

ZEW Mannheim, University of Mannheim and Oxford University Centre for Business Taxation

Taxing Multinational Firms

November 18 – 19, 2013 in Mannheim, Germany

Programme



November 18, 2013

10:00-10:30	Registration	Conference Office
10:30-10:45	Welcome Clemens Fuest	Room Brüssel
10:45-12:45	<p>Session 1a: Profit Shifting (1) <i>Chair: Christoph Watrin</i></p> <p>Profit Shifting: Drivers and Potential Countermeasures Sebastian Beer (WU Vienna University of Economics and Business) Discussant: Christoph Watrin</p> <p>Multinationals, Profit Shifting and Trade Unions Sebastian Siegloch (Institute for the Study of Labor Bonn) and Martin Simmler (DIW Berlin) Discussant: Sebastian Beer</p> <p>Taxing Multinationals in the Presence of Internal Capital Markets Michael Stimmelmayer (University of Munich and CESifo) Discussant: Martin Simmler</p> <p>Do Multinational Firms Use Complex Group Structures to Facilitate Income Shifting and Repatriation? Christoph Watrin (University of Muenster) Discussant: Michael Stimmelmayer</p> <p>Session 1b: Tax Competition <i>Chair: Eckhard Janeba</i></p> <p>Testing Tax Competition Celine Azemar (University of Glasgow) Discussant: Andreas Hoefele</p> <p>Wages and International Tax Competition Sebastian Krautheim (Goethe University Frankfurt) Discussant: Celine Azemar</p> <p>Does tax competition make mobile firms more footloose? Andreas Hoefele (Loughborough University) Discussant: Johannes Becker</p> <p>Bidding for Firms with Unknown Characteristics Johannes Becker (University of Muenster) Discussant: Sebastian Krautheim</p>	Room Brüssel
12:45-14:00	Lunch	Room 2

14:00-16:00 **Policy Roundtable on aggressive tax planning and potential measures** Room Brüssel
Introductory Speech: Christoph Spengel
Participants:
• Ina Schlie (Head of Global Tax at SAP)
• Katharina Becker (Federal Ministry of Finance)
• Michael Devereux (Director of Oxford University Centre for Business Taxation)
• Clemens Fuest (President of ZEW)
• Heinz-Klaus Kroppen (Partner at Deloitte)
• Michael Schaden (Partner at Ernst & Young)
• Gregory Abate (OECD)
Moderation: Christoph Spengel

16:00-16:30 **Coffee Break**

16:30-18:30 **Session 2a: Anti-Tax-Avoidance and ECJ rulings** Room Brüssel
Chair: Alfons J. Weichenrieder
Do Firms React to the Existence and Closing of Tax Havens with Location Decisions?
Robert Ullmann (University of Muenster)
Discussant: Alfons J. Weichenrieder
Are anti-tax-avoidance measures effective? Profit shifting to European tax havens after the Cadbury-Schweppes case
Carolin Holzmann (FAU Erlangen-Nuremberg)
Discussant: Robert Ullmann
CFC Legislation, Passive Assets and the Impact of the ECJ's Cadbury-Schweppes Decision
Alfons J. Weichenrieder (Goethe University Frankfurt)
Discussant: Carolin Holzmann

Session 2b: Corporate Finance and Governance Room 2

Chair: Jost Heckemeyer

The effects of thin capitalization rules when firms are financially constrained

Mohammed Mardan (University of Munich)

Discussant: Uwe Scheuering

M&A and the Tax Benefits of Debt Financing

Uwe Scheuering (ZEW)

Discussant: Mohammed Mardan

Heterogeneity in Tax Motivated Internal Debt Financing and Its Impact on Corporate Investment

Martin Simmler (DIW Berlin)

Discussant: Jost Heckemeyer

Taxation and Corporate Debt: Are Banks Any Different?

Jost Heckemeyer (University of Mannheim)

