

Beyond Tax

Helping tax and finance leaders prepare for what's next

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forvis mazars

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Foreword

Why the future of tax demands a different perspective

The pace of change facing businesses is relentless. Technology is reshaping what is possible, geopolitical tensions are challenging established assumptions and an increasingly complex regulatory landscape is making long-term planning more difficult. For CFOs and Heads of Tax, the challenge is not only to respond to these developments, but to anticipate their implications and identify opportunities for the wider business.

Tax has an important role to play in navigating this uncertainty. Its contribution extends well beyond compliance and risk management, influencing decisions about where businesses invest, how they operate and where they grow. Bringing tax specialists into these discussions earlier can help reveal risks, opportunities and commercial implications that might otherwise be overlooked.

In our first edition of ***Beyond Tax***, we explore emerging areas where a broader perspective is particularly valuable. AI and digital technologies are creating opportunities to transform how tax functions operate, while regulatory change brings uncertainty, demanding greater foresight and adaptability. At the same time, international expansion is bringing tax, trade and supply chain considerations ever closer together, making collaboration across business functions increasingly important.

Throughout the publication, alongside perspectives from experienced tax professionals, we share practical priorities for the next two years and real-world examples of how organisations are responding.

Our ambition for ***Beyond Tax*** is to encourage fresh thinking about the role of tax; challenge established approaches and help tax and finance leaders contribute more effectively to business strategy.

We hope you find this first edition valuable and look forward to helping you prepare for what's next.



Anja Spitzenberg
Group Head of Tax*
Forvis Mazars



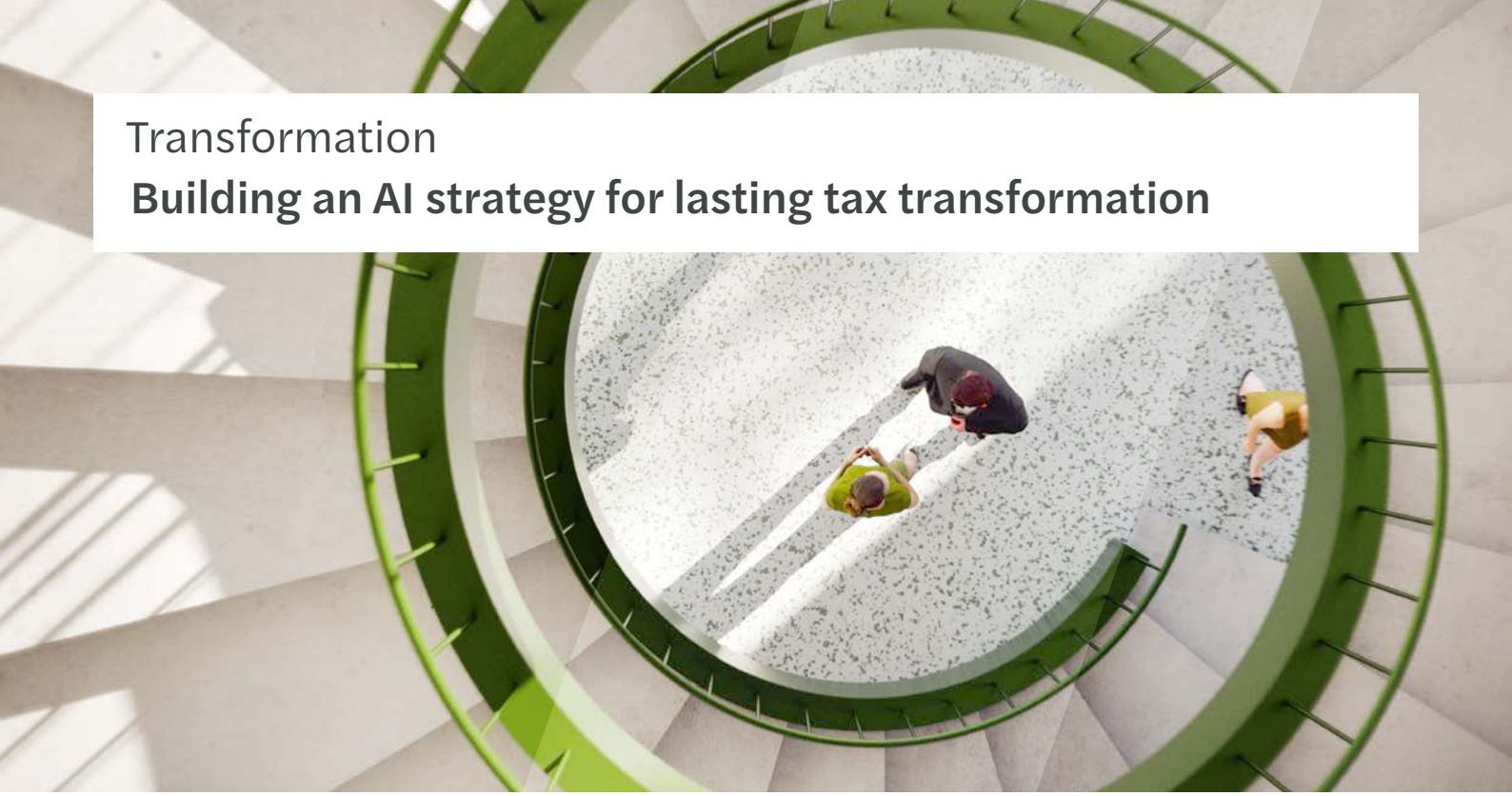
Trey Ackerman
National Service Leader for Tax
Forvis Mazars in the U.S.

*delegate – from 1 January 2027

Explore our latest global insights for tax leaders

Transformation

Building an AI strategy for lasting tax transformation



Artificial intelligence (AI) and new digital tools are helping organisations understand how technology can make parts of the tax function more productive. But lasting transformation requires integrating technology that is connected, reliable and adds value across the business.

It requires CFOs and heads of tax to rethink operating models, treat data as a strategic asset, focus on change management, apply governance guardrails and take ownership of initiatives. With the right foundations in place, advanced technologies can add sustainable value across the entire tax function.

One of the biggest challenges when adopting technology to transform the tax function remains getting started. Taking AI as an example, many organisations recognise its potential but struggle to identify the right first use case, often beginning by choosing a specific process to automate and then applying an AI capability to it. While the use case may be sensible, it can sit within a weak overall data and systems environment. The result can be disconnected improvements without the support of a coherent operating model.

Scaling AI safely across the tax function

Increasingly, developing an AI data strategy requires redesigning the underlying data architecture, automating connected processes and analysing how advanced technologies can create value across the entire tax function. It also requires organisations to implement a change management cycle that builds AI trust, integrates new technology into processes and addresses stakeholder impacts.

Equally, it's important to balance implementation speed with risk and engage the right people to deliver meaningful change. It starts by choosing a project with enough impact to demonstrate value, while assembling the internal and external partnerships needed to scale it. Better data and systems allow tax teams to understand positions much closer to real time and test future scenarios. When information arrives while there is still time to influence the decision, it fundamentally changes the contribution tax can make across the business.

