

# Intra-Industry Diffusion of Profit Shifting Strategies

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**Abstract:** Does tax knowledge spill over across firms? Using data on US-listed firms and an event study approach, I provide systematic evidence that profit shifting strategies spread across companies within sectors. An enterprise is more likely to own a subsidiary in a specific tax haven once another enterprise operating in the same sector enters this tax haven. A battery of three-way fixed effects and the non-existence of pre-trends allow a causal interpretation of the results. These findings suggest that firms replicate the tax avoidance schemes of their peers and carry policy implications.

**Keywords:** Multinational enterprises, profit shifting, tax havens, foreign direct investments, spillovers.

**JEL codes:** F14, F23, H26, L25, M21.

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# 1 Introduction

In light of the recent tax scandals, multinational enterprises (MNEs) are frequently accused of large-scale tax avoidance. Some MNEs artificially shift profits from their affiliates implanted in high-tax countries toward those located in low-tax countries to decrease their average effective tax rate. The techniques used to this end are nowadays relatively well-identified and documented in the literature (Beer, de Mooij, and Liu, 2020). However, less is known about the factors prompting MNEs to engage in profit shifting. Tax rate differentials across jurisdictions naturally play a key role. A perhaps more challenging question is whether an MNE affects the income shifting activities of other MNEs. The corporate tax avoidance literature points in this direction. Lim, Shevlin, Wang, and Xu (2018), Barrios and Gallemore (2019), and Gallemore, Gipper, and Maydew (2019) show that firms connected to low-tax firms via auditor, employee, and bank ties have lower effective tax rates. Cen, Maydew, Zhang, and Zuo (2017) demonstrate that the tax planning behavior of companies along the supply chain is determinant. Bauckloh, Hardeck, Wittenstein, and Zwergel (2021) observe that news about tax avoidance practices of an MNE entails a negative stock price reaction among its peers. This response, according to the authors, stems from the fact that investors expect similar firms to employ similar practices.

In this paper, I dig into this question and focus on intra-industry spillovers, profit shifting, and foreign direct investments (FDIs) in tax havens. In the first part of the paper, I build a database on the worldwide network of subsidiaries of US-listed firms between 1993 and 2013. I capitalize on the fact that the Securities and Exchange Commission (SEC) requires these companies to disclose every year a list of their subsidiaries, be it inside or outside the US. On this basis, I construct a database at the firm-country-year level indicating the number of subsidiaries each US-listed enterprise declares in each tax haven. In the second part, I proceed with an event study. I scrutinize the evolution of the probability to report a physical presence in a given tax haven when at least one other company operating in the same 4-digit SIC sector also does. The effect is estimated while controlling for a wide set of confounding factors via three-way fixed effects, thereby mitigating a number of endogeneity concerns.

The benchmark results reveal that the average probability to report a subsidiary in a spe-

cific tax haven increases by 10 percent when a peer is present in this tax haven. The effect is progressive and the average probability increases by 37 percent after 5 years. This finding is corroborated by various sensitivity tests. I show that the estimate is robust across classifications of tax havens. In the baseline equation, I follow the lists of tax havens established by [Hines and Rice \(1994\)](#) and [Dyreng and Lindsey \(2009\)](#), both standard in the literature. Nonetheless, adopting one or the intersection of the two lists delivers the same results. Furthermore, I find consistent results when excluding the largest tax havens. The motive for doing so is that FDIs in large and well-connected tax havens like Ireland and Switzerland might have nothing to do with tax avoidance in the first place. It is on the contrary reasonable to consider that FDIs in small and remote islands like Seychelles are purely attributable to profit shifting. Moreover, the findings are not driven by the estimation methodology (linear probability model versus binary model) and are validated by a falsification test. I randomly assign each 4-digit SIC industry to another 4-digit SIC industry and examine whether profit shifting activities in this random industry affects firms' presence in tax havens. This is not the case. In the same vein, I find no pre-existing trends, which supports the view that the estimates reflect a causal effect.

