

Copenhagen Research Group on International Taxation (CORIT)



Newsletter No. 2, June 2010

It is our pleasure to present the second issue of the newsletter of the Copenhagen Research Group on International Taxation (CORIT).

CORIT aims at conducting tax research and to contribute to the business community by making tax research widely available. Inspired by successful centers at renowned universities around the world CORIT is to our knowledge the first of its kind in Scandinavia. CORIT members include recognized researchers and practitioners specializing in international tax issues ([learn more](#)). The CORIT network is expanding and the CORIT website (www.CORIT.dk) recently passed 5.000 visitors from all over the world.

New publications

We are proud to present the following recent publications. To our international subscribers we excuse that that some of the publications are written in Danish.

Tax neutrality in Corporate Financing by Jakob Bundgaard & Michael Tell (English)

The latest issue of European Tax Studies (no. 1/2010) is now online on ste.seast.org/en and is dedicated to company tax financing neutrality. CORIT has contributed with the article "Tax Neutrality in Corporate Financing" by CORIT members Jakob Bundgaard and Michael Tell, which analyses the present Danish tax regime regarding corporate financing. The issue has more than fifteen articles and each of them will be published in English, Italian and Spanish. ([Download the article](#))

The Object of Art. 9(1) of the OECD Model Convention: Commercial or Financial Relations by Jens Wittendorff (English)

This article examines two dimensions of the concept of a controlled transaction under Art. 9(1) of the OECD Model. The first part is an examination of the basic object qualification under Art. 9(1), treaty-based limits on the object qualification and the OECD position. Second, the delimitation of the controlled transaction for purpose of the arm's length test under Art. 9(1) is examined. ([Download the article](#))

Management fees in the private equity and venture sector by Jakob Bundgaard (Danish)

This article examines the development in recent Danish case law and legislation in terms of the deductibility of management fee's in the private equity and venture sector. ([Download the article](#))

Beneficial Ownership by Jakob Bundgaard (Danish)

The article examines the recent developments with respect to the notion of beneficial ownership and cross border dividend payments. More precisely, the first Danish case on the issue is commented. ([Download the article](#))

Danish Anti Abuse legislation and its conformity with the Parent-/Subsidiary Directive by Jakob Bundgaard (Danish)

This article examines a recently introduced anti abuse provision in Danish tax law regarding the interposition of holding companies to obtain tax exemption on dividends and capital gains on shares in the light of the parent-/subsidiary directive. ([Download the article](#))

Please visit www.corit.dk to read and download more articles.

Forthcoming book on Private Equity funds

CORIT member Jakob Bundgaard has authored a book on the tax law aspects of private equity funds. We will inform you when the book is released.

CORIT Lab is now a reality

Since the beginning of CORIT, we have worked hard to establish a CORIT Lab from where CORIT PhD Scholars and other CORIT researchers can conduct their research in an international tax research environment. From February 2010 the CORIT Lab became a reality. Three PhD Scholars of CORIT are now placed in the CORIT Lab at the CBS Law Department. Jakob Bundgaard says: *"this event marks the beginning of the next level of CORIT. Being able to attract very skilled and promising ph.d.-scholars within the field of international tax law and at the same time create a nourishing research environment, gives us high expectations for the future."*

CORIT expands the partner network

The CORIT partner network consists of highly skilled associated researchers from all over the world with similar interests to those of CORIT.

[For a complete overview of the CORIT partner network click here](#)

On behalf of CORIT



Jakob Bundgaard and Michael Tell

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