

# ANU Tax and Transfer Pricing Institute Roundtable 20 July 2016

## Global Corporate Tax – Anti Abuse/Transparency/Co- operative compliance

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# Transparency Comments

## Current Disclosure by ATO

- \* Revenue/Taxable Income/Tax Paid

- \* Practical Challenges – Australian based coys v inbound

## Voluntary Transparency Code

- \* Significant additional work (note CbC reporting impact on resources)

- \* Impact if don't opt in – “name & shame”/code becomes mandatory

**More transparency BY taxpayers should be balanced by more certainty FOR taxpayers**

# Other Comments

## Co-operative Compliance

- \* GE Relationship with ATO (PCR/Rulings etc)
- \* ATO Resources (Rulings/APA's/Support for Cooperative Compliance/Treaty Disputes – Double Taxation)

## Anti Abuse Rules

- \* Part IVA/TP
- \* MAAL
- \* DPT



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