Lastly, I investigate the existence of heterogeneous effects along two dimensions: over time and across sectors. Profit shifting is growing over time ([Grubert, 2012](#); [Klassen and Laplante, 2012](#)) and more prevalent in finance and services ([Gumpert, Hines, and Schnitzer, 2016](#); [Merz and Overesch, 2016](#)). Hence, I conjecture that spillovers are more pronounced (i) in the 2004-2013 period than in the 1993-2003 period and (ii) in services and financial sectors than in manufacturing. Interestingly, the results confirm the two assumptions.

These findings are new in the literature insofar as they uncover the existence of intra-industry spillovers of profit shifting. In addition, they have policy implications. They emphasize that firms tend to reproduce the tax schemes of their peers. When a firm is found to carry on activities in tax havens exclusively for tax purposes, public authorities could thus pay particular attention to other corporations operating in the same sector. In this regard, the fact that intra-industry spillovers are stronger in services and financial sectors suggests that policy makers should maybe concentrate more efforts on these industries.

The remainder of the paper is organized as follows. First, section [2](#) introduces the data

used to conduct the analysis and presents descriptive statistics. Section 3 then lays out the econometric exercise, the results, and the robustness checks. Finally, section 4 concludes and discusses fruitful avenues for future research.

## 2 Data

The data come from two complementary sources: Compustat and Exhibit 21 filings. Compustat is a database providing extensive information on balance sheets, income statements, and cash flows of all publicly listed firms in North America since 1950. These firms, despite being few in number, concentrate a significant share of overall sales, profits, and employment (Asker, Farre-Mensa, and Ljungqvist, 2014). It is worth noting they are the most likely to engage in FDIs and profit shifting. Earlier work points toward the existence of fixed costs for FDIs (Helpman, Melitz, and Yeaple, 2004). Some of these costs derive from the establishment of facilities overseas, and merely the largest and most productive firms can afford and find profitable to pay these costs. The same logic applies to profit shifting (Bilicka, Devereux, and Guceri, 2020). Avoiding taxes necessitates an excellent knowledge of the tax code. Firms must recruit tax experts to exploit loopholes, mismatches in tax rules, and other legal technicalities to book their income in tax-friendly jurisdictions (US Senate Permanent Subcommittee on Investigations, 2014; Jones, Temouri, and Cobham, 2018). For these reasons, not having a representative sample of the universe of firms is not a problem for this paper.<sup>1</sup>

The Compustat data are merged with data extracted from Exhibit 21 filings. The SEC requires US-listed firms to disclose, each year, a list of their significant subsidiaries in Exhibit 21 of Form 10-K.<sup>2</sup> A subsidiary is qualified as significant if its assets (or revenues) represent at least 10 percent of consolidated assets (or revenues). Moreover, any subsidiary is treated as significant if by combining all undisclosed subsidiaries into one fictive subsidiary, this composite accounts for at least 10 percent of global assets (or revenues). Therefore, Exhibit 21 filings reflect where more than 90 percent of US-listed firms' assets and revenues are recorded. They allow observing where most of the subsidiaries of US-

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1. Small firms are more prone to *evade* taxes. The central distinction between tax evasion and tax avoidance is that tax evasion is undoubtedly illegal. The strategies used are therefore not the same in the two cases.

2. Note that companies are not obliged to uncover financial information concerning each of these subsidiaries.

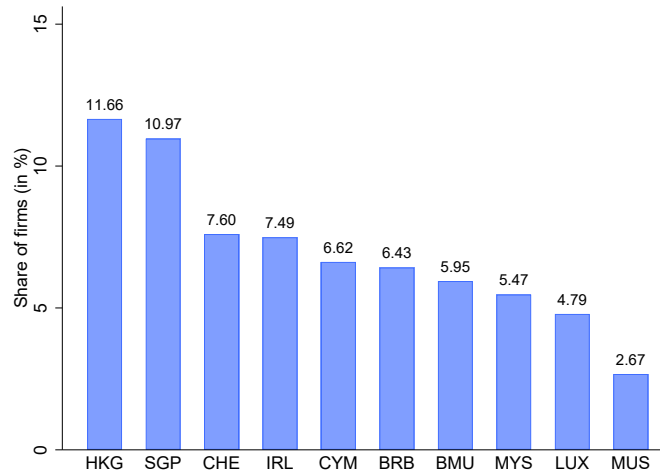
FIGURE 1 – Non-exhaustive list of the significant subsidiaries reported by Johnson & Johnson in Exhibit 21 filings in 2011