Building an AI strategy for lasting tax transformation

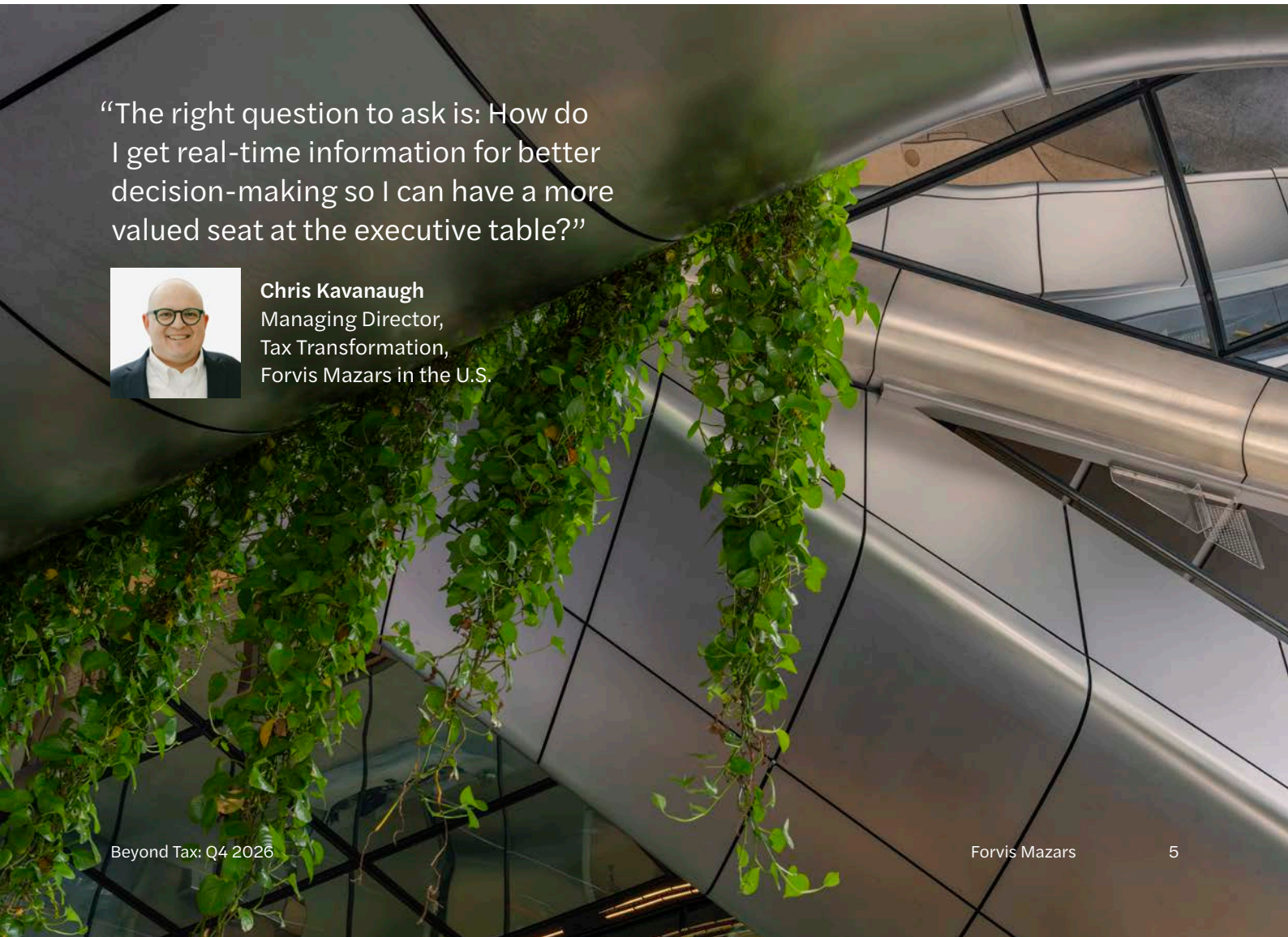
In addition, new specialist capabilities in data architecture, data engineering, AI and pipeline management will be required to bridge any skills gap and should be incorporated into the change management process. Putting the right governance guardrails in place is equally important. The key to safe use of AI and emerging technologies is to review and update governance frameworks so they can be scaled with control and visibility.

The implication for tax leaders is clear. Adopting new technology is no longer just about making the tax function more productive; it increasingly underpins broader organisational transformation. It's an approach that demands leadership, investment, collaboration and a willingness to challenge familiar ways of working.

Making tax information reliable and accessible

Treating data as a strategic asset is essential. For tax functions seeking sustainable transformation, the starting point is not the latest tool but the quality, structure and accessibility of the information behind it. As digital reporting requirements develop, the quality of the underlying transactional data becomes more important.

Tax departments have traditionally operated across multiple systems, often managing different tax, VAT and reporting obligations through separate technology and data sources. This fragmentation creates a significant challenge as organisations look to apply new technology more broadly.



"The right question to ask is: How do I get real-time information for better decision-making so I can have a more valued seat at the executive table?"

Chris Kavanaugh
Managing Director,
Tax Transformation,
Forvis Mazars in the U.S.

Preparing for what's next

Turning tax data into forward-looking insight

The challenge

A large Fortune 500 organisation had a data problem resulting in an inability to view existing data. The tax basis information sat across different parts of the business, making it difficult to connect movements across the balance sheet and P&L, or build a reliable picture of the organisation's current tax position.

Our solution

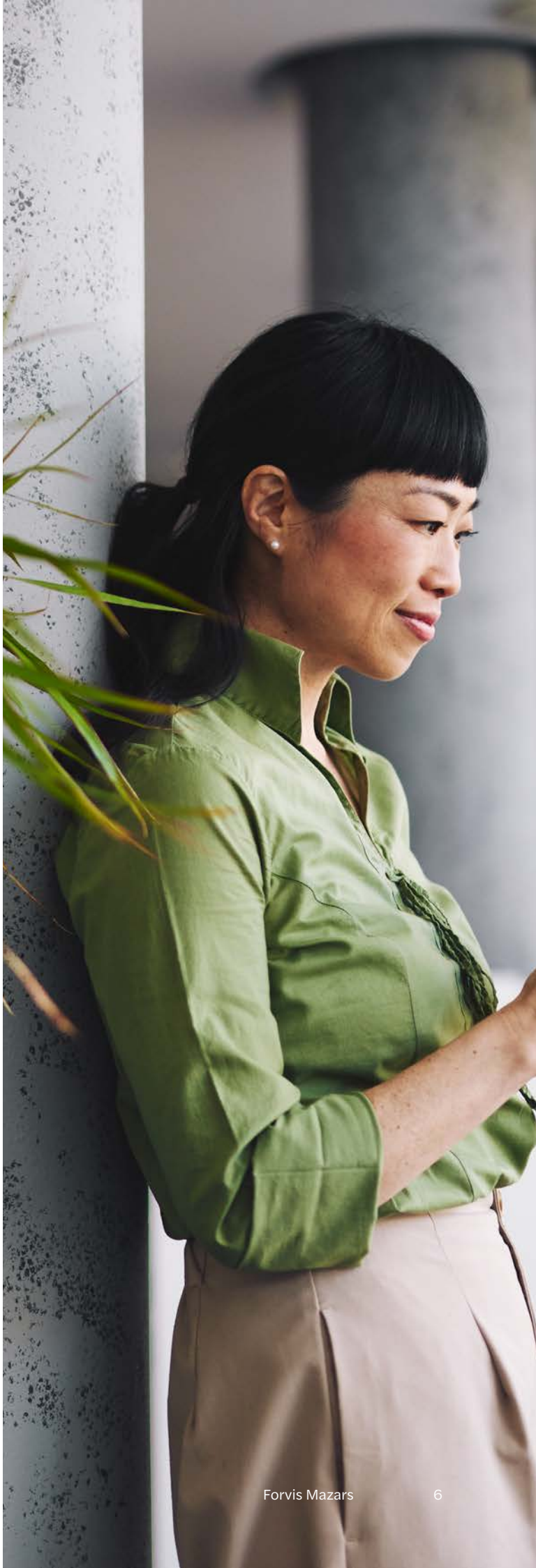
The starting point for Forvis Mazars was to pinpoint how better information would make the greatest difference. In-depth research with the client quickly identified the priority: a real-time tax basis trial balance. This involved bringing together the underlying data so tax positions can be viewed across jurisdictions and business groups with greater visibility over current-year, cumulative and deferred positions.

For tax planners, the VP of Tax and the CFO, the solution delivered practical benefits. Information that was previously assembled periodically could be used much earlier, giving the business a stronger basis for planning, scenario analysis and decision-making.

Impact

A clearer view of the tax position is available as it develops rather than after the event. This gives the client greater scope to identify issues sooner, test the consequences of business decisions earlier and bring tax into the conversation while choices are still being made.

The outcome is a tax function better equipped to anticipate change, support the business and make its insight count when decisions are being taken.



Transformation

Building an AI strategy for lasting tax transformation

Moving beyond generative AI to build connected tax solutions

With AI making it possible to connect information in new ways, the opportunity now exists to move past isolated processes towards a more integrated view of the tax function. While the ability for generative AI to suggest text, summarise documents, analyse data, and help automate and enhance tax compliance is already available, greater ambitions need to be considered. It means treating data as a strategic asset rather than an administrative by-product. Specifically, organisations need to understand where tax-relevant information originates, how it moves through their systems, who owns it and whether it can be trusted and reused.

Another important consideration is to ensure data solutions are not designed too narrowly. Taking a broader view at the outset can help organisations identify common data requirements. This ensures that a dataset developed for one tax process may also support others, including tax provision, transfer pricing and indirect tax compliance. This not only avoids duplication but makes subsequent transformation initiatives easier to deliver.

> "If you design tax data around one immediate requirement, you may find yourself rebuilding the same solution when the next one comes along. Taking a broader view from the outset can avoid costly duplication and create a foundation that supports the tax function as its needs evolve."



Jenna Stutz
Managing Director,
Tax Transformation,
Forvis Mazars in the U.S.

The objective is not simply to collect more data. It is to create a reliable, connected and governed data foundation that allows tax professionals to spend less time preparing information and more time analysing it, managing risk and supporting decisions.

