



Tax Controversy Update

2023 Financial Services Tax Conference

July 12, 2023
1:30 p.m. and 3:00 p.m.

Shaping the future:
**convergence
& collaboration**
2023 Financial Services Tax Conference

Presenters

Tom Kendall

COO/CFO, Five Mile
Capital

Ocean Mills

Global Head of Tax
Controversy, BlackRock

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Head of Corporate Tax,
SVP, Citizens Bank

Elisenda Monforte Vila

Partner, KPMG

Tom Greenaway

Principal, KPMG

Agenda

01

Common Experiences

02

Managing the Process

03

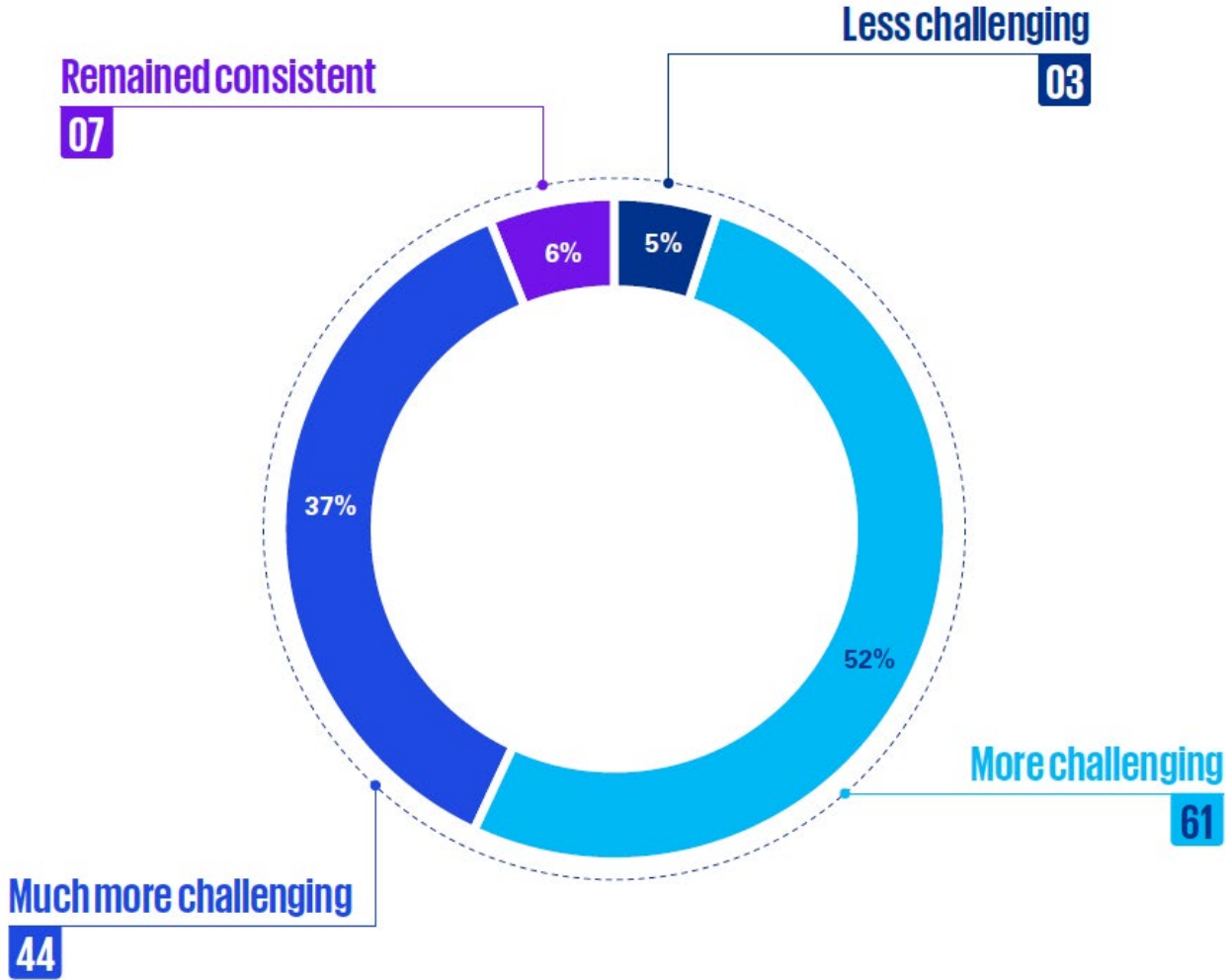
Managing Stakeholders

04

Resolution

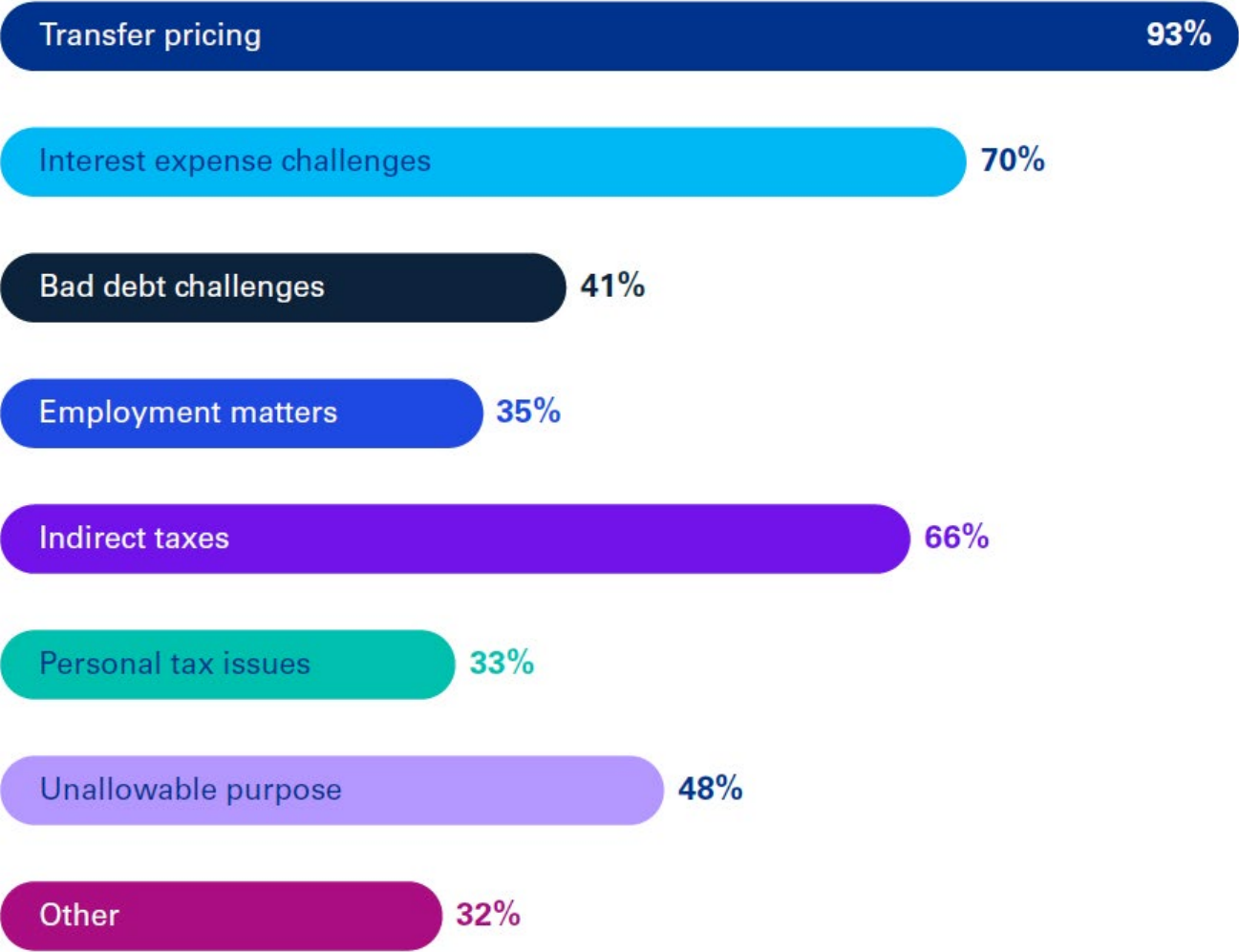
01 Common Experiences

Over the past 3 years, how would you say the disputes environment has changed?



