

Eva Frehner

Tax Reporting on Effective Tax Rate (IAS 12)

Interpretations, New Initiatives, International Best Practice and Correlations

Table of Contents

Acknowledgements.....	V
Table of Contents.....	IX
List of Figures.....	XV
List of Tables.....	XIX
List of Abbreviations.....	XXI
Abstract.....	XXIX
Zusammenfassung.....	XXX
Summary.....	XXXI
1 Introduction.....	1
1.1 Background and Problem Statement.....	1
1.2 Research Goals and Research Questions.....	7
1.3 Contributions.....	9
1.3.1 Theoretical Contribution.....	9
1.3.2 Practical Contribution.....	9
1.4 Structure of Dissertation.....	10
1.5 Research Design.....	11
2 Fundamentals of Tax Reporting and Literature Review.....	15
2.1 Fundamentals of Tax Accounting and Tax Reporting.....	15
2.1.1 Tax Accounting and Tax Reporting.....	15
2.1.1.1 Why Tax Reporting?.....	16
2.1.1.2 Tax accounting vs. Tax reporting.....	16
2.1.1.3 The Convergence project.....	18
2.1.1.4 The differences in tax accounting according to the IAS 12 and the ASC 740.....	19
2.1.2 The Origination of International Accounting Standards in 1973.....	27
2.1.3 Current Objectives of the IFRS.....	29
2.1.3.1 The Evolution of the First Standard for Accounting for Taxes on Income (1978–1998).....	30
2.1.3.2 The old IAS 12 Accounting for Income Taxes vs. the new IAS 12 Income Taxes.....	31
2.1.3.3 Amendments to the new IAS 12 Income Taxes after 2010.....	37
2.1.4 2022: Exposure Draft Related to the International Tax Reform (i.e., Pillar I and Pillar II).....	38
2.1.5 Definition and Conceptual Delimitation.....	40
2.2 Literature Review.....	45
3 Fundamentals of Tax Reporting in Australia, Germany, Switzerland, the UK, and the US.....	51
3.1 Selection Motivation.....	51
3.1.1 Countries.....	51
3.1.2 Companies.....	53
3.1.3 Years.....	54
3.2 Tax Reporting in Australia.....	55
3.2.1 Reporting Standard for Listed Companies.....	55
3.2.2 Institutional Framework for Financial Reporting in Australia.....	56
3.2.3 Interaction of the Australian Financial Reporting Institutions with IASB in the Recent Tax Reporting Initiatives.....	56

3.3	Tax Reporting in Germany	57
3.3.1	Reporting standard for listed companies.....	57
3.3.2	Institutional Framework for Financial Reporting in Germany.....	57
3.3.3	Interaction of the German Financial Reporting Institutions with the IASB in the Recent Tax Reporting Initiatives.....	58
3.4	Tax Reporting in Switzerland	59
3.4.1	Reporting standard for listed companies.....	59
3.4.2	Institutional Framework for Financial Reporting in Switzerland.....	60
3.4.3	Interaction of the Swiss Financial Reporting Institutions with the IASB in the Recent Tax Reporting Initiatives	60
3.4.4	Influence of SIX Stock Exchange on Tax Reporting in Switzerland.....	61
3.5	Tax Reporting in the UK	62
3.5.1	Reporting standard for listed companies.....	62
3.5.2	Institutional Framework for Financial Reporting in the UK	62
3.5.3	Interaction of the UK Financial Reporting Institutions with the IASB in the Recent Tax Reporting Initiatives	63
3.6	Tax Reporting in the USA	64
3.6.1	Reporting standard for listed companies.....	64
3.6.2	Institutional Framework for Financial Reporting in the USA.....	64
3.6.3	Interaction of the US Financial Reporting Institutions with the IASB in the Recent Tax Reporting Initiatives	65
3.7	Implications for this Dissertation.....	66
4	Theory Building and Hypothesis Development.....	69
4.1	Fundamentals of Tax Reporting.....	69
4.1.1	Who is the recipient?	70
4.1.2	Who is the preparer?.....	71
4.1.3	Periodicity	72
4.1.4	What kind of tax?	72
4.1.5	Financial vs. Non-financial Reporting.....	73
4.1.6	Mandatory vs. Voluntary Reporting	73
4.2	Shareholder Theory	73
4.3	Stakeholder Theory.....	74
4.4	Underlying theory of IFRS	74
4.5	Institutional Theory	75
4.6	Signalling Theory	76
4.7	Legitimacy Theory.....	77
4.8	Implications for this Research Project	78
4.8.1	Implication derived from Shareholder Theory.....	78
4.8.2	Implication derived from Stakeholder Theory	80
4.8.3	Implication derived from underlying theory of IFRS	81
4.8.4	Implication derived from Institutional Theory.....	82
4.8.5	Implication derived from Signalling Theory	82
4.8.6	Implication derived from Legitimacy Theory.....	83
4.9	Hypotheses Development	83
4.9.1	Hypothesis 1a and 1b.....	83
4.9.2	Hypothesis 2.....	84
4.9.3	Hypothesis 3a and Hypothesis 3b.....	84
5	Normative Analysis.....	87
5.1	IAS 12.....	87
5.1.1	Objective	87

