

Debate club: Tax principles

Residency vs. Source-based taxation: what's the right approach?

2024 KPMG Global Mobility Forum

28-30 October 2024

Austin, Texas, USA

Confirm your attendance

A letter of attendance will be sent to delegates following the event outlining the sessions you attended. This may be used for requesting CPE (or equivalent) credit. To receive this letter, you must confirm your attendance in each session.

To confirm your attendance in this session:

Open the event app and press the plus (+) button.

Select "Claim session attendance" and enter the session code at the top of this slide.



Residency versus source-based taxation: what's the right approach?

A change from residency-based to sourced-based taxation could represent one of the most significant changes to international tax rules and cooperation ever considered. What could an alternate approach mean for individuals, companies, and global mobility?

Residency based taxation

The current state, providing stability and predictability for both taxpayers and tax authorities.

But do modern work models require a rethink?

Sourced based taxation

A possible alternative, ensuring that income is taxed where it is generating, thereby promoting fairness.

But does the change come at a cost?



© 2024 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no service

Today's debaters



Dan Hodgson Partner

KPMG in Australia

T +61 8 9278 2053 E dghodgson@kpmg.com.au



Barbara Kinle Partner KPMG in Singapore

T +65 9752 0651 E bkinle@kpmg.com.sg



Christine Deveney

Director KPMG in the U.S.

T +1 407 563 2259 E cdeveney@kpmg.com



Fredrik Lundgren

Partner KPMG in Denmark

T +45 5374 7017 E fredrik.lundgren@kpmg.com

КРМС

Polling question 1

Q:

Traditional residence-based taxation systems are no longer fit for purpose in this new era of hybrid/flexible work arrangements.







Agree.

Modern work models require a more dynamic and fair approach to taxation that reflects where economic activities actually occur.

Disagree.

Residency-based taxation provides stability and predictability for both taxpayers and tax authorities.

Undecided.

I am hedging my bets until I hear more from your debaters!



Traditional residence-based taxation systems are no longer fit for purpose in this new era of hybrid/flexible work arrangements.



© 2024 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no services to

Polling question 1 revisited

Q: Traditional residence-based taxation systems are no longer fit for purpose in this new era of hybrid/flexible work arrangements.







Agree.

Modern work models require a more dynamic and fair approach to taxation that reflects where economic activities actually occur.

Disagree.

Residency-based taxation provides stability and predictability for both taxpayers and tax authorities.

Undecided.

I still don't know!!



Polling question 2

Q: As an alternative to residency, source-based taxation would improve tax equity and efficiency and reflect the realities of a globalized economy.







Agree.

Source-based systems can adapt better to the digital economy and cross-border work arrangements.

Disagree.

A hybrid model allows for flexibility in dealing with complex modern work arrangements and digital nomadism.

Undecided.

I am still hedging my bets until I hear more from your debaters!



As an alternative to residency, sourcebased taxation would improve tax equity and efficiency and reflect the realities of a globalized economy.



© 2024 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no services to

Polling question 2 revisited

Q: As an alternative to residency, source-based taxation would improve tax equity and efficiency and reflect the realities of a globalized economy.







Agree.

Source-based systems can adapt better to the digital economy and cross-border work arrangements.

Disagree.

A hybrid model allows for flexibility in dealing with complex modern work arrangements and digital nomadism

Undecided.

Yep - still unsure!!



Polling question 3

To align with the OECD BEPS project, a global minimum tax on individuals would ensure that high-income earners are subject to a minimum level of taxation regardless of their country of residence, thereby reducing tax avoidance, promoting global tax equity, and enhancing international cooperation.





Disagree.

unintended

such as

There could be

consequences,

economic activity in certain jurisdictions.

discouraging investment and



Agree. It promotes global tax equity.

Undecided.

I am hedging my bets until I hear more from your debaters!



A global minimum tax on individuals would ensure that high-income earners are subject to a minimum level of tax regardless of their country of residence, reducing tax avoidance, promoting global tax equity, & enhancing international cooperation.



Polling question 3 revisited

To align with the OECD BEPS project, a global minimum tax on individuals would ensure that high-income earners are subject to a minimum level of taxation regardless of their country of residence, thereby reducing tax avoidance, promoting global tax equity, and enhancing international cooperation.



0:



Disagree.

unintended

such as

There could be

consequences,

economic activity in certain jurisdictions.

discouraging investment and



Agree. It promotes global tax equity.

Undecided.

l'm too exhausted from the debate to decide.



Final polling question to wrap up

Q: Enter the ONE word that best describes this debate

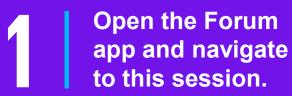




Provide feedback

Your feedback is important to us. It helps us shape future event sessions to meet your needs.

To provide feedback on this session:



Scroll down and select "Submit feedback".

B Respond to the questions and submit your feedback.





Some or all of the services described herein may not be permissible for KPMG audit clients and their affiliates or related entities.

kpmg.com



The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavour to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act on such information without appropriate professional advice after a thorough examination of the particular situation.

Throughout this presentation, "we", "KPMG", "us" and "our" refers to the global organization or to one or more of the member firms of KPMG International Limited ("KPMG International"), each of which is a separate legal entity.

© 2024 Copyright owned by one or more of the KPMG International entities. KPMG International entities provide no services to clients. All rights reserved.

KPMG refers to the global organization or to one or more of the member firms of KPMG International Limited ("KPMG International"), each of which is a separate legal entity. KPMG International Limited is a private English company limited by guarantee and does not provide services to clients. For more detail about our structure please visit <u>kpmg.com/governance</u>.

The KPMG name and logo are trademarks used under license by the independent member firms of the KPMG global organization.