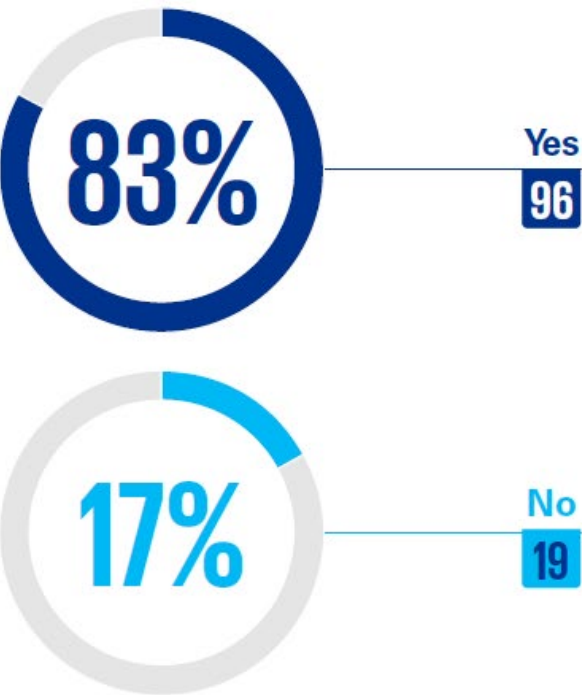
Reference: [Navigating the Global Tax Disputes Landscape \(KPMG International, February 2023\)](#)