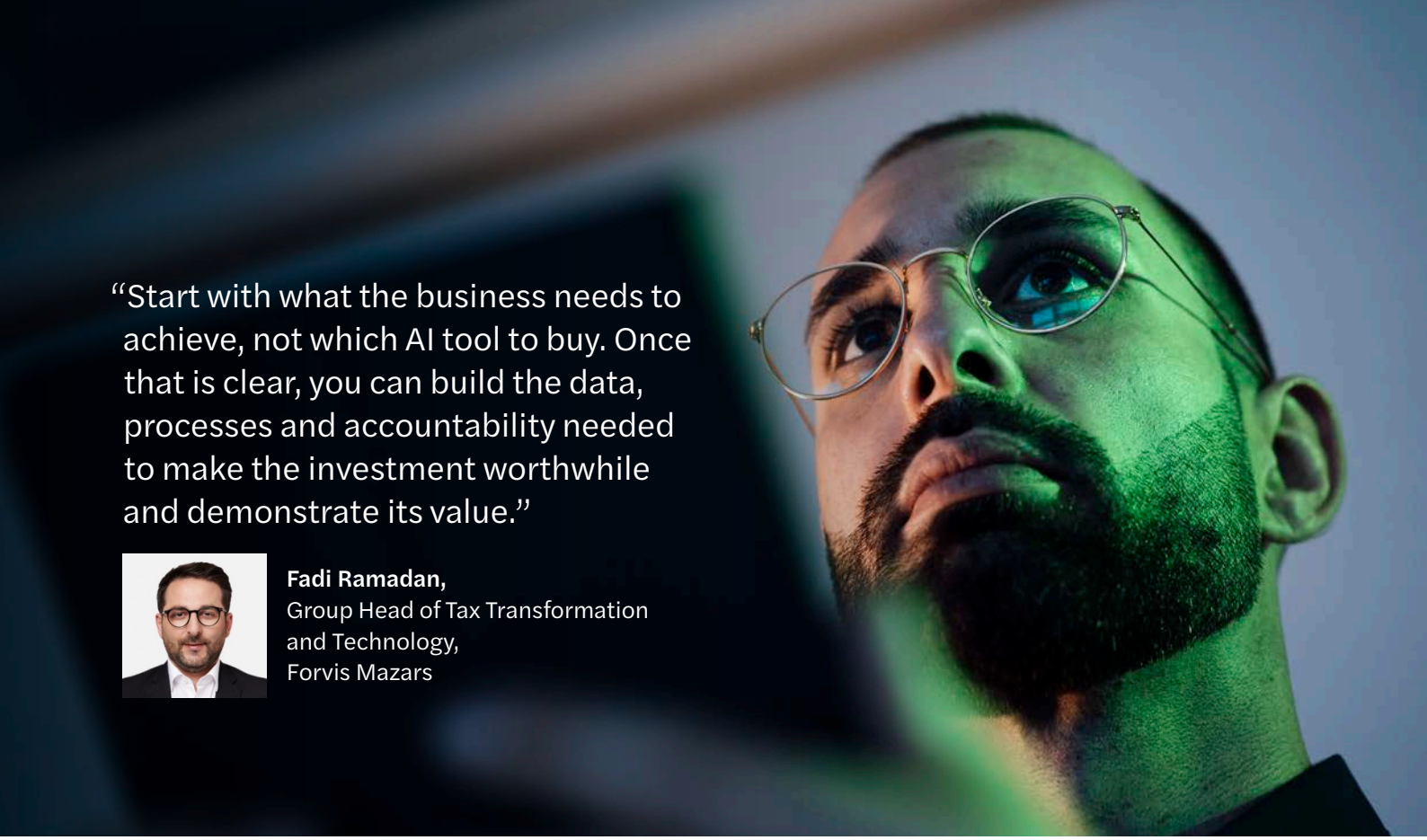
Putting business value at the centre of tax transformation

Efficiency has long been an important driver of tax transformation. Automation can reduce repetitive work, improve consistency and release capacity in teams under pressure. However, organisations that gain the most from transformation begin with a broader question: what value do they want to create?

Using new technology for the sake of it is no longer a strategy. Successful teams define an outcome, establish how tax can contribute to the business and then identify the technology, data and operating model needed to deliver it. That outcome might involve reducing tax risk, identifying savings opportunities, improving the management of legal entities or providing decision-makers with more timely information.

Key to this approach is what that information enables. Rather than waiting for a reporting cycle, decision-makers can examine tax positions across jurisdictions or business units and use those insights in planning. This broader ambition moves from retrospective to proactive reporting that helps understand the implications of decisions before they are made.

It's a shift that changes the contribution tax makes to the business. With better information, tax teams can help assess the consequences of acquisitions, evaluate scenarios and identify potential costs or benefits earlier. Equally, the importance of measuring AI outcomes accurately is vital. Relevant indicators might include reduced manual effort, shorter tax close cycles, greater automation, fewer compliance errors and less time spent preparing data.



"Start with what the business needs to achieve, not which AI tool to buy. Once that is clear, you can build the data, processes and accountability needed to make the investment worthwhile and demonstrate its value."

Fadi Ramadan,
Group Head of Tax Transformation and Technology,
Forvis Mazars

The overall lesson is that technology should follow value, not the other way around. Tax leaders need to articulate the business problem, define the desired outcome and establish how success will be measured before choosing a solution.

How CFOs and Heads of Tax can drive transformation together

Tax transformation rarely succeeds within the tax department alone. Much of the information it relies on originates in wider finance and accounting processes, while the changes required often extend across several business functions. Improving the final stage of tax reporting without addressing problems further upstream can limit the benefits.

Heads of Tax have a central role in identifying where transformation can make the greatest difference, from improving data quality and managing risk to providing better insight for business decisions. Yet delivering these improvements may require investment, resources and changes that extend beyond their direct control.

This is where CFO sponsorship becomes particularly valuable. By aligning priorities across finance, resolving competing demands and securing investment, CFOs can help overcome the organisational barriers that might otherwise slow progress.

Successful transformation depends on both roles working closely together. Heads of Tax should help shape the strategy, establish priorities and lead the changes needed within the function. CFOs can provide the broader support and accountability needed to embed those changes across the business.

Together, they can ensure that tax transformation delivers lasting improvements, with clear ownership of the work and a shared understanding of the value it should create.

Spotlight
Can your systems and data meet e-invoicing requirements?



Eline Polak
Group Head of Indirect Tax,
Forvis Mazars

"If you cannot provide the data that belongs to your products, you will not be able to get those products into the jurisdiction where you want to trade. Businesses need to ensure they understand the information required in each market, who is responsible for it and whether it can be produced before goods reach the border."

The European Legislation on e-invoicing requires public entities across the EU to receive and process structured electronic invoices. The primary objective is to reduce VAT fraud and provide tax authorities with accurate sales and purchase data. However, as EU countries are implementing reforms using different regulations and technical models, the lack of harmonisation creates challenges for companies using shared providers across multiple EU countries.

In particular, companies need to adopt robust internal controls to check that data sent through authorised platforms accurately reflects their business, together with regular reconciliation of electronic sales and purchase invoice data with accounting records and VAT returns. The key risk is gaps between accounting entries, reported VAT figures and invoice evidence. For example, some clients have been unable to download or retrieve supporting invoices from their ERP system, without which companies may be unable to substantiate VAT credits or defend their VAT position to tax authorities.

The operational impact is that organisations face significant implementation costs, ERP integration difficulties and new requirements to reconcile accounting data, VAT returns, invoices and supporting documents. At the same time, accounting teams are expected to reduce routine work through automation while taking on additional controls. All of which creates uncertainty about workload management.

Data quality is a further issue. As e-invoicing reporting requirements increasingly involve structured digital information, businesses need to ensure that tax-relevant data is captured correctly and moves reliably through their systems.

It requires coordination across finance and IT, with processes designed to ensure that invoices are accurate and usable by customers and other stakeholders. The commercial consequences matter. An invoice that cannot be processed correctly can create payment problems, turning a technical or data issue into a cash-flow concern.

The risks also extend to international trade where such information is needed to support products as they move across borders, including relevant customs and due diligence information. Where businesses cannot provide the required data, shipments may face delays or be unable to enter their intended markets. Information quality therefore has implications beyond the tax department, affecting logistics, distribution and wider commercial operations.

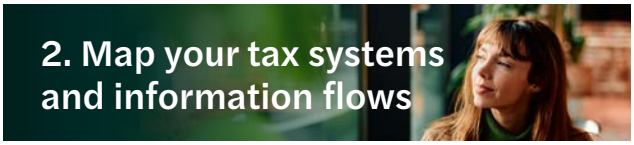
The tax transformation agenda
Five priorities for the next 12 months



1. Start with a clear vision

Before selecting tools or launching projects, define what the tax function needs to achieve. Is the priority to reduce risk, improve decision-making, strengthen reporting, release capacity or create greater visibility of tax positions?

Stakeholders need to understand the direction of travel. A shared vision helps prevent individual projects from becoming disconnected from the wider business strategy.



2. Map your tax systems and information flows

Tax leaders should understand where information sits, how it flows across the organisation and whether it can support the processes they want to transform. Fragmented enterprise resource planning (ERP) environments, inconsistent data and unclear ownership can all limit the value of technology introduced.

Start with a transparent and clear understanding of the data landscape before moving into execution.



3. Prioritise the highest-value opportunities

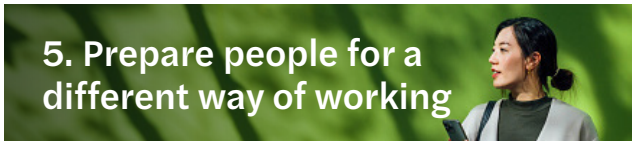
Not every process deserves equal investment. Focus on the activities with the greatest impact on taxable income, tax risk or the bottom line. That may mean addressing a significant data challenge or an opportunity to improve tax planning rather than automating a routine process simply because the technology is available. Select a starting point that can demonstrate tangible value and create momentum for subsequent initiatives.



