



# INDIRECT TAX **LEADERS**

THE COMPREHENSIVE GUIDE TO THE WORLD'S LEADING INDIRECT TAX ADVISERS

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# Introduction

Welcome to the ninth edition of the *Indirect Tax Leaders* guide from *World Tax*. This is a publication of the list of the world's leading indirect tax practitioners and is the most comprehensive edition yet, as we continue to grow the guide in both scope and scale. It covers more jurisdictions, reaches out to more individuals and recognises more practitioners than ever before – from rising stars just making a name for themselves to market leaders with decades of experience behind them.

This year alone we reached out to more than 10,000 leading tax professionals from around the globe to gather their feedback about their markets and the individuals that stand out in them. The *Indirect Tax Leaders* guide now includes the names of almost 840 experts from jurisdictions in every corner of the world.

These individuals are nominated by their peers and recommended as trusted advisers. We ask professionals to name the people they would refer their clients to in the event of a conflict, or recommend as a local representative in another jurisdiction. And all those named in the guide have received recommendations from different practitioners. The resulting list is therefore a collection of indirect tax leaders recognised – by the leading names in their own and international markets – as those who perform strongest in their field. Market leaders chosen by market leaders.

As part of our extended coverage we also offer online profiles for those included this year. These allow practitioners to showcase their work to clients, offer more information about their skills and experience and display feedback collected by our research team from a broad range of industries.

Our aim always is to progress the guide, reach out to more practitioners, receive feedback from more clients and provide coverage of more leaders from every market. We would like to thank those who took the time to provide feedback to help us put this guide together this year and would encourage everyone to do so in the future to ensure we are providing the broadest, most accurate assessment of the leaders in indirect tax that we can.



Jonathan Moore, Editor, *World Tax* and *World TP* 



Americas

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# **AMERICAS**

# Regional interview



Luiz Fernando Rezende Gomes

# What is the most significant change to your region's/ jurisdiction's indirect tax legislation in the past 12 months?

There was a great expectation that 2020 would be the year for Brazilian tax reform, an expectation that was frustrated, so far, mainly by the COVID-19 pandemic. Therefore, the main changes in the indirect tax legislation relate to the latest developments of leading cases and court disputes, especially on the PIS (Social Integration Program) and Cofins (Contribution for the Financing of Social Security) taxes. This includes the consolidation of precedents that helps companies recover the amounts related to their PIS and Cofins credits.

Also, there are some developments on the highly relevant case of the exclusion of the ICMS (State VAT) from the PIS and Cofins calculation basis. Most of the recent changes on this hot topic are based on positions adopted by tax authorities, taxpayers, and lower court cases, in a scenario that still awaits the final details on the application of the decision to be clarified by the Brazilian Supreme Court.

In strict connection with the COVID-19 pandemic, the main changes for indirect tax payments in Brazil only apply to federal taxes, with the postponement of due dates for PIS and Cofins payments. Also, some specific rates were reduced, specifically, for import duty and tax on manufactured products in cases where it was deemed vital for responding to the COVID-19 pandemic.

On the tax compliance side, in the framework of the COVID -19 pandemic, the main change in Brazilian indirect tax compliance was the postponement of due dates for delivering electronic files from April 2020 to July 2020.

# How do you anticipate that change impacting your work and the market moving forward?

Considering the consolidation in some precedents for PIS and Cofins, and the demand for cash triggered by the COVID-19 pandemic, there is a significant increase in assistance related to claiming tax credits. This demand, together with the needs of social distancing, will enhance the importance of the application of technology in all phases of work, not only for efficiency purposes now, but also to reduce health risks. This trend, which was already strong, will now be swiftly applied since the main resistance – more related to culture – was almost eliminated with most professionals working remotely.

# What impact do you see the COVID-19 pandemic having on your work, directly, and on the wider tax environment, in both the short and long terms?

One of the main changes will be making everything, including tax-related work, more digital. Even in regions were the digital trend is strong and began a long time ago, like Brazil and other Latin American (LATAM) countries, there is a clear speeding up of the adoption of technology in the tax environment. Various countries in the world (especially in Europe and Asia) migrating faster to the digital tax environment, and the cultural change of working remotely will push towards the next level of tax digital transformation faster than anticipated.

In the long term, we can anticipate that real-time reporting of tax and financial information may change to real-time information on actual economic events, such as manufacturing outflow or digital transactions reporting straight to tax authorities. We can already see some small examples of such procedures in certain European and LATAM countries. This will reduce the time of processing information to determine the tax due on transactions, decrease the number of potential errors, and simplify compliance processes.

# Given the likely long-term implications of COVID-19 on things like remote working and digital retail, how do you see tax technology developing to accommodate this new reality and where do you think the next area of focus might be?

Considering the changes in the business environment, undoubtedly, the level of sensitive information flowing in digital networks will increase dramatically. This sensitive information will also be vital for tax authorities and taxpayers, which will put pressure on balancing the level of detail needed to be informed and the required security of data handled in the digital environment. Regulations, such as the GDPR (General Data Protection Regulation) Europe, show the overall level of concern with the information security issue, and the number of cyber attacks reported reveals how fragile the digital environment security can be. Therefore, special focus will be given to properly securing the strategic information needed for tax payments and compliance, applying secure technology, but at a reasonable cost.

# What potential other legislative changes are on the horizon that you think will have a big impact on your region/jurisdiction?

Tax reform in Brazil is a fundamental structural change for the country, and the need for this change has reached a consensus level not seen in recent years. However, there is still discussion on what will be the nature and extension of this change, with two main projects being

#### Interview

discussed in the National Congress and several other suggestions being presented by non-governmental entities.

Although still very uncertain, one can speculate that changes will come in the simplification of indirect taxes mainly at the federal level, where some taxes and contributions will be merged into one single tax. Also, changes in corporate income tax may be included, in an attempt to align rates and some specific procedures (such as transfer pricing calculations) to international trends.

# What are the potential outcomes that might occur if those changes are implemented?

Besides the simplification of Brazil's tax system – arguably the most complex in the world – there will be a transition period from the current system to the new system that may take five to ten years, depending on which project is approved. There is no expectation of significant changes to the tax burden itself, even though it may shift from one economic activity to another – the objective being to keep the overall tax collection the same.

# Do you think that change will have a positive effect on both your practice and the wider regional/jurisdictional market?

Any change will have a negative short-term effect, mainly based on the uncertainty that a major modification will generate. In the mid-term and long-term, the change will be beneficial to the market since it will make doing business in the country more efficient and competitive. For the tax practice, a more efficient market will generate more opportunities and greater focus on value added work, making an impact in a very positive way.