Key areas of tax disputes

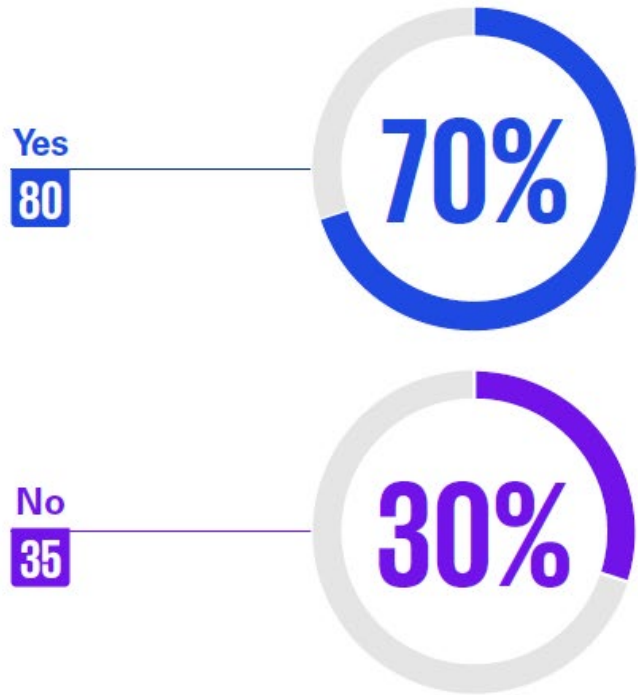


Digitalization

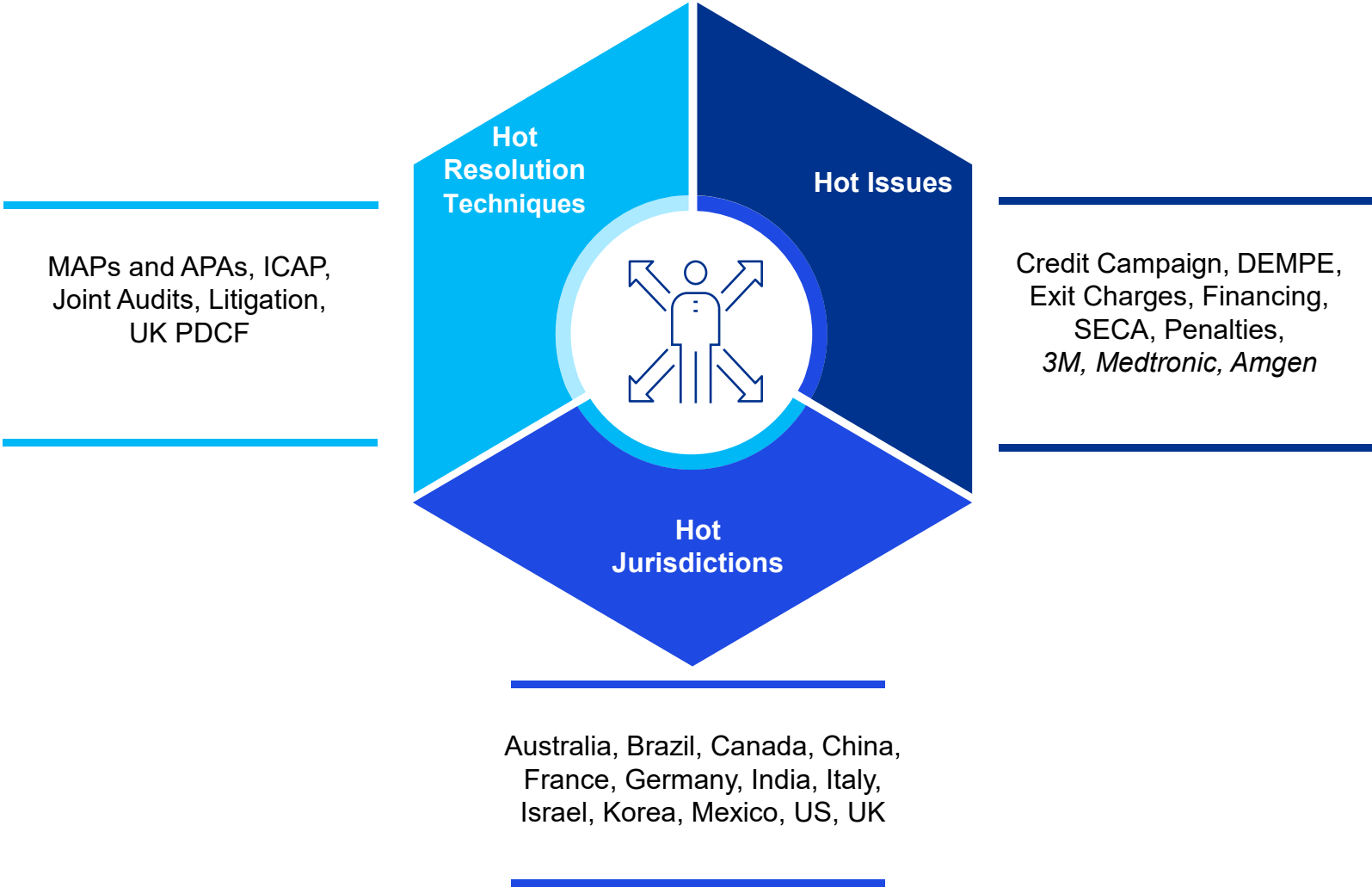
Does your revenue authority use technology for data & analytics? (For example, to develop/risk assess issues and/or taxpayers?)



Does your revenue authority use technology to conduct the inquiry itself?