4. Bring tax, finance and IT together

Transformation depends on collaboration. Finance, IT, data specialists and operational teams all have a role in delivering solutions that work across the business.

CFO sponsorship can help establish accountability, align priorities and secure the investment required. Tax leaders, meanwhile, need to develop the partnerships and capabilities that allow them to work effectively with other functions.

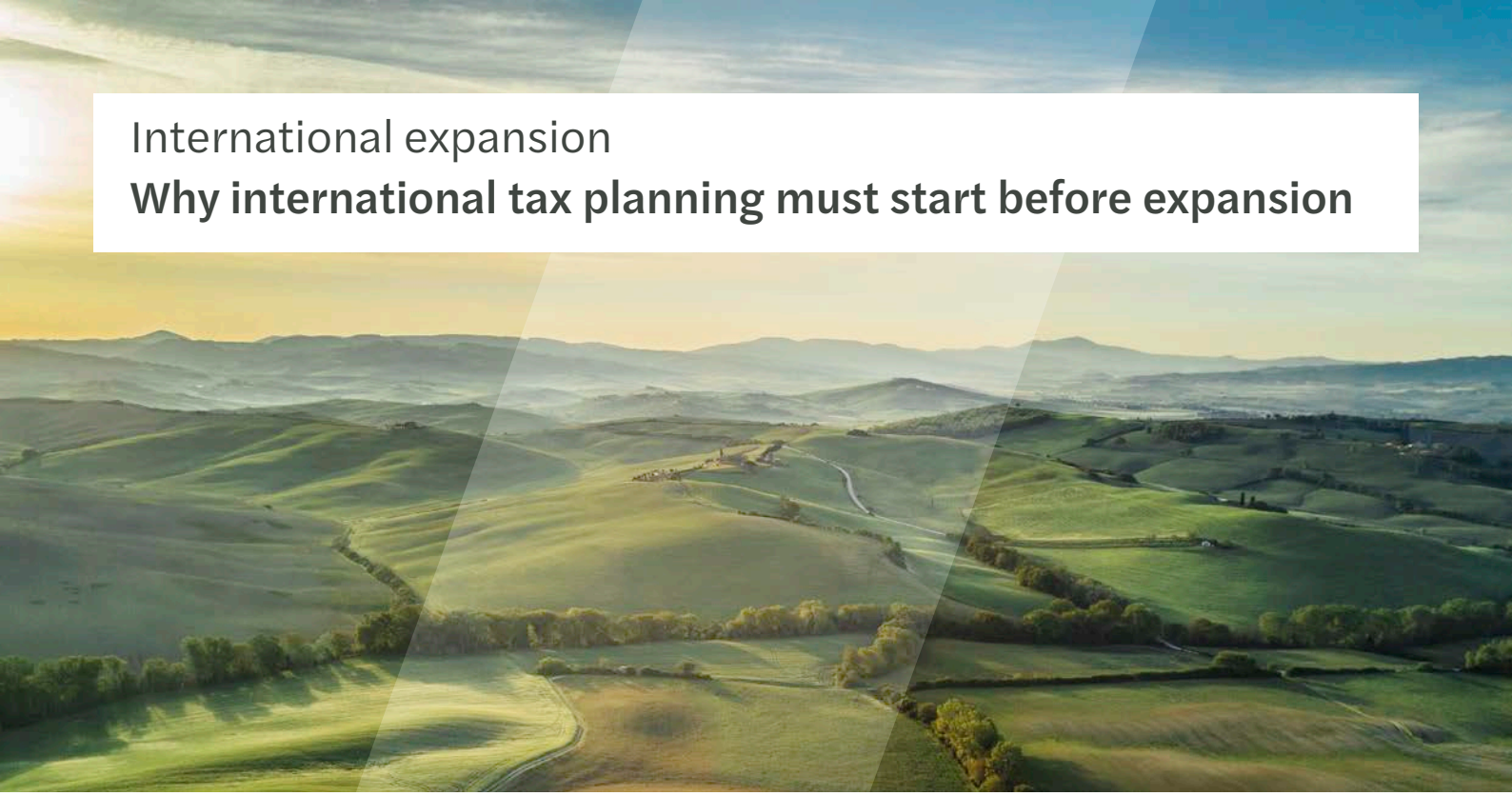


5. Prepare people for a different way of working

Technology alone will not deliver transformation. Moving from experimentation to implementation requires changes in responsibilities, processes and trust. Tax teams may need access to expertise in data engineering, data architecture, governance and AI, alongside their existing technical knowledge.

Leaders should plan for adoption as carefully as they plan for implementation. Taken together, these priorities offer a practical sequence: define the outcome, understand the data, choose the right opportunity, mobilise the organisation and embed the change.

Explore our latest global transformation insights



International expansion

Why international tax planning must start before expansion

International expansion offers major advantages for organisations seeking untapped overseas demand and revenue diversification. Yet while access to new markets opens up opportunities, mounting regulatory and geopolitical pressures require a more hands-on approach from heads of tax.

Earlier involvement in expansion planning, greater agility in responding to change and improved control over data transparency issues are increasingly vital.

For companies looking to expand abroad, growth is no longer just about spotting demand in a new market. Regulation is changing faster than many expansion plans can keep up, and global economic and political shifts are reshaping location and supply-chain decisions. In addition, while businesses may have plenty of information, they may not have the clean, connected data needed to act with confidence.

By moving tax from the end of the process to the beginning, early scenario planning can test the effects of expansion plans on entity structure, supply chains, tax technology and data governance before choices become difficult or costly to change.

Tax decisions that shape international expansion

Early involvement is not a search for a one-size-fits-all template. Each country has its own rules, but companies can take steps to build a repeatable global playbook: a consistent set of questions and processes to adapt market by market. It should cover legal-entity design, transfer pricing, indirect taxes and compliance, as well as how profits can be used or repatriated. Thinking through cash movement before entering a market can help avoid surprises from profits trapped in a jurisdiction or the need to retrofit a structure later.

International expansion

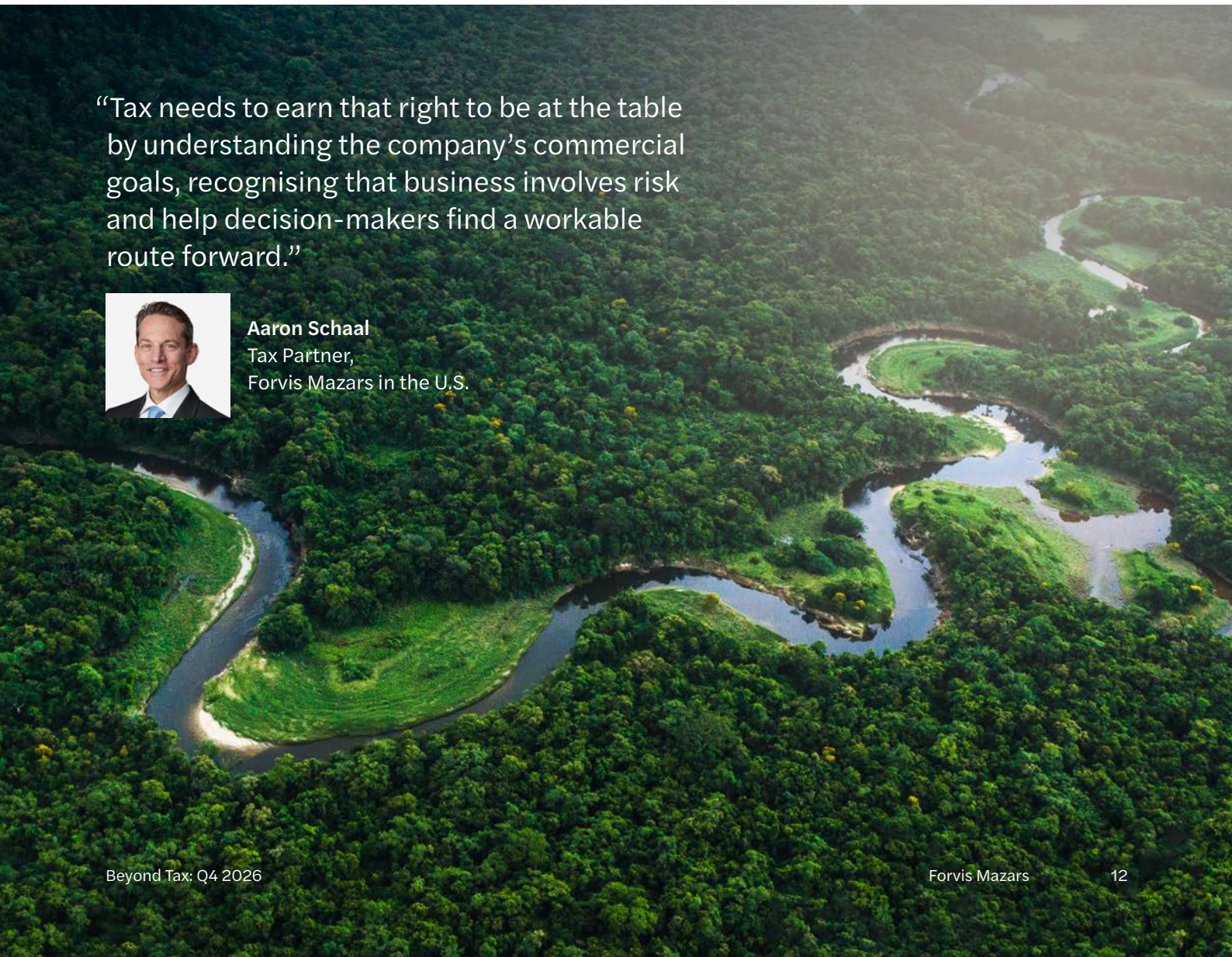
Why international tax planning must start before expansion

A key first step is to connect finance and the tax analysis to the decisions the company is actually making. ***Where will it earn its profits? How will cash move? What role will each country play in the supply chain?*** Those questions can affect tax and legal structure choices and whether a market should operate as a cost centre or a profit-generating entity.

