of the request

Prior to filing the tax return affected by the ruling application

Tax ruling outcome

Mandatory deadline for the reply. Deemed positive reply in the absence of a timely response



Improving treaty Competent Authorities' procedures

- ❖ Mandatory time limit for confirming admissibility of MAP application and APA or BAPA
- ❖ Suspension of tax collection when MAP is initiated
- ❖ Suspension of tax litigation when MAP is initiated
- ❖ Guidance by CAs on lifting or determination of penalties



Mirror domestic dispute resolution rules for Pillar 2 or non-treaty situations



Reflecting Article 25 OECD Model Convention

Subject to reciprocity

Put it in motion upon taxpayer's request in each jurisdiction

Implemented regardless of time limits



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THANKS