# What legislative changes would you like to see implemented that you think would have the most positive effect on your practice and the wider regional/jurisdictional market?

The simplification of indirect taxation would have a very positive impact on the simplification of compliance requirements, reducing the exposure to tax accessory obligation risks. This simplification would help focus the tax practice on adding value to the business, streamlining business processes to reduce tax leakage, and increasing the value of operations planning with the participation of the tax function.

# Do you think something like that is likely to be implemented in the near future? Yes, partially implemented, specifically when it comes to simplifying federal indirect taxes.

# What have been the biggest developments in tax technology and where do you think the next area of focus might be?

The biggest development is the maturity level of analytics tools available, making it possible for tax professionals to use the massive data available to extract significant insights and manage tax risks proactively. The next area of focus would be to deploy the analytics capability to a broader database, made possible by the move to cloud Enterprise Resource Planning (ERP). The broader base will enable more advanced analyses, including running simulation scenarios ("before the fact") and allowing studies with supply chain and/or clients' data.

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Asia-Pacific

# **ASIA-PACIFIC**

# Regional interview



Richard Mackender

# What is the most significant change to your region's/ jurisdiction's indirect tax legislation in the past 12 months?

The biggest changes to indirect tax legislation have been the introduction of electronic supplies of services (ESS) indirect taxation rules, which subject offshore digital services suppliers to local on-shore indirect tax.

# How do you anticipate that change impacting your work and the market moving forward?

The rules in the region are diverse and varied, so affected companies need to keep up with the changes. A company serving customers across the region could end up having registration and reporting obligations in more than 10 countries, which increases the compliance burden for the indirect tax team. This sort of change means that companies need a networked firm that can bring them the details as they arise and can support them with advice and compliance solutions. Deloitte is ready to assist our clients and bring our wide network to enable the clients to be in the best position.

# What impact do you see the COVID-19 pandemic having on your work, directly and on the wider tax environment, in both the short and long term?

Certainly, we will be working from outside the office much more than before and so will our clients, so virtual meetings are likely to be the norm now. From a business and economic perspective, there has been a clear shift to digital, which means ESS rules are very important. We are also expecting to see companies revisiting their supply chain models and revising their footprint in the region, so there will be changes in

INDIRECT TAX LEADERS

#### Interview

the flow of goods and services into and around the region, as well as, changes in corporate structures. Companies will need advice on customs matters and registrations, as well as compliance requirements.

# Given the likely long-term implications of COVID-19 on things like remote working and digital retail, how do you see tax technology developing to accommodate this new reality and where do you think the next area of focus might be?

We expect that businesses will begin to look at their tax and finance functions, and look at how effective remote working is for these teams. That will likely drive greater focus on automation, analytics, and ERP functionality. Together with the coming move to cloud Enterprise Resource Planning (ERP), this is going to be a big area for indirect tax professionals over the next few years.

# What potential other legislative changes are on the horizon that you think will have a big impact on your region/jurisdiction?

We are expecting that, as governments look at their debt levels, they will need to raise money. Tax rates, and especially indirect tax rates, could increase and tax authorities could be carrying out audits and raising penalties.

# What are the potential outcomes that might occur if those changes are implemented?

Higher rates and more audits are going to make companies much more concerned about processes and data. They will need external help to look at their teams, determine whether they are doing the right things, whether they have the right skills, whether they are able to do everything that is asked of them, and whether they have the right tools to do it. They will need advice for all these questions.

# Do you think that change will have a positive effect on both your practice and the wider regional/jurisdictional market?

There are positives and negatives in every change. Definitely, it will lead to more opportunities for our practice. But also, the regional market and the work that we do will definitely change. We need to make sure we have the right skills and have people in the right places in order to be able to support our clients. This will give us the opportunity to show the strength of our network.

# What legislative changes would you like to see implemented that you think would have the most positive effect on your practice and the wider regional/jurisdictional market?

It would be great to see a more homogenous VAT system across the region, like in the European Union, so that businesses have a bit more consistency and, therefore, comfort that they were not missing anything. More realistically, I'd like to see rules on the publication of tax rulings, so that taxpayers could be aware of the positions taken by tax authorities.

#### Interview

### Do you think something like that is likely to be implemented in the near future?

I don't think we'll be seeing an Asia-wide VAT system, although of course, tax authorities cooperate more now than ever before.

# What have been the biggest developments in tax technology and where do you think the next area of focus might be?

The big developments have been in analytics and automation. I expect that we'll continue to see this, but with a focus on cloud ERP and how to effectively configure systems to be able to get the best data management, data analysis, and compliance automation positions for companies.

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**HONG KONG SAR** 

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Tiang & Partners

# Sudipta Bhattacharjee

Languages: English, Hindi, Bengali Bar admissions: Bar Council of Delhi

#### **Biography**

Sudipta is a lawyer with more than 15 years of experience, specializing in indirect tax advisory (including GST, Customs, international trade laws, pre-GST indirect taxes as well as State Excise laws affecting alcoholic beverages industry), tax controversy management & contract documentation. Sudipta has been recognized as a leading Indirect tax and International trade law expert by various reputed directories like RSG, Legal500, IBLJ, ITR etc. Sudipta is a thought-leader in his domain and regularly publishes articles and speaks in various prestigious conferences. He has authored a book titled "GST: Works contracts and other EPC/construction contracts" (by Taxmann Publications) which has received rave reviews and is already on its 6th edition.



Advaita Legal



#### **Association** memberships

Progress Harmony and Development Chamber of Commerce (PHDCC) Associated Chamber of Commerce (ASSOCHAM)

# **Academic qualifications:**

BA.LLB (Hons.)

INDIRECT TAX LEADERS

### Recent matter highlights

- An Advaita team led by Sudipta obtained relief in the form of a favorable interim order from Delhi High Court in a Rs 60,000 crore (around US\$8.8 Billion) matter for 13 banks in a service tax/GST issue affecting the whole banking sector
- Sudipta spearheaded the Advaita team in challenging (across 5 different High Courts in India) constitutional validity of levy of Indian GST on ocean freight services rendered by a foreign entity to another foreign entity located outside India in cases where the goods enter India. The first success has been received vide the landmark order from Gujarat High Court on 23.1.2020 holding levy of GST on ocean freight services as unconstitutional.
- In a landmark deal in the E-Commerce space in India, Uber sold off its Eats business in India to Zomato in January 2020. Sudipta, as a specialist in Indirect tax/ GST, provided day-to-day handholding and strategic inputs from a GST perspective to facilitate Uber's decision-making process vis-à-vis the structure devised for this transaction.
- Sudipta spearheaded strategic state excise law advisory to a leading MNC alcoholic beverages company by formulating necessary guidelines for the client to carry out its brand extension activities in various States in India

# V Lakshmikumaran

Languages: Hindi, English, Tamil

#### **Biography**

Mr V Lakshmikumaran has over three decades of experience as a leading litigating lawyer in India. Before entering legal practice in 1985, he worked with Indian Revenue Services. Today, he represents clients across sectors before various adjudicating authorities, tribunals, high courts and the Supreme Court of India.

