

PRE-EMPTIVE DISCUSSION

GOALS

- To survey the taxpayer's need for guidance
- To guide the taxpayer through tax legislation before the company starts implementing its business plans
- To increase the predictability and legal certainty of the taxpayer's taxation
- To avoid heavy and time-consuming appeal processes and court proceedings
- To decrease the taxpayer's administrative burden
- To enhance transparency of VERO's actions

COMPANY = Limited liability company, association or other organisation

VERO = Finnish Tax Administration

PREPARATIONS

- COMPANY**
- Tells what they are planning to do and why
 - States its own view on the taxation of the case and of any tax-related problems
 - Can provide material in advance

- VERO**
- Should have reasonable time to familiarize itself with the material provided

MEETING(S)

- COMPANY**
- The key aspect of the meeting is to clarify the questions and matters related to taxation as well as single out possible tax risks
 - Several meetings may be held
 - The meeting can be held on the company's or VERO's premises or as a Teams meeting
- VERO**

AFTER

- COMPANY**
- Additional questions and matters can be discussed and handled, e.g. via secured e-mail or phone

- COMPANY**
- May change its original plan according to the guidance provided by VERO

- VERO**
- Keeps the company informed of the processing schedule and phase
 - Prepares a written memorandum after the process has ended
 - Can advise the company to request an appealable advance ruling if the issue is open to interpretation, if there is no tax practice relevant to the case or if there is no agreement on the interpretation of the law

MEMORANDUM

- May also include a written guidance
- The company can disagree with VERO on the guidance
- In cross-border cases, VERO may be obliged to deliver written guidance binding to it to the OECD's and EU's registers.