



Tax controversy/handling  
a tax enquiry for the family  
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# Tax controversy/handling a tax enquiry for the family



**Michael Velten**  
Deloitte Singapore



**Chee Pei Pei**  
Deloitte Malaysia



**Frank Ke Xu**  
Deloitte China



**Dionisius Damijanto**  
Deloitte Indonesia



**Natalie Faul**  
Deloitte Australia



**Minh Bui**  
Deloitte Vietnam



**Carlo Navarro**  
Deloitte Philippines



**Vorasa Palsingh**  
Deloitte Thailand



- Pressure on tax authorities to collect money—a global trend (and certainly true of Asia Pacific)
- Increased tax enquires and tax audits (and tax disputes)
- Penalties and interest imposed (e.g. Australia)



- Automatic exchange of information— FATCA and CRS
- Increased focus on data collection and data analytics (e.g. e-Invoicing)



- Continued international focus on tax compliance and integrity of tax systems
- New initiatives—e.g. CARF and CRS 2.0
- Future reforms: OECD—Tax Transparency on Real Estate and Global Minimum Wealth Tax (?)



Who's affected & who else could be impacted further down the road

Is this the first contact on this matter?

Is this a surprise?

Is this sensitive to the family/the tax authorities & why?

Who else might get involved?

How long will this take & where will it end?



Past & current relationship with tax authorities?

What's the family's attitude towards tax & reputational risk?

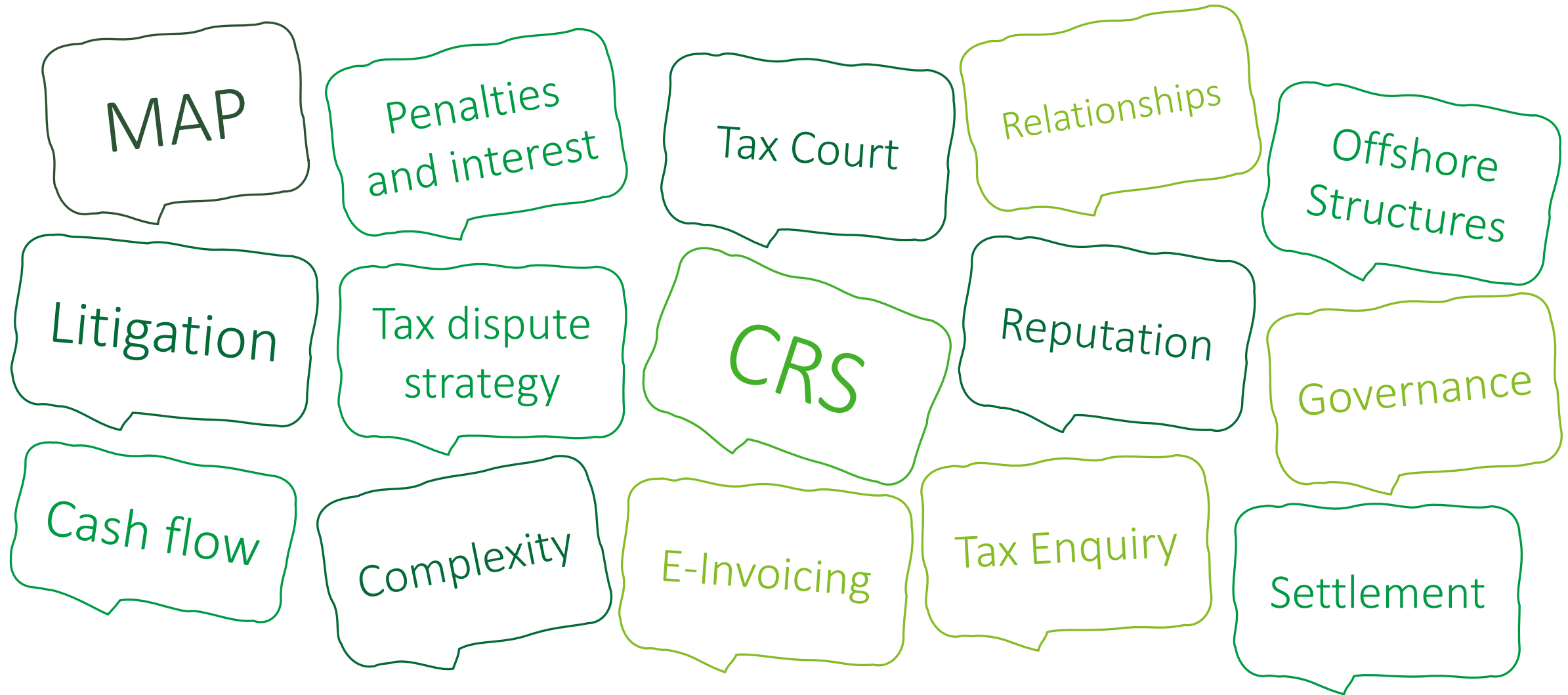
Is it consistent across the generations/branches?

