

Internet Appendix A20: Taxation

Figure A20.1 Illustrative Pitch Template Example on Legitimacy of Current Corporate Tax Practices

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(A) Working Title	Understanding the emergence, adoption and perceived impacts of corporate tax practices in Australia		
(B) Basic Research Question	How legitimate are current corporate tax practices in Australia?		
(C) Key paper(s)	<ul style="list-style-type: none"> • DOWLING, G. R. 2013. The curious case of corporate tax avoidance: Is it socially irresponsible? <i>Journal of Business Ethics</i>. • GRACIA, L. & OATS, L. 2012. Boundary work and tax regulation: A Bourdieusian view. <i>Accounting Organizations and Society</i>, 37, 304-321. • MALSCH, B. 2013. Politicizing the expertise of the accounting industry in the realm of corporate social responsibility. <i>Accounting Organizations and Society</i>, 38, 149-168. • TING, A. 2014. iTax - Apple's International Tax Structure and the Double Non-Taxation Issue. <i>British Tax Review</i>, 1, 40-71. 		
(D) Motivation/Puzzle	Tax practices have entered debates on business ethics and as a consequence, companies' tax conducts are not so much challenged on legal grounds but rather on their ethical content. While certain corporate tax practices sit in a gray-zone of ethical acceptability, practitioners and policy-makers need to take clear positions on what is an appropriate corporate tax conduct. This study will inform these actors by examining the legitimacy of current corporate tax practices as understood by the broad range of stakeholders constituting the Australian corporate tax system.		
THREE	Three core aspects of any empirical research project i.e. the “ IDioTs ” guide		
(E) Idea?	Taxation has been said to have particular connotations that makes it difficult to locate within CSR. However, there has been a mounting debate about the relevancy of tax issues within the CSR agenda. Different scholars offer diverse interpretations on what a legitimate corporate tax conduct may look like and what reasoning should inform ethical tax strategies. Extant empirical studies have been only able to examine one perspective at the time and therefore have missed field's variations, including how legitimacy is formed through social interactions. This study will bypass theoretical debates on legal vs. ethical boundaries of acceptability and instead will investigate how the legitimacy of corporate tax practices is constructed by the very actors which compose the Australian corporate tax field.		
(F) Data?	Data for this study will be excerpted from the understanding of four different stakeholder groups composing the Australian corporate tax field: i) Tax governance – i.e. ATO, ANAO, Parliament, Treasury and International Organizations; ii) Corporate tax payers – i.e. tax directors; iii) Professional tax advisers – including accrediting bodies; iv) Civil society – i.e. NGOs, Political think-tanks, journalists and academics		
(G) Tools?	Following a Bourdieusian approach, legitimacy will be analysed by: i) Identifying the actors composing the Australian corporate tax field; ii) Characterizing the perceived political hierarchy within the field; iii) Understanding which assumptions (i.e. doxa) drive the emergence of certain practices. These factors will substantiate the legitimacy/illegitimacy of corporate tax practices as perceived by the range of stakeholders identified above.		

	This study triangulates data acquired from interviews, documentary analysis and observations.
TWO	Two key questions
(H) What's New?	<ul style="list-style-type: none"> • Idea: The reason why taxation hardly fits into a CSR framework has been theorized but not yet explored empirically. This work will attempt to disclose underlying assumptions and contextual socially-constructed factors behind such claim. • Data: This work brings together the perspectives of a broad range of stakeholders including the views of civil society which has been traditionally disregarded in the analysis of tax practices. This is due to the fact that civil society is not identified as a stakeholder of the tax field by the legal system, nevertheless civil society is currently playing a role in the push towards responsible business practices. • Tools: Interviews and observations have rarely been used in the investigation of corporate tax practices; in fact they have not been employed in combination for an analysis of tax practices within an ethical framework.
(I) So What?	While theoretical debates are inconclusive on whether corporations are contributing their fair share of tax to society, governance decisions are made accordingly to what seems to be the most compelling argument. Some decision-makers on one hand advocate for lower tax rates to foster investments while others suggest that increasing investments do not offset the negative impacts on social welfare that lower revenues of state budgets produce. Arguably, in a democratic system, policy makers need to be informed by a broad range of perspectives. This study contributes to the Australian debate and facilitates more informed decisions for policy-makers as well as practitioners.
ONE	One bottom line
(J) Contribution?	Potential contributions to the accounting literature include a mapping of the Australian tax system, including actors at play, perceived hierarchies and a detailed description of the assumptions driving the field. By looking into a specific context, this work will show how specific characteristics might enable/curb the legitimization/delegitimization of practices. The literature on professions will gain from the characterization of tax advisors understanding of CSR which is a neglected topic said to be of critical importance due to the influence of professionals on corporate conducts. Again, with regards of tax advisory, this work answers the call for a more critical analysis of tax advisors' influence in shaping (social) institutions. This will also complement the CSR literature by showing whether tax advisors feel a 'shared responsibility' for the impacts that their services might impose on society. Also, emerging literature on institutional hybrids which have discussed how practitioners cope differently with conflicting logics in business settings will be integrated with insights how participants in the study deal with different institutional requirements (i.e. commercial vs social vs professional).
(K) Other Considerations	<ul style="list-style-type: none"> • Targets: Accounting, Organizations and Society, Journal of Business Ethics, Critical Perspectives on Accounting. • Risks: Access for observations might be denied; in that case the study will be based solely on interviews and documentary analysis. These are still appropriate and satisfactory methods of inquiry for the scope of the study. • Ethics: Anonymity and confidentiality will be guaranteed for all participants. • Scope: Admittedly broad but given the abductive nature of the study, it will gain more focus after the first inductive phase (i.e. preliminary analysis of interviews).