5.1.1.1	General Interpretation.....	87
5.1.1.2	Interpretation in light of Swiss domestic and international tax law	88
5.1.2	Scope.....	89
5.1.2.1	General Interpretation.....	89
5.1.2.1.1	What are Income Taxes?.....	89
5.1.2.1.2	Accurate Delineation between the IAS 12 and the IAS 20.....	90
5.1.2.1.3	The Treatment of the WHT under the IAS 12	92
5.1.2.2	Interpretation in light of Swiss domestic and international tax law	96
5.1.3	Definitions.....	101
5.1.3.1	General Interpretation	101
5.1.3.1.1	Titles for Financial Statements	101
5.1.3.1.2	Accounting Profit	101
5.1.3.1.3	Taxable Profit (Tax Loss).....	102
5.1.3.1.4	Tax Expense (Tax Income).....	102
5.1.3.1.5	Current Tax.....	103
5.1.3.1.6	Deferred Tax.....	105
5.1.3.1.7	Valuation Differences.....	106
5.1.3.1.8	The Role of the OCI in Tax Accounting.....	110
5.1.4	Recognition	114
5.1.5	Measurement	119
5.1.6	Presentation and Disclosure in General	122
5.1.6.1	Presentation under the IAS 12	124
5.1.6.1.1	Offsetting of Current Taxes	124
5.1.6.1.2	Offsetting of Deferred Taxes	125
5.1.6.1.3	Tax Expense Related to Profit from Ordinary Activities.....	126
5.1.6.1.4	Exchange Differences on Deferred Foreign Tax Liabilities and Assets.....	127
5.1.6.2	Disclosure under the IAS 12.....	127
5.1.6.2.1	The Major Components of Tax Expense	128
5.1.6.2.2	Effective Tax Rate Reconciliation	129
5.1.6.2.3	Tax Rates	131
5.1.6.2.4	Tax through Equity and OCI.....	131
5.1.6.2.5	Overview of Tax Losses/Non-Recognised Tax Assets	132
5.1.6.2.6	Investments in Subsidiaries, Branches, Associates, and Interests in Joint Arrangements	132
5.1.6.2.7	Other Income Tax Disclosures	133
5.2	IFRIC 23	133
5.2.1	Objective	134
5.2.2	Income Taxes vs. Other Taxes, Duties, Penalties, and Interests	136
5.2.3	Provisions for Income Taxes	139
5.2.3.1	Separate or Cumulative Treatment of Uncertain Tax Positions	139
5.2.3.2	Examination by Taxation Authorities.....	141
5.2.3.3	Determination of Taxable Profit (Tax Loss), Tax Bases, Unused Tax Losses, Unused Tax Credits, and Tax Rates.....	142