Discussant: Martin Simmler

19:30 **Conference Dinner at ZEW**

Programme



November 19, 2013

08:00-10:00	<p>Session 3a: Transfer Pricing <i>Chair: Clemens Fuest</i></p> <p>Transfer Pricing, Vertical Integration and Production Externalities: Implication on Profits and the Arm's Length Principle Yaron Lahav (Ben-Gurion University of the Negev) Discussant: Pia Vollert</p> <p>Should multinational companies request an Advance Pricing Agreement (APA) – or shouldn't they? Pia Vollert (University of Paderborn) Discussant: Clemens Fuest</p> <p>A Negotiation-Based Model of Tax-Induced Transfer Pricing Johannes Becker (University of Muenster) Discussant: Yaron Lahav</p> <p>Risk Transfer Valuation in Advance Pricing Agreements between Multinational Enterprises and Tax Authorities Zvika Afik / Yaron Lahav (Ben-Gurion University of the Negev) Discussant: Johannes Voget</p>	Room Brüssel
	<p>Session 3b: Taxation of Intangibles and Formula Apportionment <i>Chair: Lisa Evers</i></p> <p>Formulary Apportionment and the Taxation of Income from Intangible Assets Richard Sansing (Tuck School of Business at Dartmouth) Discussant: Lisa Evers</p> <p>The CCCTB option – an experimental study Andreas Oestreicher (University of Göttingen) Discussant: Philipp Dörrenberg</p> <p>Intellectual Property Box Regimes – Effective Tax Rates and Tax Policy Considerations Lisa Evers (ZEW) Discussant: Richard Sansing</p>	Room 2
10:00-10:30	Coffee Break	
10:30-12:00	<p>Session 4a: Profit Shifting (2) <i>Chair: Katharina Finke</i></p> <p>Does a Common Set of Accounting Standards Affect Tax-Motivated Income Shifting for Multinational Firms? Lisa De Simone (Stanford Graduate School of Business) Discussant: Nadine Riedel</p> <p>Do Transfer Pricing Laws Limit International Income Shifting? Evidence from European Multinationals Nadine Riedel (University of Hohenheim) Discussant: Katharina Finke</p> <p>Tax Avoidance of German Multinationals and Implications for Tax Revenue – Evidence from a Propensity Score Matching Approach Katharina Finke (ZEW) Discussant: Lisa De Simone</p>	Room Brüssel

Session 4b: FDI, Trade and Taxes

Chair: Christopher Balding

Taxes and FDI: Evidence from Cross-Border Acquisitions

Nils Herger (Study Center Gerzensee)

Discussant: Arjan Lejour

Treaty shopping and FDI flows

Arjan Lejour (CPB Netherlands Bureau for Economic Policy Analysis)

Discussant: Christopher Balding

Asymmetric Trade Estimator in Modified Gravity: Corporate Tax Rates and Trade in OECD Countries

Christopher Balding (Peking University HSBC Business School)

Discussant: Nils Herger

12:00-13:00 Lunch

13:00-14:00 **Keynote Lecture:**
International Taxation and Multinational Firm Leverage
Harry Huizinga (Tilburg University)

Room Brüssel

14:00-14:15 Coffee Break

14:15-15:45 **Session 5: Optimal Taxation**

Chair: Martin Ruf

Room Brüssel

Should tax policy favor high- or low-productivity firms?

Dominika Langenmayr (University of Munich)

Discussant: Giorgia Maffini

Taxation and investment of small and medium sized companies: evidence from UK tax returns

Giorgia Maffini (Oxford University CBT)

Discussant: Martin Ruf

Optimal Taxation of International Mergers & Acquisitions

Martin Ruf (University of Tübingen)

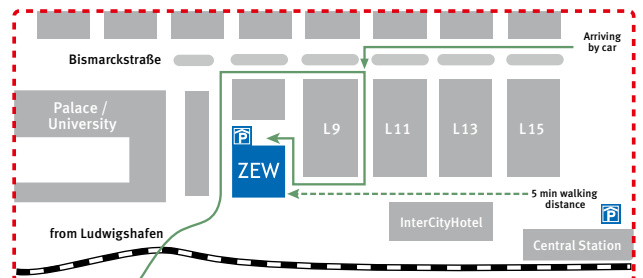
Discussant: Dominika Langenmayr

15:45-16:00 **Closing Remarks**
Friedrich Heinemann

Room Brüssel

Arrival in Mannheim

The ZEW Location



Walking to ZEW from Mannheim Central Station (approx. 5 minutes)

When leaving the central station, walk across the tram tracks and then turn left. Now keep straight for approx. 300 metres; you will see a modern, cream-coloured building with blue window-frames right in front of you – the ZEW-building.

Walking to ZEW when arriving with the Airport Shuttle (approx. 7 minutes)

Go straight ahead towards the central station and then turn right at the junction. Now walk along the street until you reach the pedestrian's traffic light between L 9 and L 11. Cross the road and keep straight.

Turn right at the corner, and you will see a modern, cream-coloured building with blue window-frames right in front of you – the ZEW-building.

ZEW via Frankfurt Airport

You can reach Mannheim from the Frankfurt Airport (FRA) with the ICE train in 30 minutes or by car in 60 minutes.