#### **Practice areas**

- IP Management
- Dispute Resolution
- Litigation
- Tax Consulting
- GST

#### **Sector specialisations**

- Automotive
- Banking
- · Food and Beverage
- · Oil and Gas
- Tech and Telecoms

# Recent matter highlights

- Handled complicated custom valuation matter for an international alcoholic beverage company.
- Handled an international arbitration for a Singapore client in oil and gas sector.
- Handled private investment in e-commerce sector.

#### **Association memberships**

- The Chamber of Tax Consultants
- International Chamber of Commerce
- International Fiscal Association

# **Academic qualifications**

He holds a bachelors degree in Law and a Masters degree in Mathematics from Madras University.



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# L Badri Narayanan

Languages: English, Hindi, Tamil

Bar admissions: Admitted to practice in India and New York

### **Biography**

He represents clients on various tax, commercial, IP & regulatory matters. For over 10 years, he has been advising clients across a broad range of contentious situations (in both representative and advisory capacity), from internal or regulatory investigations through to formal court or arbitral proceedings. He has experience in GST laws and has been involved in counselling companies on key issues concerning supply chain. He practiced IP Law in US, before joining L&S.

#### **Practice areas**

- IP Management
- Restructuring
- Corporate
- Competition/Anti-trust Cases
- GST
- Customs

### Sector specialisations

- Banking
- Real Estate
- Technology and Telecommunications
- Logistics
- Manufacturing

# Recent matter highlights

- Handled the investigation of large FMCG companies on anti-profiteering laws under GST.
- · Advised a global payment company on international tax issues arising out of India business transactions.
- Advised an Indian multi-national corporation on tax implications of slump sale of their business to another global company under Indian income tax and GST laws.

#### **Association memberships**

- International Bar Association
- The Chamber of Tax Consultants

#### **Academic qualifications**

B.Sc. Hons. (Physics); LL.B. (London); and LL.M. (Cornell University, USA)



Lakshmikumaran & Sridharan



# Rohan Shah

Mr. Shah has been practicing in the area of Indirect Taxes for the past 33 Years. Mr. Shah has been extensively involved in advising various Industries in relation to Tax Advisory and Structuring Issues related to GST, Customs Laws, Service Tax, Excise and VAT. Mr. Shah regularly advises on diverse Indirect Tax Issues – the Oil and Gas Industry, the Pharmaceutical Industry, the Gem and Jewellery Industry, the Real Estate Industry, the Retail Industry, the Ecommerce Industry, the Automotive Industry, the Alcohol & Beverage Industry, the Insurance Industry, the Banking Industry and the Projects & Infrastructure Industry.

Mr. Shah has been appointed by the Government of India on various committees. Mr. Shah has been appointed by the Ministry of Finance, India as a member of various expert committees, in relation to the imposition of Indirect Taxes on the Gem and Jewellery Industry and the Textile Industry. Mr. Shah was awarded as the Tax Lawyer of the year for 2019 by Legal Era.



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Mr. Shah has been rated as one of India's Leading Tax Lawyers consistently over last 2 decades by World Tax, Benchmark Litigation Asia Pacific, Chambers & Partners Asia Pacific, The Legal500 Asia Pacific, International Tax Review, Who's Who Legal, and Tax Directors Handbook. Mr. Shah has been appointed by the Ministry of Commerce and Industry in India as India's Representative and Governor on the board of Economic Research Institute for ASEAN and East Asia ("ERIA").

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**Economic Laws Practice** 

#### T Viswanathan

Lakshmikumaran & Sridharan

# **Ahdianto**

Languages: Bahasa Indonesian, English

#### **Biography**

Ahdianto is a tax partner with more than 21 years' experience in tax, customs and business consulting. He is a licensed tax court attorney, a licensed customs court attorney and holds Indonesian Customs Expert Certification and Indonesian Tax Brevet Certification (Level C- the highest level). He has indepth knowledge of national and cross-border issues, and various customs issues.

Ahdianto is a 2017 and 2018 Asia Tax Disputes & Litigation Practice Leader Finalist by International Tax Review (ITR). He led the tax disputes and litigation team of GNV Consulting to win the award as the ITR 2018 Indonesia Tax Disputes & Litigation Firm of the Year.

He is known in the market for his litigation expertise in the Tax Court. Cases that he handles often become a reference for

other cases in the Tax Court. His approach in dispute settlement not only focuses on taxation regulations but also combines this with relevant regulations from

other institutions or ministries or other law, such as other legislation or civil law, to strengthen the case. Many of the cases that he handles do not have previous cases for reference, so he has to build arguments from scratch with the clients, yet he manages to win the case.

Ahdianto also has extensive knowledge and experience in Indonesian tax and customs (indirect tax). He has engaged in several tax projects such as performing tax diagnostic review, tax disputes settlement, corporate tax restructuring, obtaining tax and customs facilities, tax and customs refunds, bonded zone facility audit and customs review. In the past, he was indirect taxes head with Deloitte Indonesia. He has a broad experience in strategic planning and representation in the Indonesian Tax Court for multinational companies and has served a broad range of multinational companies, including manufacturing, mining companies, financing services, trading services and constructions services.

#### Sector specialisations

Mining, Telecommunications, Transportation & Logistics, Plantation, Manufacturing, Trading

# **Academic qualifications**

- Master of Management majoring in Finance, Gadjah Mada University, Yogyakarta, Indonesia
- Chemical Engineering, Gadjah Mada University, Yogyakarta, Indonesia



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**GNV**Consulting

#### Indonesia

# Jeklira Tampubolon

Languages: Bahasa, English

#### **Biography**

Jeklira Tampubolon is one of Indonesian leading indirect tax advisors. She has 22 years experiences as a tax consultant and spent 15 years in big four tax firm. Over half of she's carrier handling indirect taxes including VAT, Customs and Global Trade.

She is a licensed tax court attorney for over 10 years and has extensive experience handing indirect tax disputes resolutions which involves representing clients at the Tax Court and assisting lawyer handling judicial review at the Supreme Court.