5.2.3.4	The Most Likely Amount Method	143
5.2.3.5	The Expected Value Method	144
5.2.4	Consideration of Changes in Facts and Circumstances	150
5.2.5	Presentation of Liabilities and Assets Related to Uncertain Tax Positions	150
5.3	Interim Conclusion from a Normative Analysis	151
6	Qualitative Empirical Analysis	155
6.1	An Introduction to Content Analysis	155
6.2	Planning	157
6.3	Data Collection	157
6.4	Data Analysis	158
6.4.1	Phase 1: Decontextualisation via Coding	158
6.4.2	Phase 2: Recontextualisation through Comparison with the Original Data	159
6.4.3	Phase 3: Categorisation	160
6.4.4	Phase 4: Compilation	160
6.5	Presentation of Content Analysis Results	161
6.5.1	TAX NOTE SCORE	161
6.5.1.1	Frequency Statistics in General	161
6.5.1.2	Frequency Statistics – Categorisation of Results according to the Country of Listing	165
6.5.1.3	Frequency Statistics – Categorisation of Results according to the Industry	168
6.5.1.4	Frequency Statistics – Categorisation of Results according to the Audit Company	169
6.5.2	OTHER PARTS SCORE	170
6.5.2.1	Frequency Statistics in General	170
6.5.2.2	Frequency Statistics – Categorisation of Results according to the Country of Listing	173
6.5.2.3	Frequency Statistics – Categorisation of Results according to the Industry	176
6.5.2.4	Frequency Statistics – Categorisation of Results according to the Audit Company	177
6.6	Interim Conclusion from Content Analysis	178
6.7	Limitations of Content Analysis	180
7	Quantitative Empirical Analysis	181
7.1	Sample and Data	181
7.1.1	Sample	181
7.1.1.1	Year	182
7.1.1.2	Countries of Listing	182
7.1.1.3	Industries	184
7.1.1.4	Auditors	186
7.1.2	Data	187
7.2	Multi Variable Linear Regression Analysis	188
7.2.1	An Introduction to Regression Analysis	188
7.2.1.1	Regression Equation	189
7.2.1.2	General Statistical Significance	189
7.2.1.3	Normal Distribution of Residuals	190
7.2.1.4	Autocorrelations of Residuals	190
7.2.1.5	Heteroscedasticity	191

7.2.1.6	General Specification of the Model	191
7.2.1.7	Multicollinearity of Explanatory Variables	191
7.3	Relationship between Tested Variables	192
7.3.1	Model Formulation	192
7.3.2	Model Specification and Variable Definitions	193
7.3.3	Descriptive Statistics	198
7.3.4	Correlation Matrix	199
7.3.5	Sensitivity Analyses	201
7.4	Interim Conclusion from Regression Analysis	202
7.5	Limitations	203
8	Implications and Summary	205
8.1	Managerial Implication	205
8.2	Implication for Policymakers	206
8.3	Implication for Investors	207
8.4	Implication for Future Research	207
8.5	Summary	210
9	References	215
Annual reports	215	
Australian Companies listed in ASX	215	
German Companies listed in DAX	216	
Swiss Companies listed in SMI	216	
UK Companies listed in FTSE	217	
US Companies listed in the Dow Jones Index	218	
Conferences, seminars and symposia	219	
Court cases	220	
EU documents	220	
OECD, UN and related documents	220	
Reporting standards and related documents	223	
Research articles and other publications	224	
Appendix 1: Coding Framework	239	
Appendix 2: TAX NOTE SCORE – Frequency of Results	257	
Appendix 3: OTHER PARTS SCORE – Frequency of Results	258	
Appendix 4: Results per Each Question – Tax Note	259	
Appendix 5: Results per Each Question – Other Parts	285	
Appendix 6: Correlations – TAX NOTE SCORE	311	
Appendix 7: Correlations – OTHER PARTS SCORE	314	
Appendix 8: Descriptive Statistics per Country of Listing	317	
Appendix 9: Sensitivity Analysis	319	

