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Diverted profits tax disputes will come into real focus this year. For many early cases, much of the one year 'review period' where negotiation and agreement are expected will be during 2017. This is new ground. HMRC is likely to seek to apply new guidance publicized following BEPS to existing transfer pricing enquiries.

Expected judgments of the Supreme Court may lead to very significant time being absorbed in additional VAT disputes with many taxpayers. To settle issues, it is now clearer than ever that persuading all HMRC stakeholders, and the time needed for HMRC's governance process, must be taken very seriously.

Read more: [Tax disputes in 2017](#)

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