




Thinking big can help keep your tax controversy small.

Today's global connectivity means it is easier for companies to be faced with multi-dimensional, multi-country tax controversy. How can you manage the risk?



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New voluntary disclosure programs provide insights into tax administrators' audit approach.

Tax authorities in France and the UK have each announced new voluntary disclosure programs. The French voluntary disclosure program is available for new disclosure and settlement requests on a wide range of areas for companies not currently under audit or investigation. The program is not available for cases in which bad faith penalties, which the French authorities apply frequently, would apply; read more [here](#). The UK's new disclosure program, the Profit Diversion Compliance Facility is aimed at multinational enterprises that have used cross-border arrangements that HM Revenue & Customs thinks result in an artificial reduction in UK profits, including arrangements targeted by the diverted profits tax legislation. To qualify, the arrangements cannot currently be under investigation; read more [here](#) or watch a replay of a recent [webcast](#).

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Contact us for more information

Rob Hanson

EY Global Tax Controversy Leader
rob.hanson@ey.com

Adrian Ball

EY Asia-Pacific Director Indirect Tax
adrian.r.ball@sg.ey.com

Jeffrey Michalak

EY Global Leader for International Tax Services
jeffrey.michalak@ey.com

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