

SAT PAL KHATTAR PROFESSORIAL LECTURE

# INTERNATIONAL TAXATION AT CROSS ROADS

**Professor Kees van Raad**Chairman of the International Tax Center Leiden,  
of counsel to Loyens & Loeff

Chairperson: Associate Professor Stephen Phua, NUS Law

THURSDAY, 22 FEBRUARY 2024  
5.30 PM to 7.00 PM

NUS LAW (BUKIT TIMAH CAMPUS), WEE CHONG JIN MOOT COURT

## SYNOPSIS

In the past decade, international tax policy and practice have been subject to unprecedented changes. Following the 2008 financial crisis, the 2013 BEPS initiative of G10/OECD aimed at countering tax avoidance by MNCs through the shifting of profits and at redirecting global tax treaty and transfer pricing policies. BEPS' initially unfinished Action 1 (Tax Challenges Arising from Digitalisation) later developed into BEPS 2.0, with Pillars One and Two as groundbreaking initiatives. At present, it is far from resolved how these initiatives will fare. What seems to be certain, however, is that the ways in which MNCs have been able to conduct their tax affairs rather freely, may come to an end. Transparency and cross-border harmonization are the policy key words in the years to come, with (for companies) aggressive tax planning and (for states) unfettered tax competition and unrestricted fiscal autonomy probably becoming things of the past.

The changes that are currently taking place are magnified by developments at the UN. It recently presented itself as a serious contender in setting the international tax agenda. In November 2022, the UN General Assembly adopted a resolution claiming a major role for the UN in initiating and developing global tax policies. That this was not a short-lived effort became apparent with last August's follow-up Report from UN's Secretary General and, very recently, a further UN resolution. Also, where tax treaty policy is concerned, in recent years the UN Tax Committee has become quite visible by expanding the UN Model with rules that are far from mainstream. Further, in October 2023 the Committee surprised the international tax community with proposals for a fast-track instrument to insert in existing tax treaties new (UN Model based) provisions and for far-reaching changes dealing with high-paid executives working online from low-tax countries. It appears that one century after the birth of international tax law in 1923 when the League of Nations published a Report on Double taxation prepared by four distinguished professors, we are reaching another milestone in the overall design of international tax law's architecture whose new contours are emerging, but which has not yet left the drawing boards.

## ABOUT THE SPEAKER



Professor Kees van Raad is the Sat Pal Khattar Visiting Professor in Tax Law at NUS Law; chairman of the International Tax Center Leiden, of counsel to Loyens & Loeff and past Professor of International Tax Law at the University of Leiden. He is also chair of the International Fiscal Association's Jury for the annual Mitchell B. Carroll Prize and a member of the Advisory Panel of BRITACOM (the tax branch of the organization set up to develop and implement China's Belt and Road Initiative).

He was earlier a member (1999-2012) and chairman (2006-2012) of the Executive Board of the European Association of Tax Law Professors, a member (2003-2015) of the Supervisory Board of the Max Planck Institute for Tax Law and Public Finance in Munich, Germany and a member (1988-2019) of the IBFD Board of Trustees / Advisory Council. Kees van Raad has published widely on international tax law issues in general and tax treaties in particular and has taught at many foreign universities.

## PROGRAMME

5.00PM: Registration  
5.30PM: Lecture by Professor Kees van Raad  
6.30PM: Q&A Session

## REGISTRATION

There is no registration fee for this lecture. Visit <http://bit.ly/3S6gDv6> or Scan the QR Code below to register by 15 February 2024 5.00PM.



### CONTACT PERSON

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## CPD POINTS



Public CPD Point: 1  
Practice Area: Tax  
Training Level: Foundation

Participants who wish to obtain CPD Points are reminded that they must comply strictly with the Attendance Policy set out in the CPD Guidelines. For this activity, this includes signing in on arrival and signing out at the conclusion of the activity in the manner required by the organiser, and not being absent from the entire activity for more than 15 minutes. Participants who do not comply with the Attendance Policy will not be able to obtain CPD Points for attending the activity. Please refer to <http://www.sileCPDcentre.sg> for more information.