She is lead indirect tax team in GNV Consulting Services which has been involved in various types of indirect tax/customs and global trade assignments, such as; disputes resolutions, audit, due diligence and restructuring, diagnostic review, tax planning, etc.



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#### **Sector specialisations**

Mining, Telecommunication, Manufacturing, Automotive, Plantation, Trading, etc.

# Professional certification and memberships

- Licensed Tax Court Attorney
- Indonesian Tax Brevet Certification (Level C)
- Indonesian Customs Expert Certification
- Member of Indonesian Tax Consultant Association
- Member of Indonesian Customs Specialist Association

#### **Academic qualifications**

Bachelor of Information Technology

#### Indonesia

**Ahdianto** 

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**Bambang Budiman** 

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Languages: English, Filipino

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Mark is a CPA-Lawyer and a partner of Mata-Perez, Tamayo & Francisco (MTF) Attorneys-at-law, a member firm of International Tax Specialist Group (ITSG). He brings over 30 years of experience advising various local and multinational clients on contentious matters relating to tax, corporate, global trade and customs.

Previously, Mark served as a tax partner at SyCip Gorres Velayo (SGV) & Co., a member firm of Ernst & Young Global, and led the firm's indirect tax practice. He handled the firm's major tax and customs engagements.

He extensively participated in the drafting of Republic Act No. 10863 (Customs Modernization and Tariff Act) as well as its various implementing regulations.

Mark was named the "Asia Tax Practice Leader of the Year" awarded by the International Tax Review at the 2016 Asia Tax Awards held in Singapore.



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Tax (domestic, local and international), Customs and Trade, Corporate reorganization and restructuring, Investment and Incentives, Litigation

# Recent matter highlights

- Provided a highly specialized tax advisory involving a billion-dollar project on Service Contract 56 for the exploration of petroleum in the Sulu Sea Region which includes advice on tax situs and cross border issues, taking into consideration the hierarchy of laws.
- Provided an extensive VAT and Customs duty advice to the world's leading Nutrition, Health
  and Wellness Company on its planned redesigning of its procurement organization to move
  from a partially "decentralized" model to a centralized model where all strategic sourcing
  activities, category management activities and supplier relationship management will be performed above market by co-located teams.
- Handled an extensive review of the Project Financial Model of a Project Company as part of the overall conduct of a comprehensive tax and accounting analysis.
- Secured the 1st computed value ruling in the Philippines for a multinational healthcare company.

#### **Sector specialisations**

Manufacturing, Automotive, Pharmaceutical, Health Care, Mining, Telecommunications and Media, Semiconductor, Consumer Goods & Services, Oil and Gas, Power & Energy, Tobacco

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Europe, Middle East & Africa

# **EUROPE, MIDDLE EAST & AFRICA**

# Regional interview



**Anbreen Khan** Middle East



Liesbet Nevelsteen

# What is the most significant change to your region/ jurisdiction's indirect tax legislation in the past 12 months?

Anbreen: The most significant change has been the focus on digitalization for both tax authorities and taxpayers. In particular, the past three months have defined the past 12 months in that the force majeure COVID-19 circumstances mean that the approach to post-COVID-19 planning will have a renewed focus on digitalization and "new approaches" to technological advancement for taxation.

Liesbet: It is difficult to name one change; rather, we have faced a "trend" whereby more and more regulatory initiatives have required the introduction of indirect tax controls in the actual business process. In this framework, we can consider, for example, the "EU Quick Fixes" that require the validation of customer Value Added Tax (VAT) numbers at the moment of supply, or Poland's "White List" rule that requires bank account numbers of customers to be checked upon payment.

While real time reporting, Standard Audit File for Tax (SAF-T), and similar types of requirements are being implemented, getting one's data right in the first time was already an important point of attention for businesses. The above-described requirements put an additional layer of control within businesses.

In other words, performing checks only for VAT compliance purposes will no longer suffice.

# How do you anticipate that change impacting your work and the market moving forwards?

Anbreen: I think as tax advisers, we must necessarily be more strategic and long-term in our thinking, and also embrace new

#### Interview

skillsets via automation/technology, alliances, and teaming across geographies. We also need to be mindful of the flip side technology issues, such as cyber risk and data protection.

Liesbet: Companies will need to look at the full VAT lifecycle to achieve compliance. VAT is a transactional tax that is heavily impacted by the decisions/quality controls of different stakeholders within a business (procurement, accounts payable/receivable, master data teams, supply chain, etc.). Therefore, having a clear "tax control framework" – a business-fit indirect tax operating model fully supported by the required level of automation – will be important for businesses.

Addressing the above challenges is no longer an option; rather, it's a requirement induced by regulatory changes. In this context, we see multinationals addressing these challenges by redesigning and transforming their VAT operations, offering possibilities for Deloitte to assist with not only the "Imagine" and "Deliver" phases, but also the "Run" phase of these new models. We expect businesses and service providers to become strategic partners in the delivery of indirect tax.

# What impact do you see the COVID-19 pandemic having on your work directly and on the wider tax environment, in both the short and long term?

**Anbreen:** As already mentioned, I think that COVID-19 will require a sharper focus on an outlook which is more about "digital taxation". Importantly we will also need to envision and plan for extreme scenarios and enhance our capabilities to develop solutions which build in flexibility and alternatives or options for what might not be foreseen. I also consider that vulnerability, and perhaps different working patterns, will impact our work. For example, less travel, and different ways or styles of working.

Liesbet: Cash has always been king. In these times especially, businesses seek to confirm that indirect tax cash and cash flow are controlled. This means not only a focus on the implementation of indirect tax cash/cash flow areas of improvement (e.g., VAT payment extension, focus on unlocked VAT), but also a better and increased reporting/management of indirect tax cash/cash flow going forward.

Both have been an important point of attention to our clients, giving us the opportunity to assist with customer fit services (e.g., building required reporting, asking for VAT payment/filing deadline extensions, refund procedures, etc.).

In addition, the increased need to control costs and address talent challenges (e.g., reduced workforce, working from home, etc.) due to the COVID-19 pandemic have also made companies (re)consider their current operating model for indirect tax with an eye on outsourcing and operating opportunities.

# Given the likely long-term implications of COVID-19 on things like remote working and digital retail, how do you see tax technology developing to accommodate this new reality and where do you think the next area of focus might be?

**Anbreen:** My strong view is that tax technology is central to accommodating this "new reality". As human beings, we are highly adaptable and COVID-19 has shown that we can adapt.

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However, what is crucial is to have robust technology platforms and training ourselves on new digital platforms including disruptive technologies (e.g., artificial intelligence; robotics). I think the next area of focus will be about building more resilience within businesses, combined with technology.