Importantly, risk should be assessed and not simply treated as a reason to stop. Tax teams can explain the likelihood and potential cost of an exposure, identify ways to reduce risk and help leadership weigh it up against the expected business benefit. Companies need to take calculated risks to make money; tax should help them grasp those challenges.

While leaving tax out of the planning stage can have practical, costly consequences, tax teams should not expect a seat at the table automatically; they need to educate on the value of collaboration by understanding broader business implications and working more closely with teams outside tax.

Redesigning expansion plans is difficult once structures are in place. Involving tax early and framing advice in commercial terms can help companies make better-informed expansion choices before those decisions become expensive to unwind.



"Tax needs to earn that right to be at the table by understanding the company's commercial goals, recognising that business involves risk and help decision-makers find a workable route forward."

Aaron Schaal
Tax Partner,
Forvis Mazars in the U.S.

Preparing for what's next

A US company's European expansion: one tax strategy for 12 markets

The challenge

A large US company planned to expand into 12 European countries within a year. The scale and pace of this ambition presented significant tax and regulatory challenges, with each market bringing its own compliance requirements. Heightened scrutiny of transfer pricing, alongside changing tariffs and supply-chain conditions, added further complexity.

The business needed a coordinated approach that would support its growth ambitions while managing tax risks and avoiding unnecessary obstacles to expansion.

Our solution

Forvis Mazars worked with the company from an early stage of its expansion planning to develop a consistent international tax framework. This involved reviewing its legal entity structure, transfer pricing arrangements, compliance processes and plans for managing and repatriating cash.

Rather than approaching each country as a separate project, the team developed a repeatable framework that could be applied across multiple markets while accommodating local regulatory requirements. This gave the business a more structured approach to managing the tax implications of its international growth.

Impact

The company successfully expanded across multiple European jurisdictions, applying a consistent approach to tax planning rather than managing each market in isolation.

By addressing tax considerations early, the business was better positioned to anticipate regulatory challenges, reduce the risk of avoidable surprises and make expansion decisions with greater confidence.

The result was a more coordinated approach to international growth, demonstrating how proactive tax planning can support commercial ambitions while managing the complexities of entering new markets.



International expansion

Why international tax planning must start before expansion

How tariffs and trade barriers reshape expansion decisions

Where a company sources, manufactures and sells its products can no longer be treated as a fixed, long-term decision. Tariffs, political uncertainty and changing costs can quickly reshape a market's economic viability, making international expansion planning more complex than a one-time site-selection exercise. Increasingly, policy and political conditions can shift dramatically with customs duties and trade barriers influencing whether a company enters a market at all.

That uncertainty puts sourcing and manufacturing choices closer to the centre of expansion strategy. For example, companies may need to compare the cost of importing with the cost of local production and consider how the product's origin and supply chain affect its treatment at the border.

Those calculations are not purely technical. Decisions about production locations can involve political and economic factors that tax teams cannot control. But they still need to understand how those factors affect the business case and make sure decision-makers have the relevant analysis.

It requires dynamic modelling rather than relying on assumptions that may quickly become outdated. Finance teams should build models that can be refreshed as tariffs, tax rates and other conditions change, potentially monthly or even weekly. That makes it easier to compare scenarios and see how a new cost or policy could affect expansion plans.

"Dynamic modelling gives the ability to stress-test plans regularly and assess how changes in tariffs, tax rates, energy costs or political conditions could affect the business case."



Michael Cornett
Managing Director, Tax,
Forvis Mazars in the U.S.

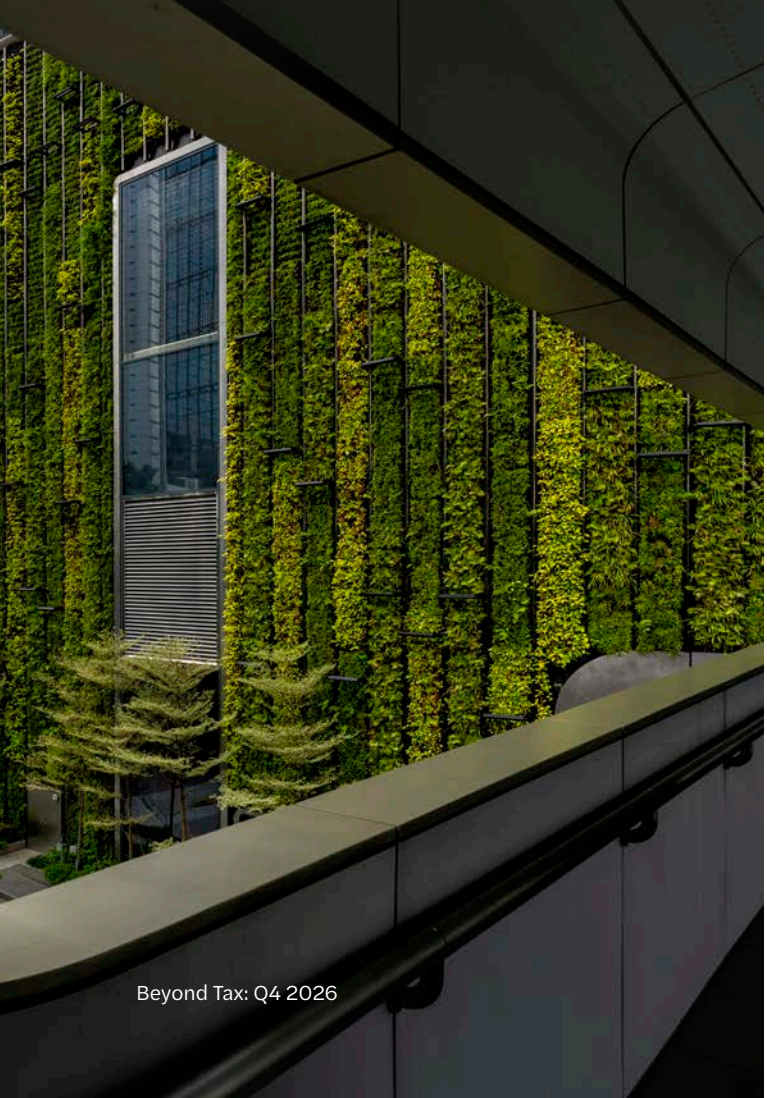
The aim is not to predict every political turn but to create a planning process that can respond when conditions change. Companies that regularly revisit their assumptions may be better placed to adjust sourcing, pricing or investment decisions before new costs undermine the existing strategy.



"Greater transparency means a tax position may be scrutinised in more than one country and long after a decision was taken. Businesses need consistent records and clear explanations of why decisions were made, so they can defend their positions wherever and whenever questions arise."



Andreas Klenk,
Tax Partner,
Forvis Mazars Germany



Preparing for greater scrutiny as tax transparency increases

Companies expanding across borders operate in an environment where information is increasingly visible, comparable and open to challenge. While information can help businesses manage their obligations, it also gives authorities more ways to scrutinise what companies report.

Greater transparency makes inconsistencies easier to spot. When information can be compared across jurisdictions, discrepancies may draw attention. Maintaining consistent positions and records is an ongoing responsibility, not something to revisit only when an audit begins.

We are also seeing customs take a more data-intensive oversight. In Europe at least, this move is toward customs processes that rely more on data and trust, making accurate underlying information essential. This shift makes data quality a business-control issue. Companies need to know where their information comes from, who is responsible for it and whether their internal records support the positions they take across markets. They also need clear processes to review changes and keep information consistent.

The practical takeaway is to establish controls, assign responsibility, preserve records, and check that reporting aligns across countries and over time. In a connected audit environment, reliable and consistent information can help companies respond to scrutiny and avoid disputes.

Spotlight

Who owns cross-border intellectual property and how is value assigned?



When contemplating international expansion, companies need to consider who owns the intellectual property created or used across borders. Increasingly, documenting ownership, contracts and internal relationships is essential.

This is especially important when employees, agents, or AI tools contribute to work, as ownership can affect transfer pricing and how income is allocated among entities.

