

Call for Papers

47th Academic Symposium of the Gesellschaft für Unternehmensgeschichte e.V.

«Tax management and competition in the past and the present»

10th and 11th October 2024

at Swiss Life AG, General-Guisan-Quai 40, 8022 Zürich

Tax management has become a booming field of activity in recent decades. Meanwhile, there are separate courses of study for tax management, a flourishing market for consulting services as well as special departments within companies. The growing importance of tax management is on the one hand a reaction to the increasing complexity of the financial and tax world. The number of standards to be taken into account has risen disproportionately. On the other hand, rapidly advancing globalisation has created more and more international corporate structures, which entail tax complications, but also tax structuring opportunities.

More than ever before, the aphorism attributed to the banker Meyer A. Rothschild (1744–1812) about the consequences of tax law knowledge applies: «Ignorance of tax laws does not exempt one from the obligation to pay taxes. Knowledge, however, often does.» This is where tax management and tax structuring, tax optimisation and tax avoidance come in. They refer to the use of legal possibilities to reduce the tax burden and require specialised professional knowledge.

Tax management can start with accounting, methods of valuation, depreciation and the offsetting of losses over several years. The choice of the legal form of a company can have direct tax implications. The regional choice of location plays a role, as in Germany the assessment rates for trade tax vary considerably depending on the municipality, while in Switzerland, the tax laws of the cantons differ significantly in some cases. This applies even more to the international choice of location, which is often influenced by the tax differentials between different countries. In particular, it can be influenced by considerable settlement premiums in the form of tax breaks. It is not unusual for large companies to be able to choose between many locations in different countries and to therefore be in a strong negotiating position. Often, activities are deliberately relocated to low-tax countries in order to achieve a low tax burden, for example on patent income. Transfer prices for intra-group international transactions can also be structured in such a way that the tax burden in high-tax countries is reduced. Traditional tax havens such as various Caribbean island states, the Cayman Islands or Delaware also play an important role in international tax structuring. Another common practice is the establishment of intra-group financing companies in countries with low tax rates. As a result of the intra-group lending and the associated interest payments, the profits then accrue in the low-tax country.

The conference will examine the causes and development phases of tax management. The focus will be on national and international regulatory norms, but also on entrepreneurial practices. Both seem to be directly interrelated. In particular, case studies from companies, which have been rare up to now, are in demand. Tax advisors, auditors and lawyers are also important actors. The perspective of the state is also essential. How does it react to tax optimisation strategies? Tax management is not an isolated phenomenon, but is related to other contexts. In the 20th century, it was the fear of confiscation and receivership in hostile countries that brought about complex international corporate structures with significant tax implications. The protection of property was sometimes more important than tax savings, but at other times the two motives went hand in hand.

Please submit proposals for papers together with a short abstract (max. 3,500 characters) **and a short CV** to Dr. Andrea Schneider-Braunberger (ahschneider@unternehmensgeschichte.de) **by 20 January 2024**.

The organisers Prof. Dr. Hartmut Berghoff (Berghoff@uni-goettingen.de), Prof. Dr. Jan-Otmar Hesse (Jan-Otmar.Hesse@uni-bayreuth.de) and Prof. Dr. Tobias Straumann (tobias.straumann@uzh.ch) are available to answer any questions.