<u>Name of Subsidiary</u>	<u>Jurisdiction of Organization</u>
<b>U.S. Subsidiaries:</b>	
Acclarent, Inc.	Delaware
ALZA Corporation	Delaware
Alza Development Corporation	California
Alza Land Management, Inc.	Delaware
Animas Corporation	Delaware
Biosense Webster, Inc.	California
Centocor Biologics, LLC	Pennsylvania
Centocor Research & Development, Inc.	Pennsylvania
CNA Development LLC	Delaware
Codman & Shurtleff, Inc.	New Jersey
Cordis Corporation	Florida
Cordis International Corporation	Delaware
Cordis LLC	Delaware
Cougar Biotechnology, Inc.	Delaware
Crescendo Pharmaceuticals Corporation	Delaware
Crucell Holdings Inc.	Delaware
DePuy, Inc.	Delaware
DePuy Mitek, Inc.	Massachusetts
DePuy Orthopaedics, Inc.	Indiana
<b>International Subsidiaries:</b>	
Apsis	France
Beijing Dabao Cosmetics Co., Ltd.	China
Berna Biotech Korea Corporation	Korea
Berna Rhein B.V.	Netherlands
Biosense Webster (Israel) Ltd.	Israel
Cilag Advanced Technologies GmbH	Switzerland
Cilag AG	Switzerland

listed firms are incorporated and how these networks evolve over time. An interesting feature of Exhibit 21 filings is that they are electronically filed since 1993 and publicly available on the Electronic Data Gathering, Analysis, and Retrieval (EDGAR) platform. I give an example in figure 1, which displays (a part of) the list of subsidiaries reported by the firm Johnson & Johnson in 2011. One potential caveat is that firms might have incentives to under-estimate the number of subsidiaries in tax havens. [Dyreng, Hoopes, Langetieg, and Wilde \(2020\)](#) argue, however, that most disclosures are accurate, even when it comes to tax havens. In this study, I exploit an updated version of the database constructed by [Dyreng and Lindsey \(2009\)](#) covering the 1993-2013 period.

The final sample consists of 14,070 firms, all of which reported one or several subsidiaries at some point, inside or outside the US. The database is compiled at the firm-tax haven-year level. The list of tax havens follows [Hines and Rice \(1994\)](#) and [Dyreng and Lindsey \(2009\)](#), both standard in the corporate tax avoidance literature. A country is assumed to be a tax haven if it figures in at least one of the two lists. In total, 52 foreign countries

FIGURE 2 – Presence of US-listed firms in tax havens



are viewed as tax havens.<sup>3</sup> Among the 14,070 companies, 10,220 of them (73 percent) never declared a subsidiary in a tax haven while 2,753 of them (19 percent) entered a tax haven between 1993 and 2013. The 1,097 remaining firms (8 percent) always reported at least one subsidiary in a tax haven. It means that beyond data availability, 1993-2013 is convenient for the analysis since a significant part of firms started operating in tax havens during this period. According to figure 2, Hong Kong is the most popular tax haven among US-listed firms. 11.66 percent of the firms disclosed at least one subsidiary in this jurisdiction. Singapore (10.97 percent), Switzerland (7.60 percent), Ireland (7.49 percent), and the Cayman Islands (6.62 percent) complete the top 5.

### 3 Econometric analysis

**Identification strategy** Armed with this database, I run the following linear probability model (LPM) with ordinary least squares to see whether tax dodging schemes propagate

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3. The list is composed of Andorra, Anguilla, Antigua, Aruba, Bahamas, Bahrain, Barbados, Barbuda, Belize, Bermuda, British Virgin Islands, Cayman Islands, Cook Islands, Costa Rica, Cyprus, Dominica, Gibraltar, Grenada, Guernsey, Hong Kong, Ireland, Isle of Man, Jersey, Jordan, Lebanon, Liberia, Liechtenstein, Luxembourg, Macau, Malaysia, Maldives, Malta, Marshall Islands, Mauritius, Monaco, Montserrat, Nauru, Netherlands Antilles, Niue, Panama, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Saint Martin, Samoa, San Marino, Seychelles, Singapore, Switzerland, Turks and Caicos Islands, and Vanuatu. Although Channel Islands and UK Caribbean Islands appear in [Hines and Rice \(1994\)](#), they are left aside in this paper due to data limitations.