List of Figures

Figure 1:	Research questions (own illustration)	8
Figure 2:	Practical contribution (own illustration).....	10
Figure 3:	The PhD thesis structure (own illustration).....	11
Figure 4:	Methodological research design (own illustration)	13
Figure 5:	The Difference between Tax Accounting and Tax Reporting (own illustration).....	17
Figure 6:	The objectives agreed in the founding agreement (own illustration).....	28
Figure 7:	IAS 12 – Comparison of timing difference (own illustration).....	32
Figure 8:	IAS 12 – Comparison of DTA recognition approaches (own illustration).....	32
Figure 9:	IAS 12 – Comparison of DTL recognition on distributed profits of subsidiaries (own illustration)	33
Figure 10:	IAS 12 – Comparison of DTA and DTL recognition in business combinations (own illustration).....	34
Figure 11:	IAS 12 – Comparison of DTL recognition requirements after asset revaluation (own illustration)	34
Figure 12:	IAS 12 – Guidance on measurement of DTA and DTL in different ways of recovery or settlement (own illustration)	35
Figure 13:	IAS 12 – Discounting of DTAs and DTLs (own illustration)	35
Figure 14:	IAS 12 – Classification of DTA and DTLs in Balance Sheet (own illustration).....	35
Figure 15:	IAS 12 – Offsetting (own illustration).....	36
Figure 16:	IAS 12 – Requirements on reconciling items and change in applicable tax rates (own illustration)	36
Figure 17:	IAS 12 – New disclosures (own illustration).....	37
Figure 18:	Timeline proposed by the IASB for additional targeted disclosures (ASAF Forum).....	39
Figure 19:	MNEs that provided comments to IASB (own illustration)	40
Figure 20:	Overview of literature about ETR – Venn diagram (own illustration)	48
Figure 21:	Relationship Map with Countries and Auditors (own illustration).....	52
Figure 22:	Relationship Map with Countries and Industries (own illustration).....	53
Figure 23:	Categorisation of tax reporting (own illustration)	70
Figure 24:	Implications derived from the Shareholder theory (Causal theory) (own illustration).....	79
Figure 25:	Libby box framework for depicting how this empirical study tests the Shareholder theory (own illustration).....	80
Figure 26:	Implications derived from the Stakeholder theory (Causal theory) (own illustration).....	81
Figure 27:	Libby box framework for depicting how empirical study tests the stakeholder theory (own illustration).....	81
Figure 28:	Scope of IAS 12 (own illustration).....	103
Figure 29:	The seven-step process determining the current tax provision (own illustration).....	105
Figure 30:	The differences between IFRS individual financial statements and tax balance sheet (own illustration)	107
Figure 31:	Example Uncertain Tax Position (own illustration).....	146
Figure 32:	An overview of the process of a qualitative content analysis used in this PhD project (own illustration).....	156

Figure 33:	Histogram – Frequency of TAX NOTE SCORES from Content Analysis (Panel A) (own illustration)	164
Figure 34:	Boxplot – Comparison of TAX NOTE SCORE categorised according to the country of listing (own illustration)	166
Figure 35:	Boxplot – Comparison of TAX NOTE SCORE categorised according to the country of listing and industry (own illustration).....	167
Figure 36:	Boxplot – Comparison of TAX NOTE SCORE categorised according to the industry (own illustration)	168
Figure 37:	Boxplot – Comparison of TAX NOTE SCORE categorised according to the audit company (own illustration).....	170
Figure 38:	Histogram – Frequency of Scores from Content Analysis (Panel B) (own illustration).....	173
Figure 39:	Boxplot – Comparison of OTHER PARTS SCORE categorised according to the country of listing (own illustration)	174
Figure 40:	Boxplot – Comparison of OTHER PARTS SCORE categorised according to the country of listing and industry (own illustration).....	175
Figure 41:	Boxplot – Comparison of OTHER PARTS SCORE categorised according to the industry (own illustration)	176
Figure 42:	Boxplot – Comparison of OTHER PARTS SCORE categorised according to the audit company (own illustration).....	178
Figure 43:	Comparison of Market Capitalisation of Analysed Sample per Country (own illustration).....	184
Figure 44:	The Representation of Industries in the Data Sample (own illustration)	186
Figure 45:	The Representation of Auditors in the Data Sample (own illustration)	187
Figure 46:	Comparison of Scores from Question 1 – Tax Note (own illustration).....	259
Figure 47:	Comparison of Scores from Question 2 – Tax Note (own illustration).....	260
Figure 48:	Comparison of Scores from Question 3 – Tax Note (own illustration).....	261
Figure 49:	Comparison of Scores from Question 4 – Tax Note (own illustration).....	262
Figure 50:	Comparison of Scores from Question 5 – Tax Note (own illustration).....	263
Figure 51:	Comparison of Scores from Question 6 – Tax Note (own illustration).....	264
Figure 52:	Comparison of Scores from Question 7 – Tax Note (own illustration).....	265
Figure 53:	Comparison of Scores from Question 8 – Tax Note (own illustration).....	266
Figure 54:	Comparison of Scores from Question 9 – Tax Note (own illustration).....	267
Figure 55:	Comparison of Scores from Question 10 – Tax Note (own illustration).....	268
Figure 56:	Comparison of Scores from Question 12 – Tax Note (own illustration).....	269
Figure 57:	Comparison of Scores from Question 13 – Tax Note (own illustration).....	270
Figure 58:	Comparison of Scores from Question 14 – Tax Note (own illustration).....	271
Figure 59:	Comparison of Scores from Question 15 – Tax Note (own illustration).....	272
Figure 60:	Comparison of Scores from Question 16 – Tax Note (own illustration).....	273
Figure 61:	Comparison of Scores from Question 18 – Tax Note (own illustration).....	274
Figure 62:	Comparison of Scores from Question 19 – Tax Note (own illustration).....	275
Figure 63:	Comparison of Scores from Question 21 – Tax Note (own illustration).....	276
Figure 64:	Comparison of Scores from Question 22 – Tax Note (own illustration).....	277
Figure 65:	Comparison of Scores from Question 23 – Tax Note (own illustration).....	278
Figure 66:	Comparison of Scores from Question 24 – Tax Note (own illustration).....	279
Figure 67:	Comparison of Scores from Question 25 – Tax Note (own illustration).....	280
Figure 68:	Comparison of Scores from Question 27 – Tax Note (own illustration).....	281
Figure 69:	Comparison of Scores from Question 28 – Tax Note (own illustration).....	282
Figure 70:	Comparison of Scores from Question 29 – Tax Note (own illustration).....	283
Figure 71:	Comparison of Scores from Question 2 – Other Parts (own illustration).....	285
Figure 72:	Comparison of Scores from Question 3 – Other Parts (own illustration).....	286

