

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

Introductory Remarks

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Program and Panels

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The cross-border transactions triggering the duty to report

Michele Bissoli

Studio Legale Gatti, Pavesi, Bianchi, Ludovici **The intermediaries and taxpayers bound to report**

Marco Adda

Studio Legale Bonelli Erede **The hallmarks**

Marco Melisse

Studio Legale Eversheds Sutherland **The main benefit test within the hallmarks**

Federico Consulich

Studio Legale Associato Giannangeli 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

Marco Ettorre

Studio Legale Gitti and Partners

The implementation of DAC 6 in Italy

Ruprecht Karlstorfer

Siemens AG/ICC Germany

The implementation of DAC 6 in Germany

Rachel Hawkins

Withers Worldwide UK

The implementation of DAC 6 in the UK

Eric Lesprit

TAJ-Deloitte/ICC France

The implementation of DAC 6 in France

Alberto Pluviano

Satisres Paris

The implementation of DAC 6 and transfer pricing

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