TABLE 1 – Baseline results

Dependent variable	$FDI_{i,c,t}$
$TREAT_{i,c,t}$	1.32e-3 <sup>a</sup> (2.75e-4)
Firm-year FEs	Yes
Country-year FEs	Yes
Firm-country FEs	Yes
R <sup>2</sup>	0.69
Nb. of obs.	5,514,400

Notes. This table reports the baseline regression results of equation (1). The standard error, in parentheses, is clustered at the firm-year level. <sup>a</sup> $p < 0.01$ . See section 3 for more details.

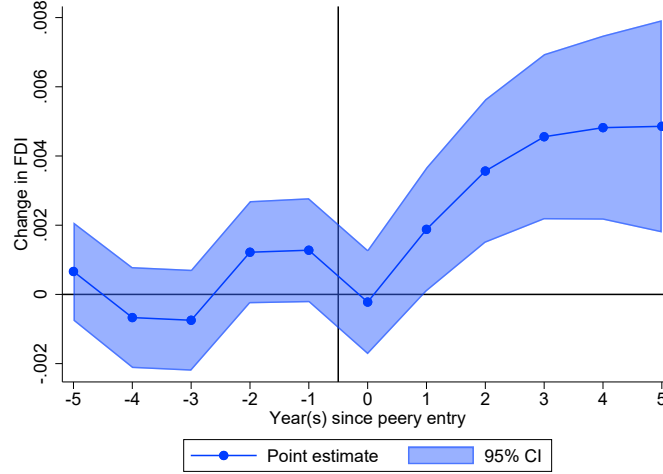
within sectors:

$$FDI_{i,c,t} = \alpha TREAT_{i,c,t} + \mu_{i,t} + \nu_{c,t} + \gamma_{i,c} + \epsilon_{i,c,t} \quad (1)$$

The dependent variable  $FDI_{i,c,t}$  is a dummy variable equal to 1 if firm  $i$  has at least one subsidiary in tax haven  $c$  in year  $t$ . On the right-hand side,  $TREAT_{i,c,t}$  is a dichotomous variable equal to 1 if another firm operating in the same 4-digit SIC sector discloses in year  $t$  a subsidiary in tax haven  $c$ . To mitigate endogeneity, I introduce a battery of three-way fixed effects: firm-year fixed effects  $\mu_{i,t}$ , country-year fixed effects  $\nu_{c,t}$ , and firm-country fixed effects  $\gamma_{i,c}$ . The first set of fixed effects absorb sector- and firm-year determinants of FDIs and tax avoidance. They incorporate, among other things, determinants already highlighted in the literature such as productivity and intangible assets. The country-year fixed effects capture country-year factors influencing foreign countries' inward FDIs from US-listed firms. These factors include (but are not limited to) geographical and cultural distance with respect to the US as well as corporate tax rates. The third and last set of fixed effects, firm-country specific, finally ensures to capture firm-country time-invariant causes of FDIs like firm-country specific knowledge.

**Main results** The benchmark result is outlined in table 1. The coefficient of interest  $\hat{\alpha}$  is positive and statistically significant at the 1 percent level. Given that the average predicted value of  $FDI_{i,c,t}$  is equal to 1.33 percent, the regression result indicates that the average probability to own a subsidiary in a given tax haven increases by 10 percent when another firm in the same sector also does.

FIGURE 3 – Dynamics



Notes. This figure outlines how  $FDI_{i,c,t}$  varies before and after the treatment. Standard errors are clustered at the firm-year level. See section 3 for more details.