Figure 73:	Comparison of Scores from Question 4 – Other Parts (own illustration).....	287
Figure 74:	Comparison of Scores from Question 6 – Other Parts (own illustration).....	288
Figure 75:	Comparison of Scores from Question 7 – Other Parts (own illustration).....	289
Figure 76:	Comparison of Scores from Question 9 – Other Parts (own illustration).....	290
Figure 77:	Comparison of Scores from Question 10 – Other Parts (own illustration).....	291
Figure 78:	Comparison of Scores from Question 11 – Other Parts (own illustration).....	292
Figure 79:	Comparison of Scores from Question 12 – Other Parts (own illustration).....	293
Figure 80:	Comparison of Scores from Question 13 – Other Parts (own illustration).....	294
Figure 81:	Comparison of Scores from Question 15 – Other Parts (own illustration).....	295
Figure 82:	Comparison of Scores from Question 16 – Other Parts (own illustration).....	296
Figure 83:	Comparison of Scores from Question 17 – Other Parts (own illustration).....	297
Figure 84:	Comparison of Scores from Question 18 – Other Parts (own illustration).....	298
Figure 85:	Comparison of Scores from Question 19 – Other Parts (own illustration).....	299
Figure 86:	Comparison of Scores from Question 20 – Other Parts (own illustration).....	300
Figure 87:	Comparison of Scores from Question 21 – Other Parts (own illustration).....	301
Figure 88:	Comparison of Scores from Question 22 – Other Parts (own illustration).....	302
Figure 89:	Comparison of Scores from Question 23 – Other Parts (own illustration).....	303
Figure 90:	Comparison of Scores from Question 24 – Other Parts (own illustration).....	304
Figure 91:	Comparison of Scores from Question 25 – Other Parts (own illustration).....	305
Figure 92:	Comparison of Scores from Question 26 – Other Parts (own illustration).....	306
Figure 93:	Comparison of Scores from Question 27 – Other Parts (own illustration).....	307
Figure 94:	Comparison of Scores from Question 28 – Other Parts (own illustration).....	308
Figure 95:	Comparison of Scores from Question 29 – Other Parts (own illustration).....	309
Figure 96:	Comparison of Scores from Question 30 – Other Parts (own illustration).....	310
Figure 97:	Scatterplot – Correlation of the TAX NOTE SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to the country of listing (own illustration)	311
Figure 98:	Scatterplot – Correlation of the TAX NOTE SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to the industry classification (own illustration).....	312
Figure 99:	Scatterplot – Correlation of the TAX NOTE SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to the auditing company (own illustration).....	313
Figure 100:	Scatterplot – Correlation of the OTHER PARTS SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to the country of listing (own illustration).....	314
Figure 101:	Scatterplot – Correlation of the OTHER PARTS SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to industry classification (own illustration)	315
Figure 102:	Scatterplot – Correlation of the OTHER PARTS SCORE with ETR, Market Capitalisation, and Presence in Countries. Categorised according to auditing company (own illustration).....	316