Governance considerations: who signs off the responses & how do they get there?

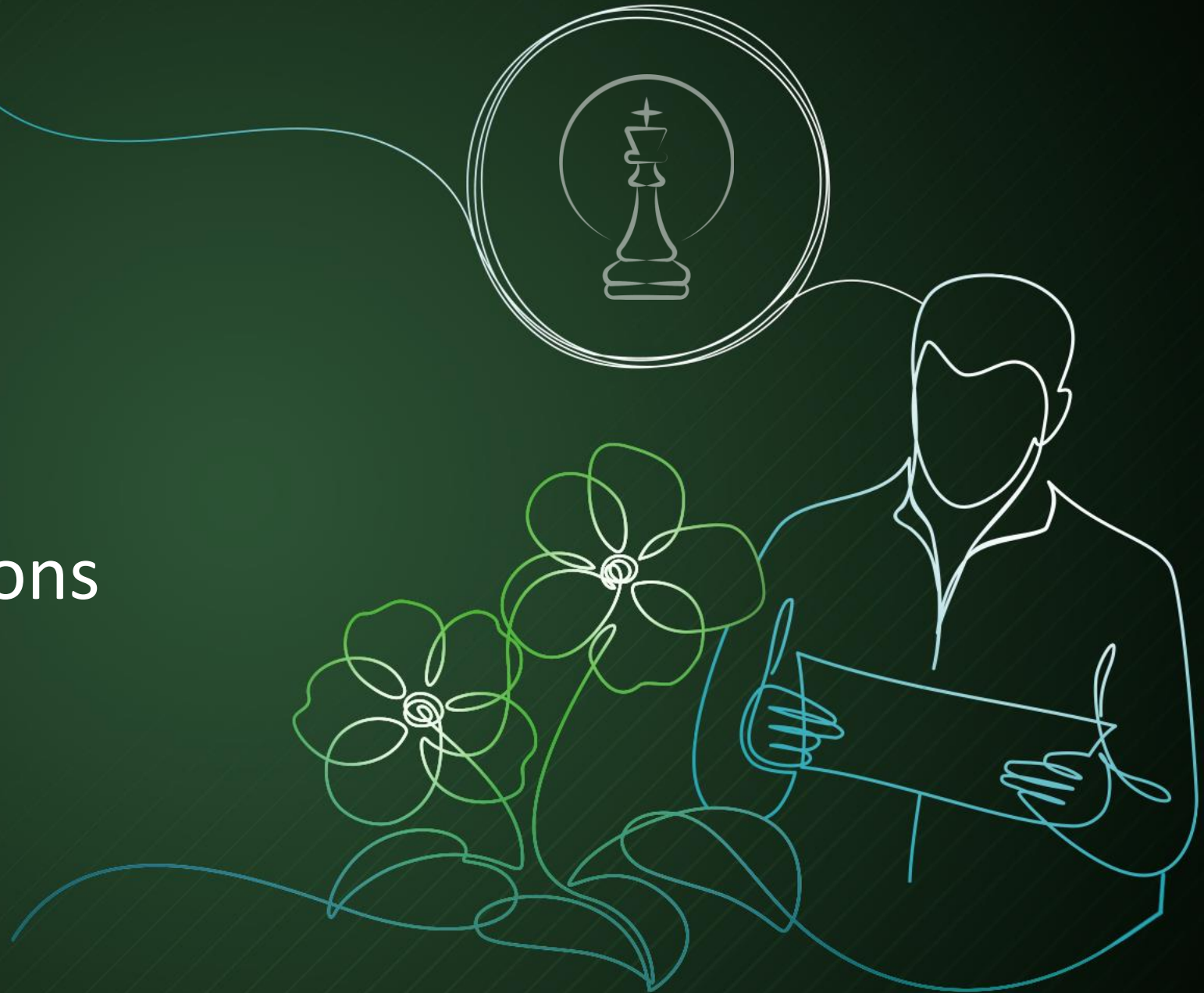
Are we in the right process?