**Robustness** I now evaluate the robustness of this finding. In table 2 panel A, I demonstrate that it is not ascribable to the estimation technique. There is no consensus in the econometrics literature on the estimator one should use when the dependent variable is binary (Horrace and Oaxaca, 2006; Angrist and Pischke, 2009; Battey, Cox, and Jackson, 2019; Gomila, 2020). LPMs and binary models have their own advantages and drawbacks. For instance, LPMs are easier to interpret and more transparent, but they might deliver inconsistent estimates under some conditions. On the other hand, binary models guarantee that the predicted probabilities lie on the unit interval, but they may suffer from the incidental parameters problem. An important point, indeed, is that estimating binary models with high dimensional fixed effects is not trivial. Groups for which the dependent variable does not vary should be excluded. This omission leads to the so-called incidental parameters problem, and the estimates, biased, need to be corrected accordingly. I estimate a logit model building on Hinz, Stammann, and Wanner (2020). They design a correction procedure for binary models with three-way fixed effects akin to mine. Reassuringly,  $\hat{\alpha}$  remains positive and statistically significant.

Next, I enrich equation (1) with lagged and leading values of  $TREAT_{i,c,t}$ , denoted  $TREAT_{i,c,t}^{t-k}$  and  $TREAT_{i,c,t}^{t+k}$  respectively, to investigate the existence of pre-existing trends and see how the effect evolves post entry. I observe how the probability of a firm to disclose a subsi-



TABLE 2 – Sensitivity analysis

Dependent variable	$FDI_{i,c,t}$
Panel A: Logit	
$TREAT_{i,c,t}$	0.13 <sup>b</sup>
Panel B: Alternative treatment variables	
$TREAT_{i,c,t}^C$	1.95e-3 <sup>a</sup>
$SHARE_{i,c,t}$	0.11 <sup>a</sup>
Panel C: Alternative classification of tax havens	
$TREAT_{i,c,t}^{HR}$	8.85e-4 <sup>a</sup>
$TREAT_{i,c,t}^{DL}$	1.29e-3 <sup>a</sup>
$TREAT_{i,c,t}^{DL \cap HR}$	8.44e-4 <sup>a</sup>
$TREAT_{i,c,t}^{EX6}$	1.50e-3 <sup>a</sup>
Panel D: Falsification test	
$TREAT_{i,c,t}^{random}$	5.23e-4
Firm-year FEs	Yes
Country-year FEs	Yes
Firm-country FEs	Yes

Notes. This table assess the robustness of the results outlined in table 1. Standard errors are clustered at the firm-year level and not reported for space. <sup>b</sup> $p < 0.05$ , <sup>a</sup> $p < 0.01$ . See section 3 for more details.

diary in tax haven  $c$  fluctuates before and after at least one other firm reports a subsidiary in this specific tax haven. I select a 10-year window around the treatment and estimate equation (2) below:

$$FDI_{i,c,t} = \alpha TREAT_{i,c,t} + \sum_{k=1}^5 \beta_k TREAT_{i,c,t}^{t+k} + \sum_{k=1}^5 \zeta_k TREAT_{i,c,t}^{t-k} + \mu_{i,t} + \nu_{c,t} + \gamma_{i,c} + \epsilon_{i,c,t} \quad (2)$$

The results can be visualized in figure 3. Two comments are in order. First, the effect is progressive and equal to +37 percent after 5 years. Second, there is little evidence of pre-existing trends. The probability to report a subsidiary in a given tax haven does not significantly vary before the treatment, thereby corroborating the common trend assumption. Note that the non-existence of pre-trends (i) implies that the treatment variable is unlikely to be correlated with past unobserved firm-country-year shocks and (ii) alleviates reverse causality concerns.

