

Are you ready

to talk EU tax law?

If you are, we are!



pwc

EU Direct Tax Group (EUDTG)

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Since 2005, our group has developed a wealth of practical and technical expertise in interpreting and applying EU law.

Do you need EU law advice on EU Directives, business tax reform, digital and minimum taxation, the EU's recovery strategy, the EU's blacklist or OECD BEPS 2.0?

Or maybe you just want to know what DAC6, DAC7 or CCTB means to your business?


.... or the public debate about aggressive tax planning?

.... or do you need EU litigation support?

EUDTG is PwC's pan-European network of EU law experts. We specialise in all areas of direct tax, including the fundamental freedoms, EU directives and State aid rules. You will be only too well aware that EU direct tax law is moving quickly, and it's difficult to keep up. But, it is crucial that taxpayers with an EU or EEA presence understand the impact as they explore their activities, opportunities and investment decisions.

So how do we help you?

- Our experts combine their skills in EU law with specific industry knowledge by working closely with colleagues for instance in the Financial Services and Real Estate sectors.
- We have set up EUDTG standing and ad hoc working groups on hot topics such as State aid, ATAD, DAC6, EU Blacklist, C(C)CTB and the OECD Inclusive Framework on BEPS.
- Through our internal PwC EUDTG Technical Committee we continuously develop new and innovative EU law positions and solutions for practical application by clients.
- We provide EU law technical support to PwC's input to the international tax debate.
- We closely monitor EU direct tax policy-making and political developments on the ground in Brussels and have excellent contacts with EU and OECD tax policy-makers.
- We provide technical support where requested to the "EBIT" EU business advocacy initiative, which PwC facilitates as Secretariat. See also <http://www.ebit-businesstax.com>

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- Our secretariat based in the Netherlands and Brussels coordinates the EUDTG Network on a daily basis and operates an EU tax news service keeping our clients up to date on the very latest EU tax developments.

And what specific experience can we offer?

- We advise clients on the implications of and compliance with EU legal acts and proposals, e.g. Directives such as: ATAD 1 & 2, DAC 2-7 (incl. tax rulings, CbCR, tax arrangements) and EU law aspects of OECD BEPS.
- Our State Aid Working Group members help our clients identify and manage EU State aid risks and we continue to assist clients in a number of the ongoing State aid cases concerning tax rulings and tax regimes.
- Together with our Financial Services colleagues, we have assisted foreign pension funds, insurance companies, and investment funds with their dividend withholding tax refund claims.
- We have assisted clients before the CJEU and the EFTA Court in a number of high-profile cases such as: *Marks & Spencer*, *Aberdeen*, *X Holding BV*, *Gielen*, *X NV*, *A Oy*, *ArCade Drilling*, *SCA*, *X (C-87/13)*, *Kieback (C-9/14)*, *Sofina (C-575/17)* and, more recently, the 'Danish beneficial ownership cases'.
- We have carried out a number of tax research studies for the European Commission.

And, importantly, who are our people?

We have more than 70 dedicated people working in client service teams across Europe. They stand ready to assist you with EU law in your own jurisdiction and in your own language. They are ready to talk!

Many of our EU direct tax professionals are also university professors and lecturers, who are at the forefront of developments and who regularly author books and articles on international and EU tax law.

Do you need to optimise your EU tax position and strategy?

Maybe you need assistance with managing your State aid risks or filing EU law complaints or claims for tax refunds?

.... or do you need EU public affairs support?

Or do you need help to check where you might be in breach of EU law?

If any of these apply, then our EU Direct Tax Group (EUDTG) is ready and willing to talk!



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