Liesbet: I understand that people's experience in their day-to-day life with technology also influences the way they look at technology requirements from a business point of view. While people are working from home, where their professional and personal time co-exist, I expect that criteria such as speed, user friendliness, and customized insights have become crucial to them. This is what people experience with personalised news feeds, for example.

Assuring that a customer's talent will have this experience with Deloitte and the use of technology will become crucial. For example, SAP, with S4Hana, has an important focus on both speed and user experience.

# What potential other legislative changes are on the horizon that you think will have a big impact on your region/jurisdiction?

Anbreen: Working in the Middle East and across the Gulf Corporation Countries (GCC), taxation is developing and fast evolving - for example, we recently saw Saudi Arabia increase the VAT rate from 5 percent to 15 percent. Therefore, the introduction of taxes in GCC countries which are yet to fully implement tax, as well as implementing the expansion of taxes within GCC countries, and developments in electronic transactions are likely to trigger the main legislative changes.

Liesbet: Although COVID-19 did put some of the developments on hold, authorities are expected to increase the implementation of on-demand SAF-T requirements (e.g., Romania already announced its intention to do so).

# What are the potential outcomes that might occur if those changes are implemented?

Anbreen: The outcomes of taxation are positive, especially for the GCC/Middle East region, allowing more diversification, and funding for public, developmental and welfare programmes. These changes will also mean that the economic outlook can be more stabilised.

Liesbet: SAF-T will, without a doubt, increase the need of having the right data the first time. On-demand SAF-T not only covers VAT-related data, but also data such as general ledgers, warehouse, payments, etc. The requirement to look at data holistically across all taxes becomes essential in this context.

The more authorities implement these types of SAF-T requirements, the more businesses will need to focus on cross-tax data models. If companies are moving towards a new ERP system such as S4Hana, this requirement will be high on the business' agenda. Getting the data right and controlled is the highest priority. The technology required to support the transmission of data to local tax authorities is also important, but easier to address in practice.

#### Interview

# Do you think that change will have a positive effect on both your practice and the wider regional/jurisdictional market?

**Anbreen:** In my view, change is an inevitable part of life – whether viewed from a personal, career, commercial or economic perspective. It is the way one deals and adapts to change that may or may not make the effect or result a positive one. My viewpoint is that change should always be looked at positively and this brings about optimism and the confidence to grow and invest in better opportunities and new markets.

Liesbet: Yes. Over the past few years, these types of changes have opened a "'new" market for indirect tax advisers. Together with our clients, we translate the indirect tax treatment of their operations into data/process/technology needs for indirect tax. This has forced us to think in a practical, business-minded way that combines our indirect tax expertise with our technology and process capabilities. These types of business opportunities will only grow in the coming years, allowing us to assist our clients with finding the right operating models tailored to their needs.

# What legislative changes would you like to see be implemented that you think would have the most positive effect on your practice and the wider regional/jurisdictional market?

**Anbreen:** I think that governments should consider providing more flexibility in the process of writing and bringing in new laws and amending existing laws. I say this because the emergency tax measures that had to be brought in during the COVID-19 outbreak showed that "quick fixes" are necessary to aid society and the economy in times of emergency. It would be good to see this at the GCC level.

**Liesbet:** As explained above, authorities are focusing on data and require controls to be implemented into business processes. That said, they should keep the business reality in mind – depending on the size of the operations, old ERP systems may need to be replaced, and companies have to address cost constraints and sometime face the challenge of having all the correct steps addressed for VAT purposes.

Indeed, one can appreciate the evolution of the analytical capabilities of tax authorities that can now reveal potential errors more easily. However, this should not lead to a situation of automatically imposing high penalties or interest. Business and indirect tax departments are often working with the right intentions and plans, but because of a one-time process/technology failure, incorrect reporting of indirect taxes may occur. In their legislative frameworks and audit behaviours, tax authorities should find a balance between "punishing" and "correcting." An open dialogue, and more programs such as the so-called "Certified Taxable Person," may help facilitate this.

# Do you think something like that is likely to be implemented in the near future?

**Anbreen:** Frankly, I am not certain. However, I know it is something on the radar of governments across the globe and so it will be interesting to track.

**Liesbet:** I hope so. Otherwise, the cost of compliance (and as a result, the cost of doing business) may increase substantially.

# What have been the biggest developments in tax technology and where do you think the next area of focus might be?

Anbreen: I think that alternative technology platforms for taxation - for example, mobile, apps, and other digitized products such as smart watches and smart notepads, etc. - are significant, allowing a full range of options for tax authorities and taxpayers to be able to collect and pay taxes in more flexible ways.

Liesbet: "New" technologies (although no longer that new) such as blockchain, the Internet of Things (IoT), etc., offer a huge opportunity in the field of indirect tax. Think of the proof of transport, whereby the movement of goods is on a blockchain. Think of the initiation of an order/self-bill with required VAT treatments if, via the IoT, it shows inventory is too low. As indirect tax practitioners, we need to remain very close to businesses in order to understand their plans in these domains and to leverage the benefits for indirect tax.

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# **Danny Stas**

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#### Cliff Kristoffersen

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# Elisabeth Ashworth

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#### Ariane Beetschen

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# Gaëtan Berger-Picq

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# **Delphine Bouchet**

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# **Alain Recoules**

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# William Stemmer

Taj See page 55

# Philippe Tournès CMS Francis Lefebvre Avocats

# Thierry Vialaneix

Baker McKenzie

# Jürgen Scholz

Languages: German, English

# **Biography**

Jürgen Scholz, Certified Tax Advisor, Dipl.-Finw., M.B.L.-HSG (Univ. St. Gallen) is a member of the Executive Board of WTS in Germany, heads inter alia the German VAT group of WTS with a team of about 100 dedicated VAT specialists as well as the WTS Global Service Line Indirect Tax with a presence in more than 100 countries.