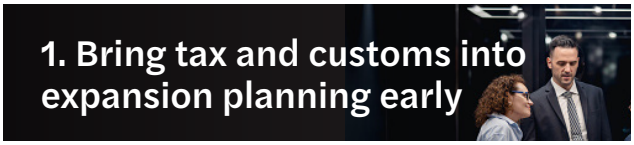
More fundamental questions arise when AI moves beyond administrative support. Cloud-based AI systems can now make supply-chain decisions and alter contracts without human involvement. That prompts questions about where a business is managed and controlled, and how existing concepts such as permanent establishment and VAT obligations apply.

It also opens broader debates about how tax systems should treat modern, digitally delivered global activity. Traditional approaches often focus on people, equipment and physical facilities; AI-led operations may challenge how well those measures capture where value is created or decisions are made.

In addition, businesses should account for export controls alongside customs and tax. While regulations for controlled products and licensing can be unclear, delays in obtaining a licence could disrupt expansion plans.

The priority is to prepare; clarify accountability and ownership, understand how AI is being used, and ensure tax, legal, customs, and business teams are involved in cross-border decisions.

The international expansion agenda
Five priorities for the next 12 months



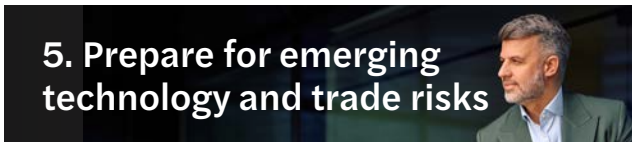
Involve tax and customs strategies before choosing markets, structures or supply-chain routes, and frame advice around business goals and manageable risks.



Use adjustable financial models developed to assess how changes in tariffs, tax rates, energy costs or political conditions could affect the business case for expansion decisions.



Clarify where products will be sourced and made, where profits are expected, how cash will move, and how transfer pricing and customs duties affect the plan.

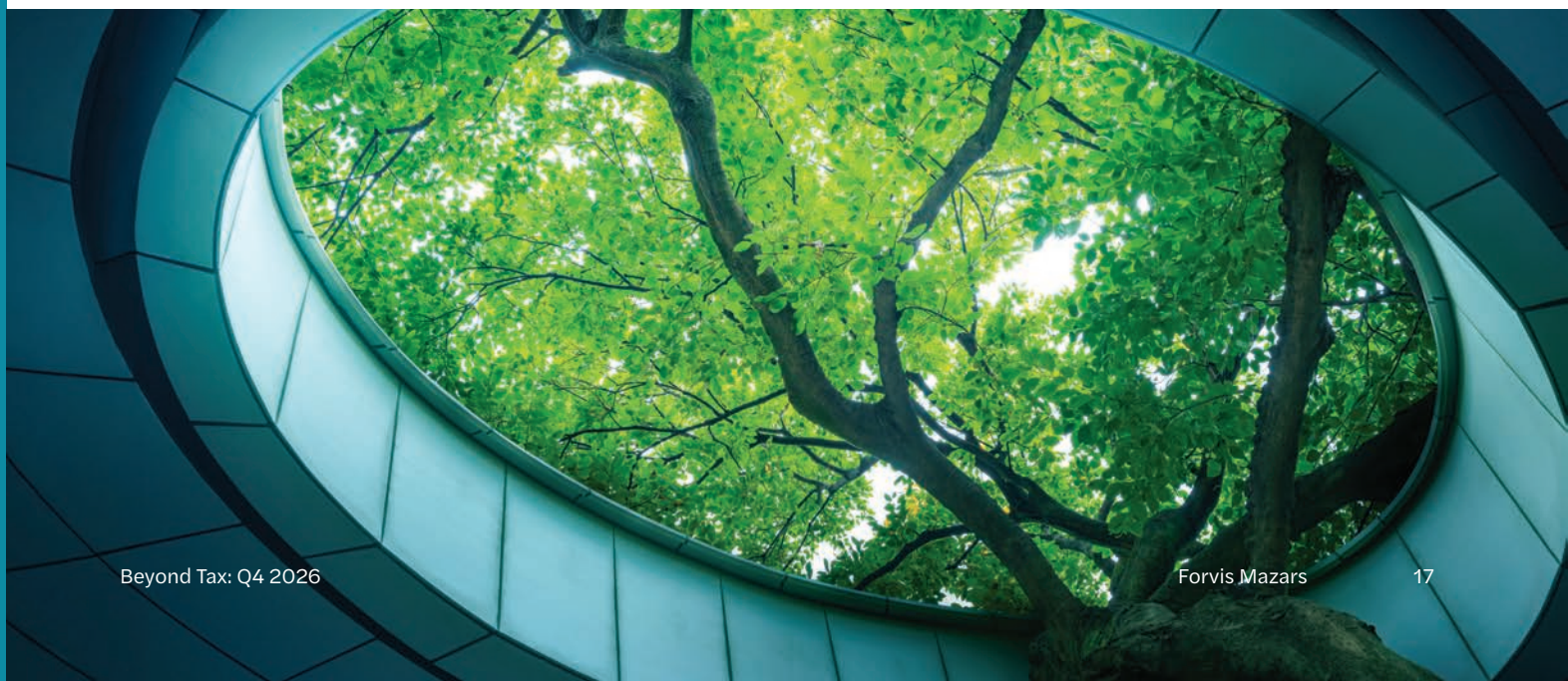


Build practical AI knowledge, record intellectual property ownership, and clarify who's responsible for export controls and licensing.



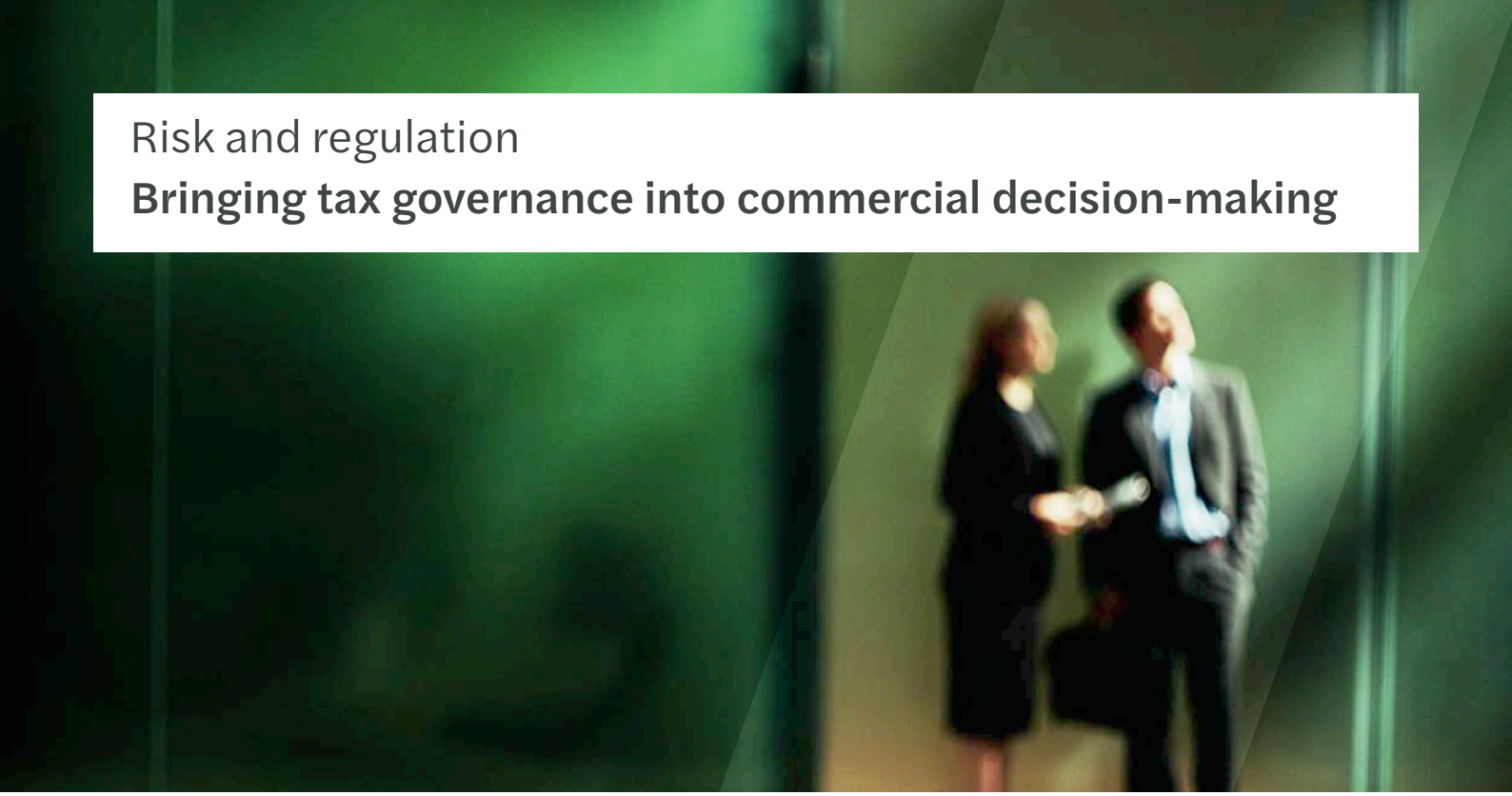
Assign clear ownership of tax and customs data, establish a control framework, and ensure positions and reporting align across jurisdictions and over time.

