



Meijburg & Co  
Tax & Legal

# How the KPMG network resolves or prevents tax disputes

Think globally

Tax Controversy & Litigation

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**Organizations are increasingly involved in tax disputes with tax authorities. This happens in the Netherlands but also elsewhere.**

What role does the global KPMG network play in resolving or preventing tax disputes?

For us, a good network first and foremost means that you have good international collaboration with many international branches. This allows our clients who are experiencing problems to be assisted by their trusted advisor, regardless of where - in which jurisdiction - the problem has arisen, and who, as strategic sparring partner, safeguards a globally consistent policy.

As Aldo Mariani, attorney and partner at KPMG Meijburg & Co explains: "There are certain proven strategies that lead to a solution. And you're the client's strategic sparring partner in their jurisdiction. The network provides an additional layer of assistance and local sophistication, allowing you to achieve a result quickly and effectively."

## Know your client and opponent

Marc Temme, partner at KPMG Meijburg & Co: "The solution to the problem usually lies not only in the technical knowledge and expertise, but also in a proper understanding of the client's environment. We know the client and are familiar enough with their environment to be able to deal with the problem at the local level."

Aldo Mariani adds: “In practice, the vast majority of cases are settled amicably. You need to prepare thoroughly in advance and strategize and document your lines of defense. That way you know exactly where the challenges lie and you can also convince the opposing party – for example the local tax authorities – that you have a strong case. You thus show that an amicable settlement is a good solution for the opposing party. You have to get that dynamic going.” According to Marc Temme, it’s therefore really worthwhile to understand your opponent and where the cost-benefit for them lies: “The international KPMG colleagues know exactly what those local drivers are.”

## Best of both worlds

Janneke Versantvoort, Senior Manager and appointed to partner at KPMG Meijburg & Co as of October 1: “We are independent from our auditors and together with our lawyers constitute a really good team of specialists. We thus offer the best of both worlds: we have the global KPMG network, but also our lawyers who are more specialized in legal dispute resolution.” A global network is, moreover, not country-specific, but means that you can engage the best specialists in the world in major conflicts. “A good colleague in the UK who is used to dealing with major conflicts about a certain issue or in a certain industry, can also be used in other international cases.”

## Local differences

Aldo Mariani heads the global KPMG network Tax Dispute Resolution & Controversy Services. “We are constantly anticipating developments in the market. My role as head of the international controversy practice is

to work together with people from other countries and think about how we can do things even better and more efficiently.”

Aldo Mariani: “I am globally responsible, but in the regions there are people with a regional focus, such as Europe, the US and Asia. This ensures that we take local differences into account. Each country is different, just as our practices there. Besides the differences in legislation, you also have cultural differences. The trick is to interpret this to the local conditions. In that way, you allow such a global network to grow.”

## Sharing expertise and experience

International colleagues meet periodically both physically and virtually to share their expertise. They also share their ‘Controversy war stories’ – the interesting disputes in the last quarter – with each other and with clients. Janneke Versantvoort: “That doesn’t only concern country-specific elements, but also how you can resolve conflicts about certain issues. For example, I was recently involved in a dispute with Luxembourg about intellectual property and its transfer. I shared my experience with our international colleagues.” And further: “I recently was asked about this by someone from the KPMG network in Canada who had a similar problem. We discussed with each other how we had resolved that at the time, so that we could then devise an efficient and local solution for the case in Canada.”



## Think globally

Aldo Mariani: "There's a lot of expertise in the network. Not only in the resolution, but also in the preparation and prevention of problems. Each country has their own nuances. It's important to have exculpatory evidence and the grounds for your position readily available. If the tax authorities then instigate an audit, you can provide information quickly and adequately and in just the right amount to justify the legal position of the client."

Janneke Versantvoort emphasizes that specialists in controversy and litigation must think globally. "Often cross-border transactions are involved. We have specialists everywhere who can help us resolve specific formalities or the criminal aspects of controversy locally."

# Contact Meijburg



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The Tax Controversy & Litigation practice of KPMG Meijburg & Co is made up of a specialist and international team of tax professionals and lawyers. Together, they combine their expertise to find the most appropriate approach for their clients.

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