List of Tables

Table 1:	The Overview of GloBE rules (own illustration)	5
Table 2:	The Differences between Tax Reporting according to IAS 12 and ASC 740 (own illustration)	27
Table 3:	Non-Financial Tax Reporting Requirements of GRI: 207 Tax (own illustration).....	44
Table 4:	Classification of literature about ETR (own illustration)	49
Table 5:	Indicators for Investment Tax Credits (own illustration)	91
Table 6:	A summary of the parameters used to identify temporary differences when comparing book and tax values (own illustration)	109
Table 7:	Calculation of Tax Provisions – Expected Value method (own illustration).....	147
Table 8:	Calculation of Tax Provisions – Cumulative Probability method (ASC 740) (own illustration).....	149
Table 9:	The overview of categories used for grouping the content analysis results (own illustration).....	160
Table 10:	Frequency Statistics – Score from IAS 12 content analysis (Tax Note) – Panel A (own illustration).....	163
Table 11:	Case Processing Summary for Boxplots, grouped according to the country of listing – TAX NOTE SCORE (own illustration).....	165
Table 12:	Case Processing Summary for Boxplots, grouped according to the industry – TAX NOTE SCORE (own illustration).....	168
Table 13:	Case Processing Summary for Boxplots, grouped according to the audit company – TAX NOTE SCORE (own illustration)	169
Table 14:	Frequency Statistics – Score from IAS 12 content analysis (OTHER PARTS) – Panel A (own illustration)	172
Table 15:	Case Processing Summary for Boxplots – OTHER PARTS SCORE (own illustration).....	174
Table 16:	Case Processing Summary for Boxplots, grouped according to the industry – OTHER PARTS SCORE (own illustration).....	176
Table 17:	Case Processing Summary for Boxplots, grouped according to the audit company – OTHER PARTS SCORE (own illustration).....	177
Table 18:	Selection of Tested Companies (own illustration).....	184
Table 19:	The Representation of SIC Codes in the Data Sample (own illustration).....	185
Table 20:	The Representation of Auditors in the Data Sample (own illustration).....	186
Table 21:	Comparison of correlation with regression (own illustration).....	188
Table 22:	Descriptive Statistics of Continuous Variables – Total Sample (own illustration).....	198
Table 23:	Pearson Correlation Coefficients of All Variables (own illustration).....	200
Table 24:	The frequency (in % and absolute figures) of individual results obtained by each tested MNE in the TAX NOTE SCORE (own illustration).....	257
Table 25:	The frequency (in % and absolute figures) of individual results obtained by each tested MNE (own illustration)	258
Table 26:	Descriptive Statistics of Continuous Variables – Australia (own illustration).....	317
Table 27:	Descriptive Statistics of Continuous Variables – Germany (own illustration).....	317

List of Tables

Table 28:	Descriptive Statistics of Continuous Variables – Switzerland (own illustration).....	317
Table 29:	Descriptive Statistics of Continuous Variables – UK (own illustration).....	317
Table 30:	Descriptive Statistics of Continuous Variables – USA (own illustration).....	318
Table 31:	R ² values – Regression Equation with All Variables (own illustration).....	319
Table 32:	R ² values for the equation without the explanatory variable ETR (own illustration).....	320
Table 33:	R ² values for the equation without the explanatory variable MC (own illustration).....	321
Table 34:	R ² values for the equation without the explanatory variable MC (own illustration).....	322