Seeking advice from specialist internal/external advisers





# Tax Controversy Strategic Considerations



# What are the key aspects of a defence readiness strategy?



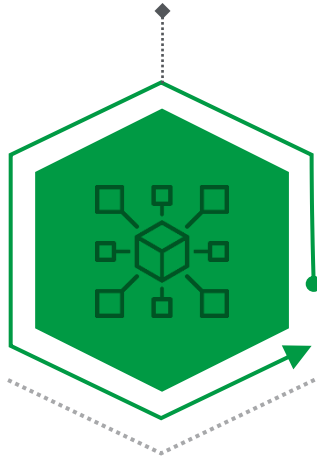
## Proactive approach

Prepare explanatory documents for high risk transactions of tax audit.



## Repository of key materials

Maintain a central repository to manage and retain key files.



## Management of process

Tracking and monitoring key internal and external milestones



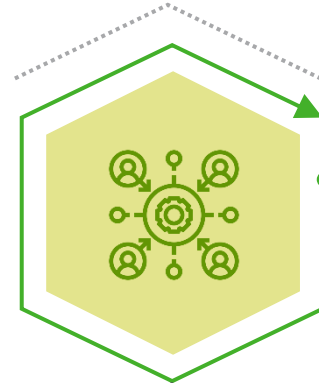
## Consistency message

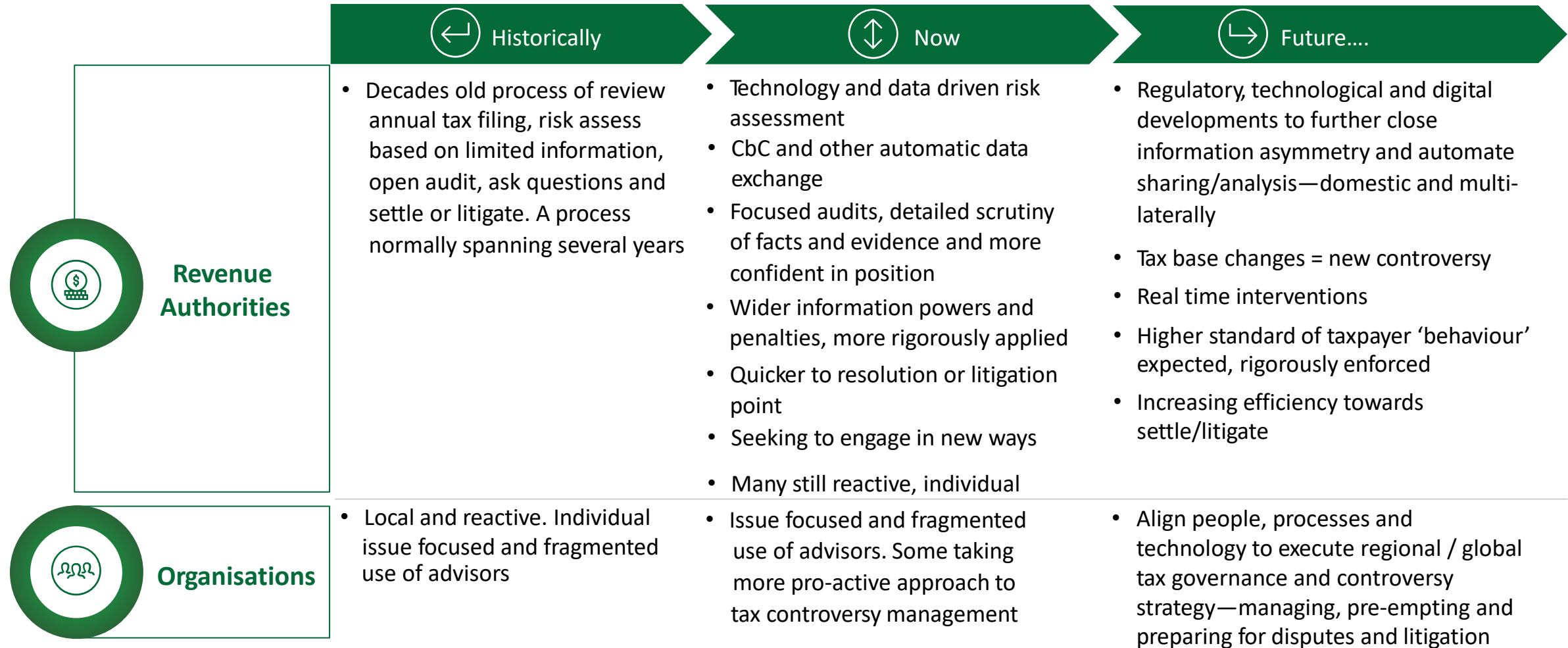
Create templates for specific information and consistent core messaging. Make sure local teams follow internal procedure.



## Clarity of process

Ensure that teams have clear and consistent guidance on the type of information that should be shared at various stages of an audit.







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