

**SUPSI**

# Brief Outlook on International Taxation

## GILTI Inclusions (U.S.), BEPS 2 (OECD/G20), Digital Sales Tax (Italy)

### Dates & Times

Wednesday  
October 21, 2020  
16.00-18.30

Webinar

In this webinar devoted to actual subject matters affecting international tax law the speakers are David Rosenbloom, Tax Director of the ITP, NYU Law School, Joe Czajkowski, former Tax Counsel, Exxon/Mobile, Nicola Sartori, Professor in Tax Law Università degli Studi di Milano-Bicocca and Peter Altenburger, counsel at Altenburger Ltd. Künsnacht. David Rosenbloom will be addressing the issue whether GILTI (Global Intangible Low-Taxed Income), which upon its introduction in the context of the 2017 TCJA was heavily criticized may become a globally applied new tax standard. In July 2020, the OECD/G20 issued a Progress Report July 2019 - July 2020 entitled Inclusive Framework on BEPS. Joe Czajkowski will be addressing the Pillar 2, while Peter Altenburger will be addressing Pillar One issues. Nicola Sartori will provide first hand insights on the Italian DST, which was enacted January 1, 2020.

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rules. Calculation of the GILTI inclusion, involving the "net deemed tangible income return" and the 10% of the aggregate of a shareholder's pro rata share of the qualified business asset investment (QBAI) for each of its CFC's are utterly complicated. Corporate shareholders are entitled to deduct 50% of the sum of the GILTI inclusions plus the foreign tax gross-up, for an effective tax rate on GILTI income of 10.5%. In July 2020, the OECD/G20 issued a Progress Report July 2019 - July 2020 entitled Inclusive Framework on BEPS. Joe Czajkowski will be addressing the Pillar 2 ensuring a minimum level of taxation. Peter Altenburger will be addressing Pillar One issues, involving nexus and profit allocation. The Italian Budget Law 2020 provides for the entry into force of the Italian Digital Sales Tax, as of January 1, 2020. Nicola Sartori will provide firsthand insights on the Italian DST and explain why in his view Pillar One would be the preferable solution.

## Program

16.00-16.30

### GILTI inclusions

H. David Rosenbloom

Director of International Tax Program, New York University, and Partner at Caplin & Drysdale, Washington, DC

16.30-17.00

### Italian DST

Nicola Sartori

LL.M. e S.J.D., Michigan University, USA, Professore associato di diritto tributario presso l'Università di Milano-Bicocca

17.00-17.30

### OECD/G20 Pillar 2

Joseph Czajkowski

Former Senior Tax Counsel, Exxon Mobil Corporation, Irving, Texas

17.30-18.00

### OECD/G20 Pillar 1

Peter R. Altenburger

Attorney at Law, Zurich and Lugano

18.00-18.30

### Questions

## Target

Fiduciaries, accountants, lawyers and notaries, tax consultants, bank and insurance consultants, business managers, professionals involved in tax matters for private and public institutions, people interested in taxation

## Tuition fee

Free. Registration required

## Registration

<https://bit.ly/webinar-21-10-20>

## Registration deadline

Monday October 19, 2020

## Certificate of attendance

A certificate of attendance will be issued only upon request

## Observation

The participation link is strictly personal and non-transferable to third parties.

During the webinar there is the possibility for interact with the speakers.

## Administrative Information

SUPSI, Tax Law Competence Centre

[www.supsi.ch/fisco](http://www.supsi.ch/fisco)

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**Monday October 19, 2020**

By Post

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## Personal information

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