Explore our latest global international expansion insights



Risk and regulation

Bringing tax governance into commercial decision-making



The tax function is shifting from locating the lowest corporate income tax rate to a value-added role that supports operational value creation, growth and cash-flow preservation. To navigate this change, the tax function must become a strategic business partner by combining technical knowledge with broader business understanding.

The move from back-office, retrospective compliance and reporting unit to a proactive, data-driven strategic adviser is vital. Rather than focusing narrowly on returns and compliance or building complex structures solely to pursue tax savings, tax teams need to understand how the business works: where it operates, how it earns revenue and how money moves between entities. Cash flow is one practical place to start. Companies need visibility into payments such as interest, dividends and royalties, and a clear understanding of how those flows work across the group.

At the same time, tax teams still need to preserve valuable attributes, such as research and development credits, understand interest limitation rules, and assess how structural reorganisation or acquisitions could affect losses and other tax benefits. The challenge is to connect that technical work to the company's wider plans.

"Understanding the tax rules is only half the job. The real value comes from knowing how the business operates, where the risks lie and how tax advice can shape better commercial decisions."



Jérôme Labrousse
Tax Partner,
Forvis Mazars France

Bringing tax governance into commercial decision-making

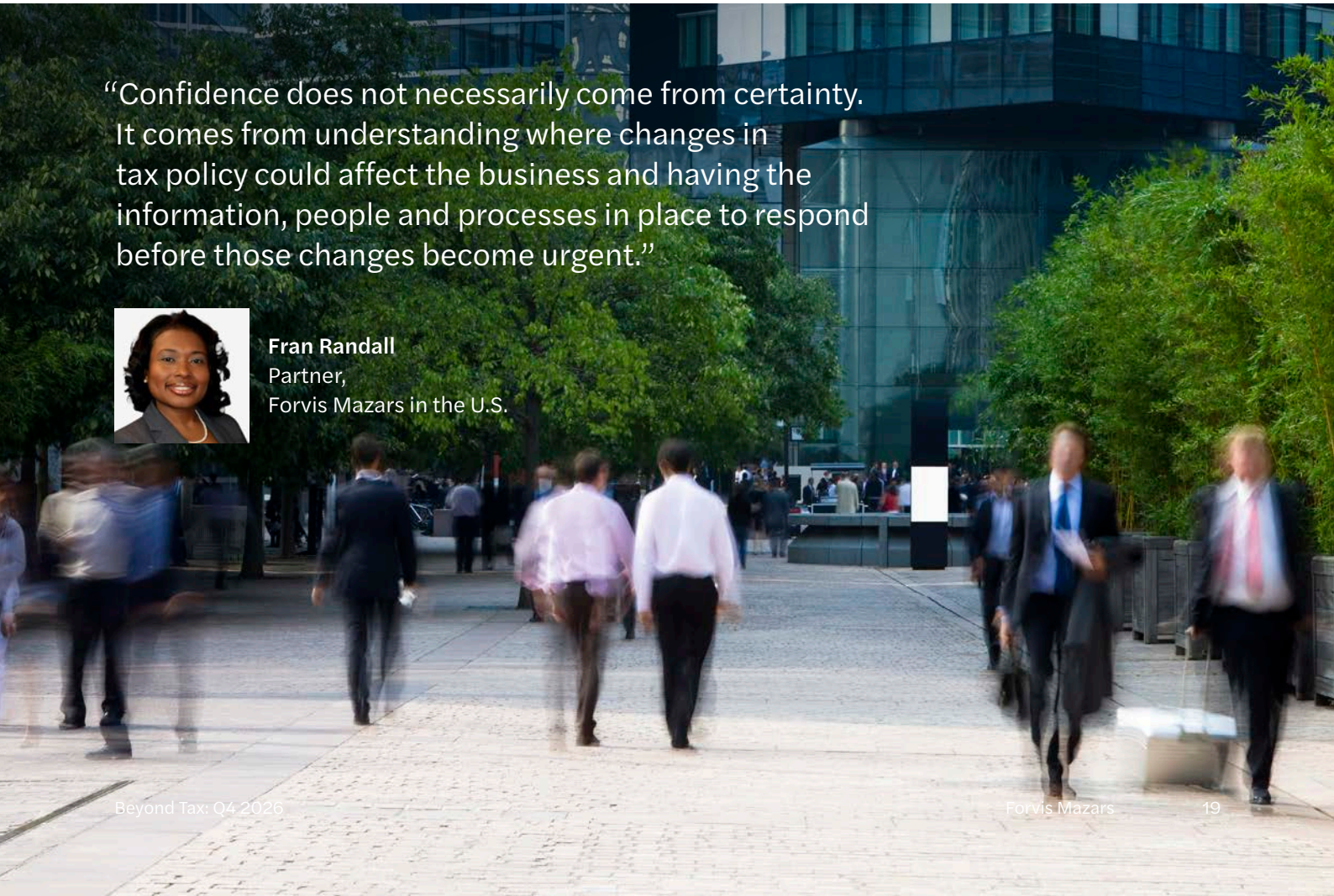
For CFOs, that means involving tax early in decisions about investment, restructuring and growth. It also means ensuring the tax team can explain how its advice affects forecasts, risks and cash flows. The broader aim is for tax to become a partner in business decisions: compliant and transparent, while helping the organisation understand the consequences of its choices.

Managing tax risk amid geopolitical uncertainty

Uncertainty has become one of the defining challenges for tax teams. Rules that once seemed relatively stable can now shift with geoeconomic tensions and changing government priorities. For tax teams making decisions with long-term consequences, that makes it harder to predict what the regulatory landscape will look like even a few years from now.

The changing international tax environment adds another layer of complexity. As countries develop their own approaches to regulations such as Pillar Two, companies may face different versions of minimum-tax requirements, with varying obligations and data needs. A framework intended to address the tax planning of very large multinationals can also reach relatively smaller organisations, bringing new reporting duties and compliance costs.

When policies change frequently, companies cannot rely on yesterday's assumptions to guide tomorrow's decisions. Tax leaders must consider not only what rules apply today, but how quickly they could change and how prepared the organisation would be if they did.





"The time to discover gaps in your tax data is not when the authorities come asking for it. Tax leaders need to know what information is required, where it sits and whether they can rely on it so they can meet regulatory obligations and respond to scrutiny with certainty."

Eric Flueckiger
Partner,
Forvis Mazars in the U.S.

With uncertainty the new norm, organisations need to build the capacity to respond. That starts with understanding which rules apply, what information is required and where it sits within the organisation. From there, tax teams can establish repeatable processes, use automation where it helps and prepare for likely scenarios before they become urgent.

Confidence to deal with risk and regulatory constraints need not depend on a predictable tax system, and increasingly, it comes from an organisation's ability to anticipate change and act on it. In an environment where tax policy may shift quickly, preparedness does not guarantee change will be easy - it helps ensure that when the rules move, the business isn't starting from scratch.

Tax data is becoming a test of organisational readiness

As international tax rules grow more complex, companies face more than just understanding new requirements. It is also about producing the right information, reliably and on time.

Tax and finance departments often have limited resources. New obligations can require teams to gather information from multiple sources, reconcile records and meet reporting requirements that may differ by jurisdiction. Companies need to define the scope of what applies to them before deciding how to manage the work. Only then can they build processes that are efficient enough to repeat.

That work may include automation, but technology is not a substitute for sound governance. In particular, organisations need to know who owns each process, whether the underlying information is reliable and how quickly an issue can be escalated. Technology can create capacity, but it should be treated as a tool and not the final authority on a tax position.

In addition, the risks of public disclosure are rising. Companies need to understand what information is being made public and how it may affect the business. If data appears across different filings or platforms, inconsistencies may draw attention from authorities or create a misleading picture. Strong data governance can help organisations maintain a consistent account and identify gaps before they become problems. Good working relationships with finance, accounting, legal and operations teams help ensure tax has relevant information early enough to identify potential problems.

It means data readiness is partly a technical challenge and partly a relationship challenge. Teams need systems that can collect and organise information. But they also need access to the people who understand how the business operates. A tax leader who is included in planning discussions can help identify consequences before a decision is finalised.

Bringing tax governance into commercial decision-making

Create a more agile tax function

In a fast-changing regulatory environment, the ability to pivot without reorganising the entire tax function each time business conditions or risks shift offers a clear benefit. But what practical steps can CFOs and heads of tax take to embed the agility now required?

Firstly, agility does not mean reacting to every headline. Much depends on the foundations built before a change occurs: reliable data, strong internal relationships and a clear understanding of how the business works. When tax leaders know what operations, finance, sustainability and legal teams are planning, they are better positioned to identify consequences early and help shape the response.

"Tax does not operate in a silo, and the implications of new rules rarely stop at the tax department. Tax leaders need to understand what finance, legal and operations are planning so they can identify risks early and help the business adapt before decisions become difficult to reverse."



Phil Laminack
Partner, US Income Tax Accounting Practice Leader,
Forvis Mazars in the U.S.