Panels B, C, and D of table 2 further gauge the robustness of the results. In panel B, I replace  $TREAT_{i,c,t}$  by  $TREAT_{i,c,t}^C$ , counting the number of firms in the same sector reporting at least one subsidiary in tax haven  $c$  and year  $t$ , or by  $SHARE_{i,c,t}$ , measuring the share of firms in the same sector reporting at least one subsidiary in tax haven  $c$  and year  $t$ . Both regressions yield a positive and coefficient, in line with the benchmark estimate. In panel C, I modify this time the set of tax havens. Instead of combining the classifications of [Hines and Rice \(1994\)](#) and [Dyreng and Lindsey \(2009\)](#), I rerun the regression by using them separately ( $TREAT_{i,c,t}^{HR}$  and  $TREAT_{i,c,t}^{DL}$ ) or by forming a more restricted list composed of the countries found in the two lists ( $TREAT_{i,c,t}^{DL \cap HR}$ ). Several classifications coexist because having a low statutory corporate income tax rate is not a sufficient condition to be seen as a tax haven. Other criteria are determinant (e.g., secrecy and self-promotion as an offshore financial center), and the weights associated with those sometimes differ.<sup>4</sup> In the same spirit, a fourth regression puts six tax havens aside: Hong-Kong, Ireland, Luxembourg, Malaysia, Singapore, and Switzerland ( $TREAT_{i,c,t}^{EX6}$ ). Because these countries are relatively large and well-connected with the rest of the world, FDIs of US-listed firms in these countries could be unrelated to tax avoidance. FDIs in remote and small jurisdictions like Jersey and Nauru, for their part, more certainly fall within the scope of profit shifting. In all four cases, the results coincide with baseline ones. Lastly, in panel D, I randomly assign each 4-digit SIC industry to another 4-digit SIC industry as a placebo test. The rationale is as follows. If the estimates exposed thus far reflect intra-industry spillovers, then we should observe no reaction when another company from a different sector enters a tax haven. The result validates this and, therefore, reinforces the previous results.<sup>5</sup>

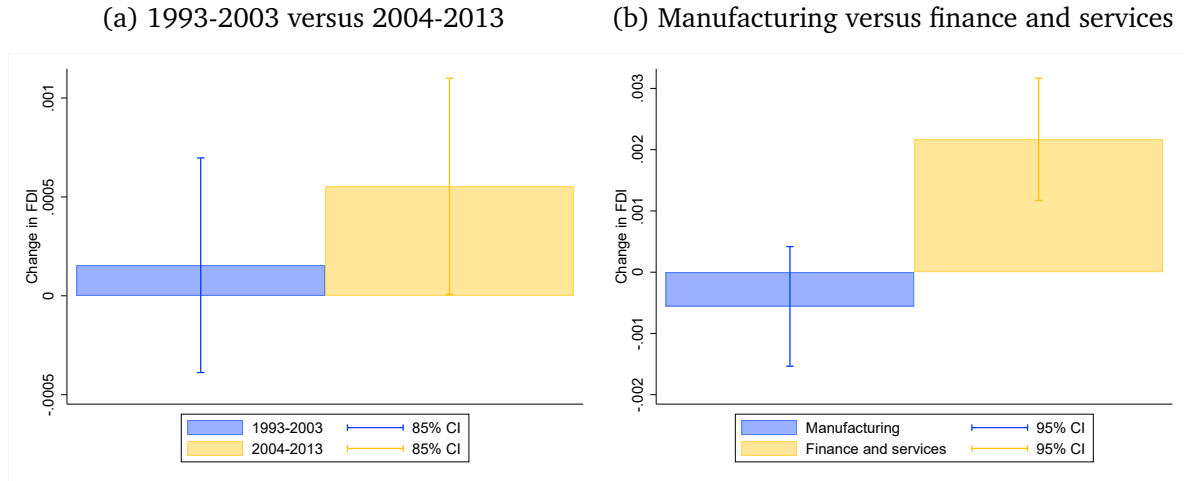
**Heterogeneous effects** Before concluding, I explore the existence of heterogeneous effects. [Grubert \(2012\)](#) and [Klassen and Laplante \(2012\)](#) find that profit shifting of US MNEs increases over time. Another stream of research emphasizes substantial industry-specific heterogeneity in profit shifting. In particular, [Gumpert et al. \(2016\)](#) and [Merz and Overesch \(2016\)](#) show that profit shifting is more intense in services and financial sectors compared to manufacturing. Drawing on these contributions, I study whether spillover effects are larger (i) between 2004 and 2013 and (ii) in services and financial sectors

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4. The two lists share 35 tax havens. Nonetheless, the classification of [Dyreng and Lindsey \(2009\)](#) is the only one to enumerate Aruba, Costa Rica, Guernsey, Jersey, Malaysia, Mauritius, Nauru, Niue, Samoa, San Marino, and Seychelles. On the other hand, [Hines and Rice \(1994\)](#), as opposed to [Dyreng and Lindsey \(2009\)](#), retain the British Virgin Islands, Jordan, Maldives, Saint Martin, Channel Islands, and UK Caribbean Islands.