#### **Practice areas**

Business model optimisation, technology services, tax consulting, VAT, supply chains

# **Sector specialisations**

Automotive, banking, financial services, industrials, real estate

#### **Association memberships**

German scientific organization on VAT (board member)

# **Academic qualifications**

Master in European and International Business Law, Univ. St. Gallen, 2009 Certified tax advisor, Steuerberaterkammer NRW, 2007 Dipl. Finanzwirt, FHF Nordkirchen, 2003



WTS Global



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## Bettina Mertgen

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## Jochen Meyer-Burow

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#### Michael Schäfer

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## Peter Schalk

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## Peter Schilling

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## Jürgen Scholz

WTS See page 69

## Karsten Schuck

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## Joachim Strehle

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## Georg von Wallis

**Greenberg Traurig** 

## Oliver Zugmaier

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## Kyriaki Dafni

Deloitte See page 56

## Alex Karopoulos

Zepos & Yannopoulos

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## Tímea Bodrogi-Szabó

Hegymegi-Barakonyi és Társa Ügyvédi Iroda

## Ádám Fischer

Jalsovszky Law Firm

# Tamás Gyányi WTS Klient

## Eszter Kálmán

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## Matthew Broadstock

Matheson

#### **Brian Butler**

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## Neil Byrne

## Niall Campbell

**KPMG** 

## **Breen Cassidy**

## **Donal Kennedy**

Deloitte See page 56

## **Greg Lockhart**

Matheson

## Sonya Manzor

William Fry

## Vincent McCullagh

Deloitte See page 56

#### Dermot O'Brien

Dermot O'Brien & Associates

#### Ireland

## Renata Slobodova

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## John Stewart

Deloitte See page 56

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## **Ehud Kronfeld**

Eitan Mehulal Sadot

## Meir Linzen

Herzog Fox & Neeman

## Nisim Pahima

Deloitte See page 56

## **Anat Shavit**

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## Iris Weinberger

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## Andrea Parolini

Languages: Italian, English

## **Biography**

Andrea Parolini is a partner of Maisto e Associati that he joined 1998, after having worked with another Italian tax firm. He has developed considerable expertise in VAT, EC Law and taxation of entertainers.

He is a member of the VAT expert group, which has the task to advise the European Commission on the preparation of legislative acts and other policy initiatives in the field of VAT.

He is author of many publications on tax matters and is frequent speaker at congresses.

He has been lecturer (professore a contratto) of tax law at the Catholic University of Piacenza from 2006 to 2019 and he acted as Legal and Economic Advisor to the Italian Prime Minister on VAT matters (2014-2016).



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## Recent matter highlights

He has been advising several leading domestic and international companies operating in a variety of industries including energy, financial services, insurance, telecom, fashion, shipping and transportation, in relation to VAT, customs, excise duties and supply chain matters.

#### **Practice areas**

VAT, Customs, Excise Duties, Supply Chain

#### Sector specializations

Energy, Financial Services, Insurance, Shipping, Telecom, Transport, Fashion

#### **Association** memberships

Association of Chartered Accountants (1994) International Fiscal Association (1998) VAT Club (1998)

#### Academic qualifications

In 1999, he obtained an LL.M. Degree with honors in International Tax Law at the University of Leiden, The Netherlands

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## Nicola Crispino

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## Martijn laegers

Languages: Dutch, English, German

#### **Biography**

Martijn is a partner of Taxand Netherlands where he heads the Dutch Indirect Tax practice since 2014.

His practice focusses on VAT and Customs matters, both in a Dutch domestic and EU/Global context. He is knowledgeable on the EU regulatory indirect tax framework and advises clients active in various industries, including financial services, manufacturing and consumer business. The assignments extend beyond the rendering of tax advice alone, as tax controversy management (including dispute resolution and court representation) have become increasingly important in the national and international indirect tax landscape.

Martijn is an attorney-at-law and is admitted to the Amsterdam Bar (2003). He obtained a degree in tax law from Maastricht University in 1997. He is a member of the Dutch Tax Lawyers Association ("Nederlandse orde van Belastingadviseurs") and of

the Dutch Tax Scholar Association ("Vereniging van Belastingwetenschap").

Prior to joining Taxand, Martijn gained over 15 years of experience in international indirect taxation within Andersen/Deloitte and Baker & McKenzie.



Controversy management, Tax consulting, International tax advisory, VAT, Customs, Supply chains

## Sector specializations

Financial services, Healthcare, Investment management, Natural resources, Real estate

#### **Association memberships**

- Dutch Tax Lawyers Association ("Nederlandse orde van Belastingadviseurs")
- Dutch Tax Scholar Association ("Vereniging van Belastingwetenschap")

## **Academic qualifications**

Martijn is an attorney-at-law and is admitted to the Amsterdam Bar (2003). He obtained a degree in tax law from Maastricht University in 1997.



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## Egil Stefan Eilertsen

Languages: Norwegian and English

## **Biography**

Eilertsen is an experienced lawyer in the field of Norwegian income tax for corporations and individuals, VAT, custom charges, duties, and property tax, in a variety of industries such as finance, real estate, trade, manufacturing, energy, and shipping. He represents clients during tax audits, complaints and litigations.

#### **Practice areas**

- · Corporate Taxes
- Dispute Resolution
- Litigation
- Tax Consulting
- VAT
- Property tax

## **Sector expertise**

- Energy
- · Financial services
- Real estate
- Shipping

## **Association** memberships

Member Norwegian Bar Association

## **Academic qualifications**

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## Nils Eriksen

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#### **Biography**

Nils has 25 years of experience with Norwegian and international indirect tax issues and heads Brækhus' Indirect Tax Practice. His international indirect tax experience including positions as Partner in Arthur Andersen and Baker & McKenzie, Amsterdam, Senior Advisor OECD, Paris and National Expert EU Commission, Brussels, is unique in Norway. Due to his unique international experience his clients include several multinational enterprises. He is a lecturer and examiner on the Master Programme on Indirect Tax at the Business School of Norway (BI), has written numerous articles and contributions to books on international indirect tax and is the Norwegian member of the European VAT Club.



Brækhus Advokatfirma



#### **Practice areas**

Transactions, audit defence, dispute resolution, international tax advisory, VAT, customs

## **Sector specialisations**

Construction and materials, financial services, oil and gas, tech and telecoms, transport

## **Association memberships**

European VAT Club

## **Academic qualifications**

Master of Laws, University of Oslo, 1992

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## Nils Eriksen

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## Lars Erik Norborg

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## Jan Ove Fredlund

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## Fernando Castro Silva

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Vieira de Almeida & Associados