Tax leaders also need clarity about who owns key processes, whether the information supporting a tax position is dependable and how quickly a developing issue can be escalated. Those questions matter most when a company must defend a position, implement a new requirement, or respond to a sudden change.

Prepare for regulatory change before it arrives

Technology can help teams create capacity, but it does not remove the need for judgement and oversight. People who can assess what the information means and determine when an issue requires attention are essential.

External relationships are equally important. The pace of change makes it difficult to rely on occasional updates or annual compliance routines. Building more proactive relationships with industry associations, peers and trusted advisers can help keep abreast of changes and promote a forward-thinking approach. Rather than waiting until a new law creates an urgent compliance request, getting insights into how emerging regulations and political developments could affect the business can reveal what information will be required and whether the company already collects it.

This kind of preparation can make an organisation more responsive. If a future rule depends on data that is not currently available, the company can consider collecting it before it becomes essential. If a policy changes, leaders who have already discussed possible impacts may be able to act faster.

It's equally important to understand the reasoning behind rule changes to move from anticipation to adaptation and action. That mindset helps prevent teams from spending too long reacting emotionally to developments they cannot control.

For heads of tax, the priorities are clear: remain curious, maintain regular dialogue with external advisers and peers, and stay closely connected to colleagues inside the organisation. Agility is not a last-minute response but a capability built through ongoing preparation so that when change arrives, the business is ready to move.

Spotlight

Will tax simplification really reduce the compliance burden?



Ivana van der Maas
Director Tax Policy
and Technical Practice,
Forvis Mazars Netherlands

"Legal certainty is key. Tax teams should think beyond filing requirements and consider how they would support their positions if challenged."

European tax policy is evolving, but companies should not assume that proposals such as the European Commission's Tax Omnibus proposal, which aims to "simplify", will immediately reduce their workload. For tax teams, the challenge is to track reforms as they develop while meeting current obligations and preparing for new reporting and scrutiny requirements.

In the meantime, existing rules remain in force. Companies still have to manage tax transparency and administrative cooperation requirements while assessing what proposed changes could mean. Importantly, a change to when information must be provided does not necessarily remove the need to keep evidence supporting a tax position.

That distinction matters. A company may not need to report something at the same stage as before, but it may still need to produce documentation if tax authorities later question a transaction. This raises questions about when a company can consider its position secure and how prepared it is to handle a dispute. Clear records and an understanding of the rationale for transactions can be as important as meeting formal reporting deadlines.

The way tax authorities use information may also change as tax authorities adopt more digital tools, including AI. One developing possibility is that authorities will move away from template-based reporting toward systems that draw information from repositories. This could create uncertainty for taxpayers about what information authorities will access and how it will be analysed.

The practical task is twofold: keep complying with today's rules and assign people to monitor what may change tomorrow. Preserving supporting evidence and preparing for disputes can help organisations navigate reforms without mistaking a promise of simplification for immediate certainty.

Preparing for what's next

Strengthening global tax compliance in construction and engineering

The challenge

An international construction and engineering business serving customers in more than 30 countries needed reliable tax compliance support across multiple jurisdictions. Managing differing regulatory requirements demanded strong international knowledge and experience, responsive advice and a consistent approach to addressing tax challenges.

The business sought a trusted adviser who could help its tax leadership manage these obligations while supporting its wider growth ambitions.

Our solution

Forvis Mazars worked closely with the company's tax director to understand its priorities and provide practical, strategic advice on international tax matters.

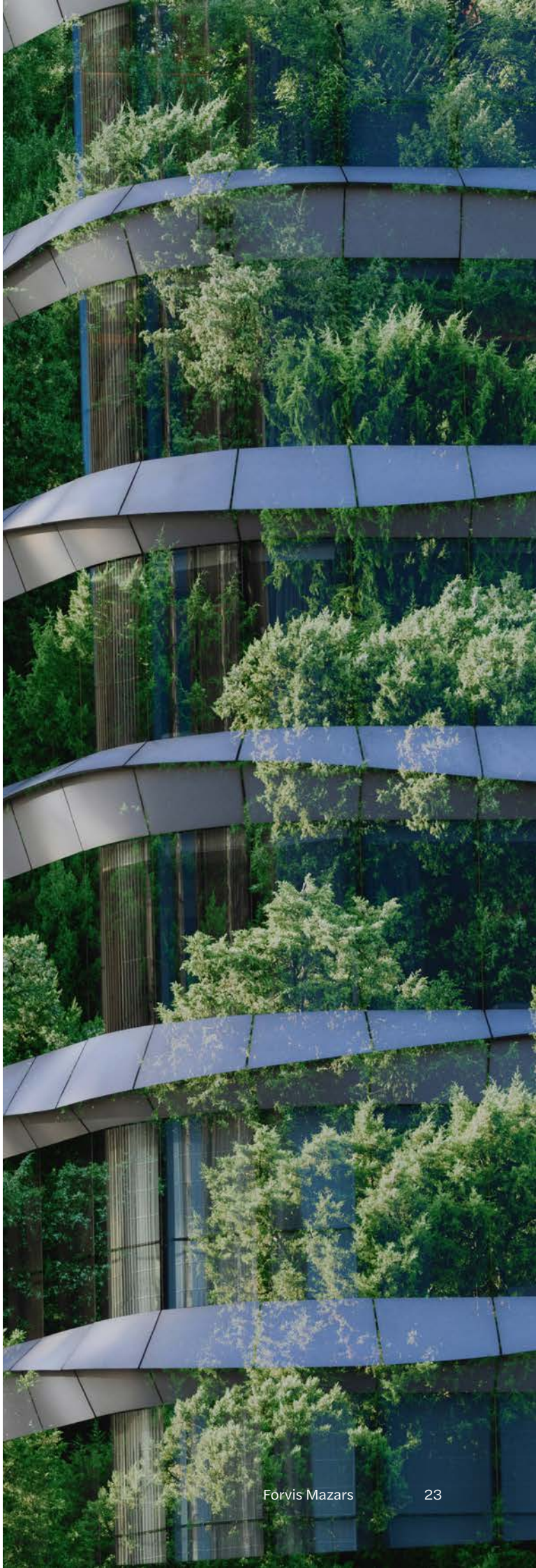
This led to a successful pilot engagement in Latin America, establishing a foundation for broader cooperation. Regular dialogue, responsiveness and access to specialist knowledge helped build a trusted working relationship.

Impact

The initial engagement gave the business greater confidence in addressing international tax compliance challenges and provided a foundation for supporting future growth opportunities.

The relationship has since developed towards broader coordination across regions and service lines, including potential UK tax and advisory support.

By combining international experience with a responsive, collaborative approach, Forvis Mazars helped the business strengthen its ability to navigate regulatory complexity while pursuing its commercial ambitions.



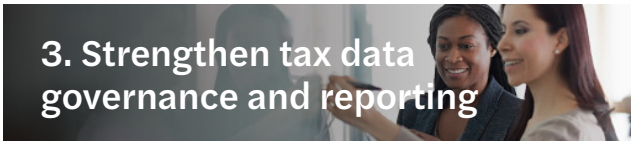
The risk and regulatory agenda
Five priorities for the next 12–24 months



Move the tax function beyond compliance and reporting to become a proactive adviser on business growth, investment, restructuring, risk management and cash-flow preservation. Ensure reporting is accurate, tax risks are understood by management, and the company can explain its positions to stakeholders and, where relevant, the public. Involve tax leaders early in strategic decisions. Deepen the tax team's understanding of operations, forecasts and cash flows so it can support decisions, preserve value and help the business respond to change.



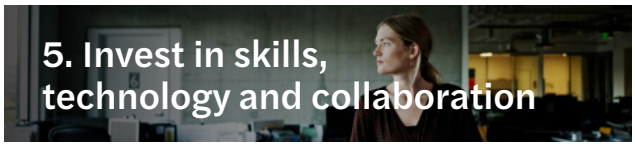
Build the capability to monitor evolving international tax rules, assess geopolitical risks and prepare for potential policy changes. Use scenario planning to strengthen resilience rather than simply reacting to new regulations. Establish an integrated, cross-border view of risk. Connect tax with customs, trade, supply chain and sustainability teams, and develop the capability to assess how geopolitical or regulatory changes affect the organisation across jurisdictions.



Ensure tax information is accurate, accessible, consistent and reliable across jurisdictions. Establish clear data ownership and repeatable reporting processes to meet growing compliance and disclosure requirements. Use automation to improve efficiency, with appropriate oversight.



Develop flexible processes, strong cross-functional relationships and clear decision-making responsibilities. Ensure tax teams can respond quickly to regulatory developments, operational changes and emerging business risks without compromising oversight. Stay ahead of policy and regulatory change. Prepare for change before it happens. Plan for plausible changes, identify information gaps early, and develop the ability to adapt and execute quickly when rules change.



Address skills gaps through continuous professional development, appropriate technology, and stronger relationships with finance, legal, operations, external advisers and industry peers. Combine technical knowledge with commercial judgement and forward-looking insight.

Explore our latest global risk and regulation insights

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