5. In the appendix, figures [A1](#), [A2](#), and [A3](#) replicate figure 3 for panels B, C, and D of table 2.

FIGURE 4 – Heterogeneous effects



Notes. These graphs compare the intensity of spillovers over time and across sectors. Standard errors are clustered at the firm-year level. See section 3 for more details.

(SIC 60-67, SIC 70-88) than in manufacturing (SIC 20-39). To do so, I run regression (1) on the four corresponding subsamples. Figure 4 graphically depicts the regression results and supports the two hypotheses. Spillovers are indeed stronger in the second subperiod (figure 4a) and in services and financial industries (figure 4b).

## 4 Conclusion

Using information on subsidiaries of US-listed companies in tax havens and an event study, I unveil in this paper the existence of intra-industry spillovers of profit shifting. A firm is more likely to own a subsidiary in a specific tax haven once another firm in the same industry establishes a physical presence in this tax haven. The probability increases on average by 37 percent 5 years post peer entry. The results pass several robustness checks and suggest that firms tend to duplicate the tax dodging schemes of their peers. From a policy point of view, it means that auditing peers of firms accused of profit shifting could help public authorities deter profit shifting. This paper leaves a number of questions for future research. More work is needed to identify the exact channels whereby profit shifting diffuses across firms and, eventually, to quantify their relative contribution.

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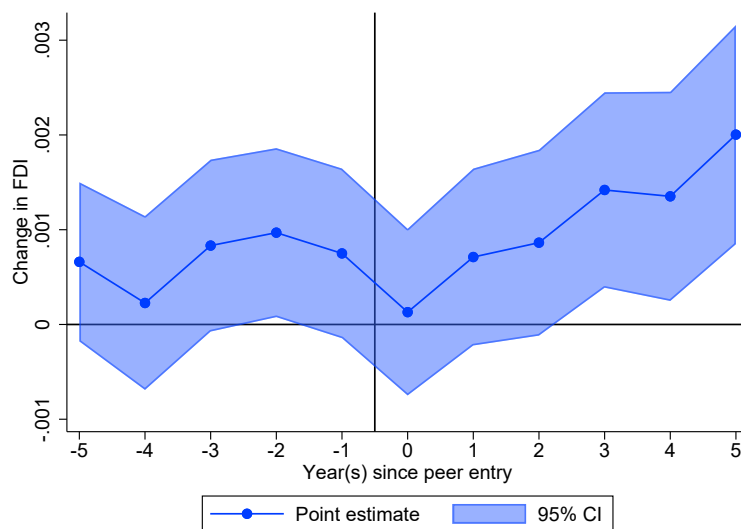
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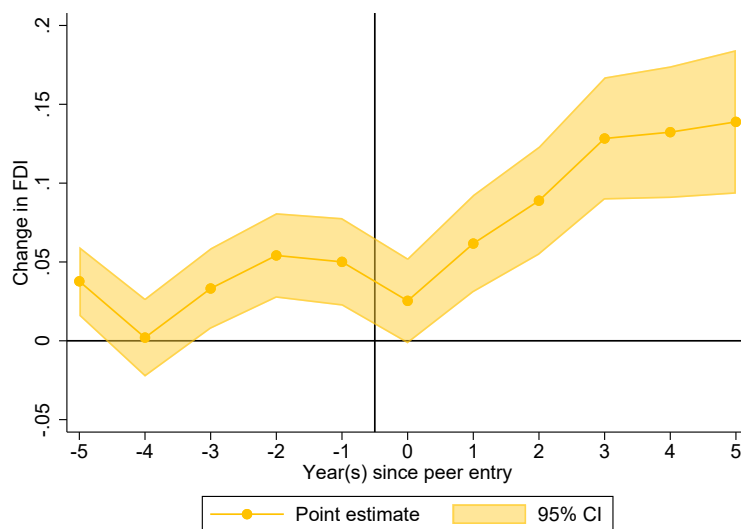
# Appendix