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## Joana Lobato Heitor

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## Marta Machado de Almeida

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## Ioana Maldonado Reis

Abreu Advogados

## Catarina Matos

## Francisco Cabral Matos

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## Paulo Mendonça

## Raquel Montes Fernandes

CMS Rui Pena & Arnaut

## Inês Moreira dos Santos

Vieira de Almeida & Associados

## Filipe Nogueira

## Ioana Nunes dos Reis

Deloitte See page 58

## Diogo Ortigão Ramos

Cuatrecasas

## Miguel Reis

## Hugo Salgueirinho Maia

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## Inês Teixeira

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## Tiago Almeida Veloso

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#### Isabel Vieira dos Reis

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#### Barbara Henzen

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## Vlad-Constantin Boeriu

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## **lean-Marc Cambien**

## Ioana Iorgulescu

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#### Mihai Petre

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## Alexandru Tabacu

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Pepeliaev Group

## Alexandra Alexeeva

TaxAdvisor

## Alexander Anichkin

Clifford Chance

## **Egor Batanov**

Saveliev Batanov & Partners

## Oleg Berezin

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#### Victor Borodin

ΕY

## **Boris Bruk**

Dentons

# Alexander Bychkov Baker McKenzie

## Alexander Chmelev

Baker McKenzie

## Dzhangar Dzhalchinov

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# Sergey Gerasimov Althaus Group

## Yulia Kolesnikova

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#### Russia

## Oleg Konnov

Herbert Smith Freehills

#### Vladimir Konstantinov

PwC

## Dmitri Kostalgin

TaxAdvisor

## Maria Kostenko

Baker McKenzie

## Alexey Matveev

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#### Tatiana Matveicheva

FBK Legal

## **Andrey Nikonov**

Pepeliaev Group

#### Nadezhda Orlova

FBK Legal

## **Dmitry Paramonov**

Bryan Cave Leighton Paisner

## Petr Popov

Pepeliaev Group

## Kirill Rubalskiy

Kveidze & Partners

## Natalia Ryabova

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## Igor Schikow

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## Arseny Seidov

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## Sergey Shapovalov

Shapovalov Petrov Law Firm

## Andrey Tereschenko

Pepeliaev Group

## **Evgeny Timofeev**

Bryan Cave Leighton Paisner

## Maxim Vladimirov

Noerr

#### Alexei Yakovlev

TaxAdvisor

#### Russia

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Mandat Consulting

## **SOUTH AFRICA**

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#### Charles De Wet

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#### Robert Gad

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## **Dermot Gaffney**

## Johan Heydenrych

KPMG

## Peter Maxwell

Deloitte See page 59

## André Meyburgh

#### Leon Oosthuizen

## Mark Silver

Deloitte

#### Severus Smuts

Deloitte See page 59

#### Virusha Subban

Baker McKenzie

## Suzanne van der Merwe

Deloitte See page 59

# Gary Vogelman Java Capital

## Jacqui Wierzbowski

Deloitte See page 59

## lavier Galván Falcón

Languages: English and Spanish

#### **Biography**

Javier has developed his professional career as VAT specialist since 2003. He started within the Indirect Tax Department of Landwell - PwC, at Madrid office, assisting national and international companies in VAT & Customs advisory and compliance. Focus on VAT treatment of cross-border transactions he has a deep expertise in VAT implications of international trading of goods, international VAT recovery, set-up of VAT structures and local VAT compliance.

In 2014 founded Diligens Tax Consulting SL with his partner Ignacio Sandino, which is an exclusive Spanish VAT boutique for VAT consultancy and compliance services. Since 2016 Diligens also assist international companies in Transfer Pricing services.



Diligens Tax Consulting,



#### Recent matter highlights

- Analysis of VAT treatment of international trading of goods and cross-border services in order to implement the most accurate VAT structure for recovery and VAT cash-flow point of view.
- Assistance with VAT implications on e-commerce of goods and electronically supplied services.
- Implementation and review of codification of the Immediate Provision of Information system (S.I.I.) for companies of different industries and sectors.

#### **Practice areas**

Tax consulting, VAT consulting, tax for customs, Excise Duties, Transfer Pricing

## **Sector specializations**

Automotive, consumer goods and services, energy, financial services, industrials.

#### **Association** memberships

British Chamber of Commerce in Spain Swiss Business Hub in Spain Spanish Association of Financial and Tax Advisors

#### **Academic qualifications**

Master Degree in Tax Advisory – IE Business School in Madrid – 2012 Master Degree in Tax Advisory - Escuela de Negocios CEU in Madrid - 2002 Business Administration Degree - Universidad de Las Palmas de Gran Canaria

## Fernando Matesanz

Languages: Spanish, English

#### **Biography**

Fernando Matesanz is one of the few Spanish lawyers exclusively dealing with Indirect Tax matters. He has been advising on Indirect taxes for the last 16 years.

Fernando is a specialist in International VAT. He has a big expertise in the implementation of efficient VAT structures for both Spanish and non-Spanish companies.

He is a member of the EU VAT Forum, one of the group of experts advising the EU Commission on VAT policies.

#### **Practice areas**

VAT

#### **Sector specialisations**

Automotive, Construction and Materials, Financial Services, Industrials, Tech and Telecoms, Transport



Managing Director

Spanish VAT Services
Asesores

Madrid +34 650105342 fmc@spanishvat.es www.spanishvat.es



## Recent matter highlights

- Fernando advises a large number foreign groups doing activities in Spain on the VAT treatment applicable to their business activities proposing alternative refund with the consequent cash flow benefit for his clients.
- Fernando advised on the implementation of the so called "real time VAT reporting", also known as SII to a very large number of companies doing activities in Spain.
- Fernando represents his clients in front of different courts including the European Court
  of Justice.

## **Association memberships**

- International VAT Association (Board Member)
- VAT Forum BV

## **Academic qualifications**

- Master Degree (LL.M.). Corporate Taxation. IE Business School, Madrid (Spain)
- Degree in European Community Law. FH-Pforzheim für Gestaltung, Technik, Wirtschaft und Recht, Pforzheim (Germany)
- Law Degree. Universidad San Pablo-CEU, Madrid (Spain)

## **Spain**

## Felipe Alonso Fernández

GTA Villamagna

## María Antonia Azpeitia

Baker McKenzie

## Antonio Barba de Alba

Cuatrecasas

## Silvia Bermudo

## Juan Cruz Cabrito Fernandez

Hecmar Rioja Asesores

## Carmen Caro Jaume

Caro Jaume & Partners

#### lavier Galván Falcón

**Diligens Tax Consulting** See page 89

## Celso García Granda

**KPMG** 

#### Eduardo Gardeta

Garriques

## Carlos Gómez Barrero

Garrigues

## Joseba Larragán Escurza

Garriques

## Carlos López

## Isabel López Bustamante

Deloitte Legal See page 59

## José Manuel de Bunes

Deloitte Legal See page 59

## Manel Maragall de Gispert

Garriques

## Javier Martín Martín

ΕY

#### Fernando Matesanz

Spanish VAT Services Asesores See page 90

## Alberto Monreal

PwC.

