

International Taxation: DAC 6 and the new reporting duties for professional intermediaries and taxpayers regarding cross-border transactions

Introductory Remarks

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The cross-border transactions triggering the duty to report

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The hallmarks

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The main benefit test within the hallmarks

Federico Consulich

The exemption from the duty to report

- a. Criminal liability
- b. Attorney client privilege
- c. Rulings and data already in possession of the Tax Administration

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The implementation of DAC 6 in Italy

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Siemens AG/ICC Germany

The implementation of DAC 6 in Germany

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The implementation of DAC 6 in the UK

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The implementation of DAC 6 in France

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The implementation of DAC 6 and transfer pricing

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