

Copenhagen Research Group on International Taxation (CORIT)



Newsletter no. 1, January 2010

It is our pleasure to present to you the official quarterly newsletter of the Copenhagen Research Group on International Taxation (CORIT). We hope you have had the opportunity to visit CORIT's official website: www.corit.dk. Please find a brief description of CORIT's research themes and its activities below.

We welcome any proposal for increased cooperation with research institutions and businesses and encourage you to spread the word. We invite you and your contacts to join our CORIT network on linkedin.com and to take full advantage of our website.

What is CORIT?

CORIT started as a specialized research group at Copenhagen Business School (CBS) within the field of international taxation. CORIT aims to promote cross-disciplinary tax research. Such a group is to our knowledge the first of its kind in Scandinavia and one among few in Europe. CORIT is inspired by successful centers at renowned universities around the world. CORIT is cross-disciplinary by nature and thus encompasses existing competencies at CBS within the research areas of:

- International Tax Policy
- Tax management
- International Tax Law

CORIT members include highly skilled researchers specializing in all the above areas, both from a financial perspective and a law perspective ([click for more](#)). Further Danish and foreign professors and practitioners with significant experience and knowledge on international tax law and policy have been invited to participate as associated partners ([click for more](#)).

The CORIT Website

To support the objectives of CORIT, we have launched the CORIT website. The website is updated weekly with news about CORIT and the research areas of CORIT. See immediately below for an overview of some of the most recent news.

News

We have i.a. announced the following news-stories:

- The OECD has proposed revisions to the OECD Transfer Pricing Guidelines ([click for more](#))
- Tax Risk Management is becoming increasingly important to MNEs ([click for more](#))
- PhD project overview at CORIT ([click for more](#))

Publications

The CORIT website also contains a wide variety of publications and presentations. The publications are made by CORIT members within the areas specifically addressed by CORIT and are made available free of charge with the kind cooperation of the publishers ([click for more](#)).

Recent articles such as the following can be downloaded from the website:

- Bulletin for International Taxation, March 2009 (IBFD): The Transactional Ghost of Article 9(1) of the OECD Model by Jens Wittendorff. ([click to read](#))
- Tidsskrift for Skatter og Afgifter, 27 May 2009 (Danish): Overskudsafhængige lån - Om udformning, økonomiske rationaler og den mangelfulde skatteretlige regulering by Jakob Bundgaard and Katja Joo Dyppel. ([click to read](#))
- Tidsskrift for Skatter og Afgifter, 8 July 2009 (Danish): Investeringselskaber by Jakob Bundgaard. ([click to read](#))
- Commodity Taxation and Parallel Imports, 10 July 2009, by Pascal Raimondos-Møller and Nicolas Schmitt. ([click to read](#))
- Bulletin for International Taxation, July 2009 (IBFD): Corporate Tax Implications of Denmark's Unilateral Termination of its Tax Treaties with France and Spain by Jakob Bundgaard and Katja Joo Dyppel. ([click to read](#))
- International Transfer Pricing Journal, July/August 2009: OECD Discussion Draft on Transfer Pricing Aspects of Business Restructurings: Summary of Business Comments and Issues for Discussion by Giammarco Cottani. ([click to read](#))
- Tidsskrift for Skatter og Afgifter 16 September 2009 (Danish): Carried interest i private equity- og venturefonde - Internationale strømninger slår igennem til dansk ret by Jakob Bundgaard. ([click to read](#))

Discussion paper series

Please know that CORIT has released its own CORIT Discussion paper series which analyses current tax issues from a theoretical and practical point of view. So far the Discussion paper series includes the following:

- Discussion paper no. 1: Tax Treaties and Tax Avoidance by Jakob Bundgaard and Peter Koerver Schmidt ([click to read](#))
- Discussion paper no. 2: IRS Proposed Transfer Pricing Regulations by Stuart Webber ([click to read](#))
- Discussion paper no. 3: The Income Tax Efficient Supply Chain by Stuart Webber ([click to read](#))

- Discussion paper no. 4: Optimizing the Framework Conditions for Renewable Energy and Cleantech Solutions Using Grants, Feed-in Tariffs and Tax Incentives - A project Outline by Jakob Bundgaard ([click to read](#))
- Discussion paper no. 5: Tax Neutrality in Corporate Financing by Jakob Bundgaard and Michael Tell ([click to read](#))
- Discussion paper no. 6: Classification and Treatment of Hybrid Financial Instruments and the Remuneration thereon under EU Corporate Tax Directives by Jakob Bundgaard ([click to read](#))

Presentations

Further presentations from CORIT members attending conferences etc are also made available. Please feel free to visit the website and download our publications and presentations ([click for more](#)).

Activities at CORIT

In order to support the achievement of the overall objectives of CORIT, further activities are planned beside the research itself such as a series of international tax law and tax policy conferences, workshops and lectures. We intend to arrange exploratory workshops with the participation of external parties. The first conference of CORIT will be announced in 2010 and is to be held in Copenhagen in 2010. Further information will follow.

Next issue

The next issue of the CORIT newsletter will i.a. address our visiting scholar program, ongoing research projects of CORIT and our sponsorship opportunities.

On behalf of CORIT



Katja Joo Dyppel, Jakob Bundgaard, Christian Plesner Rossing and Michael Tell

Please know that the CORIT newsletter is issued quarterly, but news, publications etc. are uploaded on a weekly basis to the website. To subscribe/unsubscribe the CORIT newsletter, please go to www.corit.dk