## Juan Ortin

Deloitte Legal See page 59

## **Spain**

#### Belén Palao Bastardés

Andersen Tax & Legal

## Natalia Caballero Pastor

**KPMG** 

## Manuel Perez de Algaba

**IVA** Consulta

## Pablo Renieblas

Deloitte Legal See page 59

#### Marcos Río

Deloitte Legal See page 59

## Jaime Rodríguez Correa

Deloitte Legal See page 59

## Ana Royuela

Baker McKenzie

## Cristina Rubio Gómez

Serte Economistas & Abogados

## Fernando Rubio Gómez

Serte Economistas & Abogados

## Daniel Valldosera Marse

Garrigues

## Eduardo Verdun Fraile

FΥ

## Alfonso Viejo Madrazo

PwC

#### Meritxell Yus

Cuatrecasas

## Javier Zapata Ferrer

Rivero & Gustafson Abogados

## Susann Lundström

Languages: Swedish, English

#### **Biography**

Susann Lundström is a tax partner in the indirect tax practice of KPMG Sweden. She advises a number of clients in a wide variety of industry sectors such as real estate, construction, telecom and shipping. She has extensive experience in advising clients in relation to M&A transactions, tax litigations and large cross border transactions.

#### Recent matter highlights

Susann has 20 years of experience in advising clients on indirect tax issues and has received numerous awards and recognition for her work. In addition to her work with clients, Susann is KPMG's representative in the industry's support group for the foundation of 'Centrum för Skatterätt' founded by the Stockholm School of Economics.



**KPMG** 



#### **Practice areas**

- Cross-border Project Management
- M&A
- Dispute Resolution
- Litigation
- Tax Consulting

#### **Sector specialisations**

- Automotive
- Construction and Materials
- Real Estate
- Shipping
- Tech and Telecoms

#### **Association** memberships

- · Certified tax advisor with FAR
- The professional institute for authorised public accountants.

## **Academic qualifications**

Susann holds an LLM from Stockholm University 1992 and before Susann joined KPMG she worked for the County Administrative Court in Sweden.

#### Sweden

## Lina Engman

Skeppsbron Skatt

#### Mattias Fri

Svalner

## Ulrika Grefberg

Svalner

## Ylva Hestréus

Deloitte

## Tomas Karlsson

ΕV

## Jan Kleerup

ER Legal

#### Susann Lundström

KPMG

## **Royne Schiess**

FΥ

## Pär Sundberg

Skeppsbron Skatt

## **Emil Virhammar**

Svalner

#### **SWITZERLAND**

## Elizabeth Barendregt

**KPMG** 

## Ivo Baumgartner

Kellerhals Carrard

## Mathias Bopp

**KPMG** 

## Nicolas Buchel

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## Harun Can

SwissVAT

## Diego Clavadetscher

Clavatax Steuerberatungs

## Patrick Conrady

TVA Solutions

#### Constant Dimitriou

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#### Switzerland

## Nicole Fragnière Meyer

Gillioz Dorsaz & Associés

#### Pierre Gillioz

Gillioz Dorsaz & Associés

#### Pierre-Marie Glauser

Oberson Avocats

#### Ivo Gut

Mazars

## Niklaus Honauer

PwC.

## Patrick Imgrüth

Tax Partner

#### Mario Kumschick

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#### Laurent Lattmann

Tax Partner

## Jan Ole Luuk

Walder Wyss

## René Matteotti

Tax Partner

## Michaela Merz

PwC

## Mónika Molnár

MME Legal I Tax I Compliance

#### **Xavier Oberson**

Oberson Avocats

## Jacques Pittet

Oberson Avocats

## Per Prod'hom

Pvthon

## Tim Reck Deloitte

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## Christina Rinne

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#### **Switzerland**

## **Tobias Rohner**

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## Corinne Scagnet

Clavatax Steuerberatungs

#### **TUNISIA**

## Sonia Louzir

Deloitte See page 60

## **TURKEY**

## Barış Demirel

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## Erdal Dinçtürk

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## Duygu Gültekin

Esin Attorney Partnership

## Sedat Taşdemir

## Salim Varnalier

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#### **UKRAINE**

## Tetyana Berezhna

Vasil Kisil & Partners

## Vladimir Kotenko

ΕY

## Vadim Medvedev

**Avellum Partners** 

## Alexander Minin

WTS Tax Legal Consulting / KM Partners

#### Victor Sereda

allTax

#### Alexander Shemiatkin

WTS Tax Legal Consulting / KM Partners

# Hennadiy Voytsitskyi Baker McKenzie

## Victoria Yaroshenko

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#### **UNITED ARAB EMIRATES**

#### Michael Towler

Deloitte

## **UNITED KINGDOM**

## Mark Agnew

Baker McKenzie

## Leslie Allen

Mishcon de Reva

## **David Anderson**

PwC.

#### **Andrew Baker**

**Davies Mayers Barnett** 

#### **Daniel Barlow**

Deloitte See page 60

## Jo Bello

PwC

## **Andy Brown**

Bird & Bird

## Mark Burgess

**DLA Piper** 

## Mike Camburn

**KPMG** 

## Danny Campbell

## Gary Campbell

Deloitte See page 60

## Michael Conlon OC

Temple Tax Chambers

## Simon Corzberg

Clifford Chance

## lason Craig

Deloitte See page 61

## Jane Curran

Deloitte See page 61

## Mark Delaney

Baker McKenzie

#### Dario Garcia

Mishcon de Reya

## **United Kingdom**

Kendra Hann

Deloitte See page 61

Gary Harley

**KPMG** 

**Barney Horn** 

Deloitte See page 61

Richard Iferenta

**KPMG** 

Richard Insole

Deloitte See page 61

David Jamieson

Baker McKenzie

Anbreen Khan

Deloitte See page 60

Andrew Loan

Fieldfisher

Kevin MacAuley

ΕY

Anna McLaren

Deloitte See page 61

David Milne QC

**Pump Court Tax Chambers** 

Christopher Orchard

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Adam Peacock

Baker McKenzie

Jonathan Peacock QC

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**Peter Perry** 

Davies Mayers Barnett

Ben Powell

Deloitte See page 61

Simon Prinn

Deloitte

**Neil Reeve** 

Deloitte See page 61

David Saleh

Clifford Chance

## **United Kingdom**

## David Scorey QC

Essex Court Chambers

## Nicola Shaw QC

Gray's Inn Tax Chambers

## **Rupert Shiers**

Hogan Lovells

Alan Sinyor Bryan Cave Leighton Paisner

## Ian Spencer

Ian Spencer & Associates

## Lee Squires

**Grant Thornton** 

## Helen Thompson

Deloitte See page 61

## Amanda Tickel

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## Richard Vitou

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