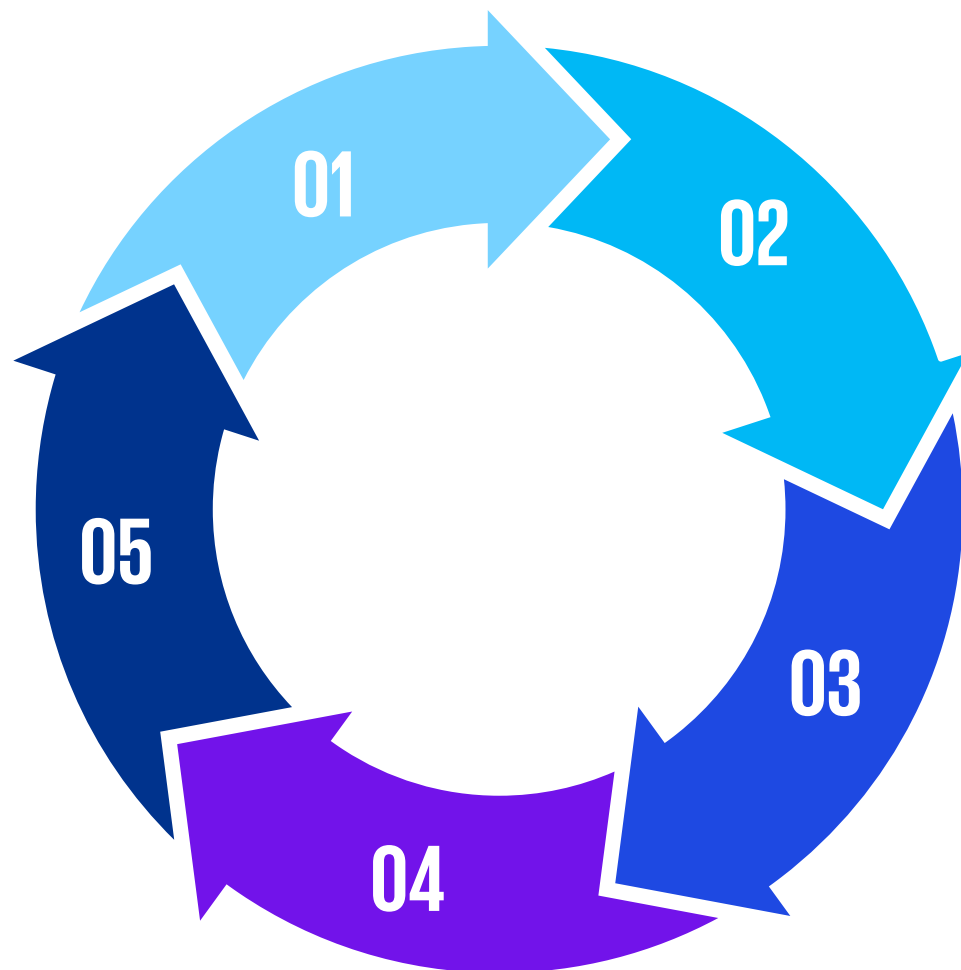
State of Global Controversy in 2023



02

Managing the Process

Managing the Process



Reserves & Forecasts

Documentation & Reporting

Framing & Developing Issues

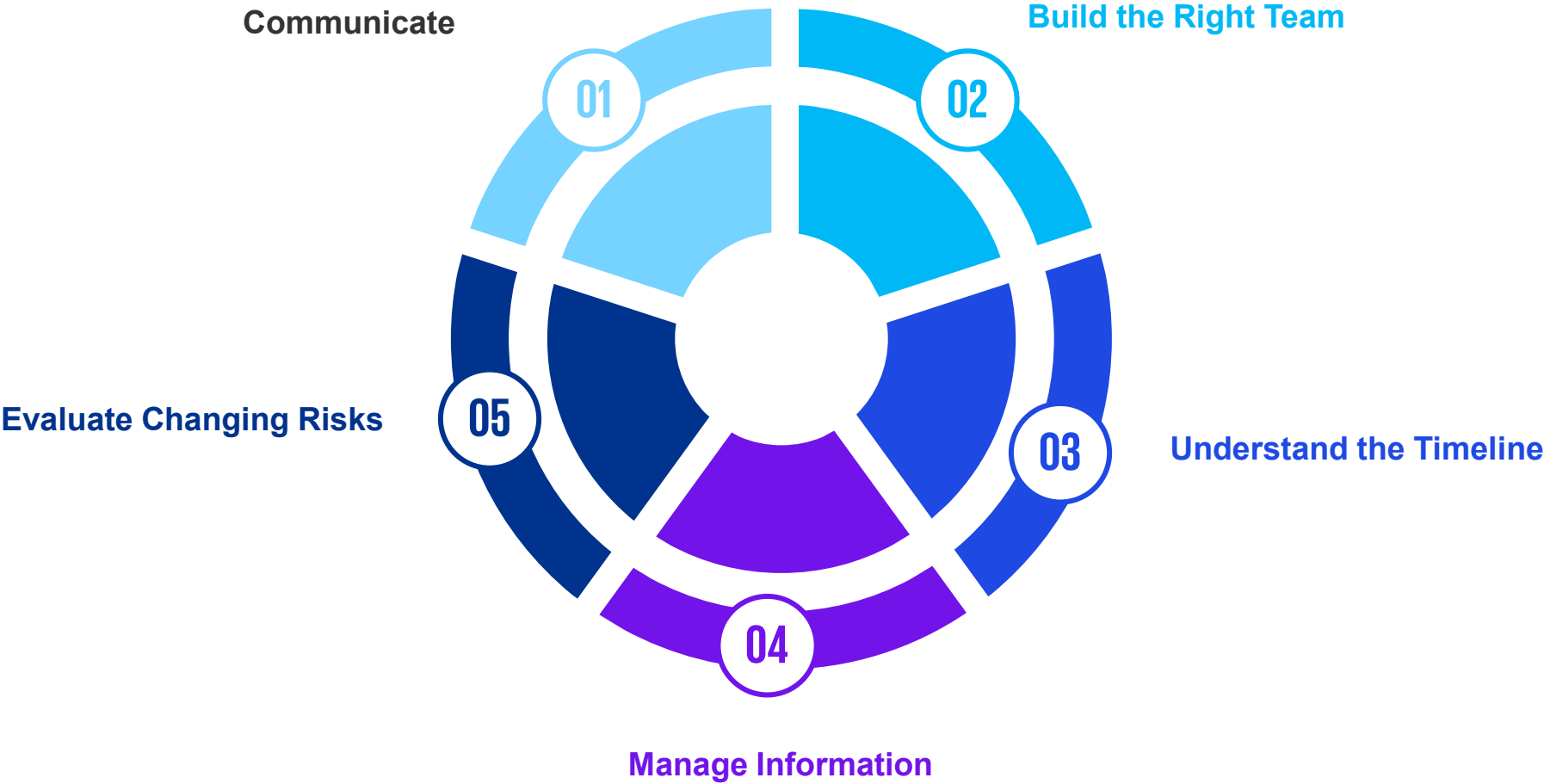
Managing Information & Data

Process Matters!

03

Managing Stakeholders

Managing Stakeholders



04 Resolution

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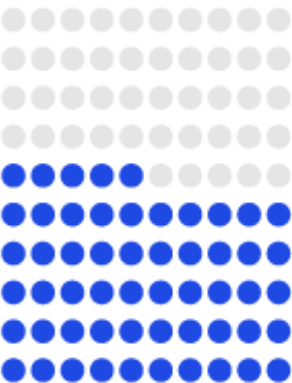
Key Factors Influencing Settlement of Tax Disputes

96%



Quantum of the dispute

55%



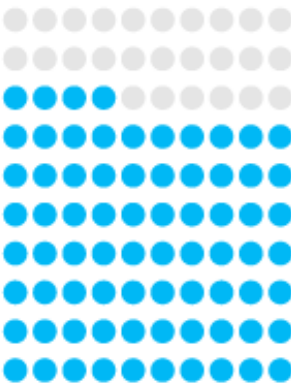
Timing of the dispute

91%



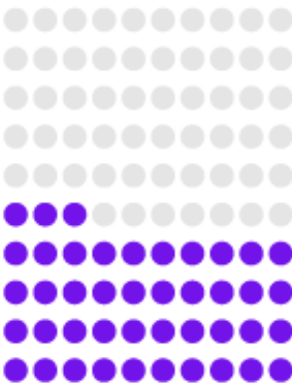
Impact of evidence

74%



Assessment of litigation risk

43%



External opinions/ counsel, etc.

Q&A

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Thank you!

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