FIGURE A1 – Sensitivity checks (1)

(a) Use of  $TREAT^C$

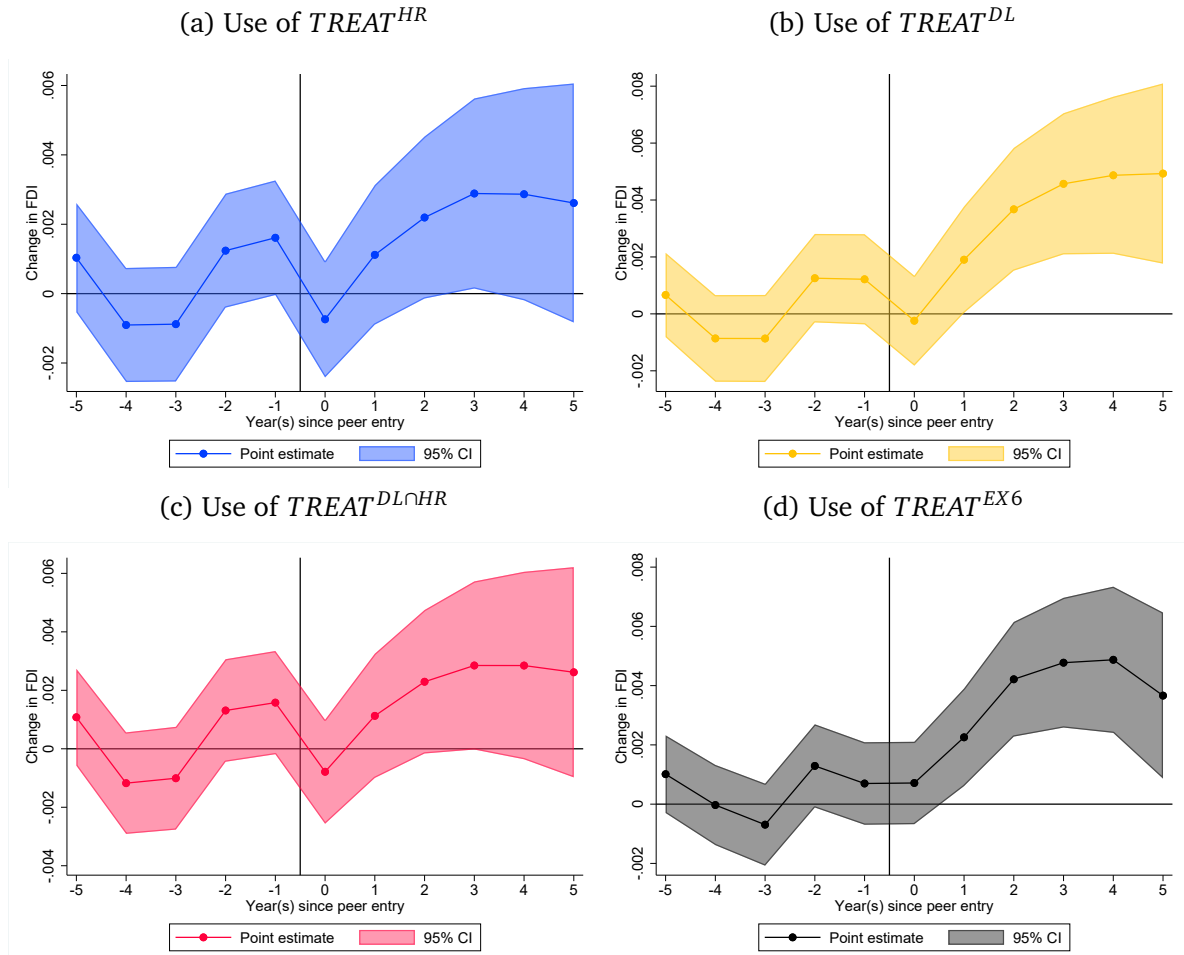


(b) Use of  $SHARE$



Notes. These figures reproduce figure 3 for table 2 panel B. Standard errors are clustered at the firm-year level. See section 3 for more details.

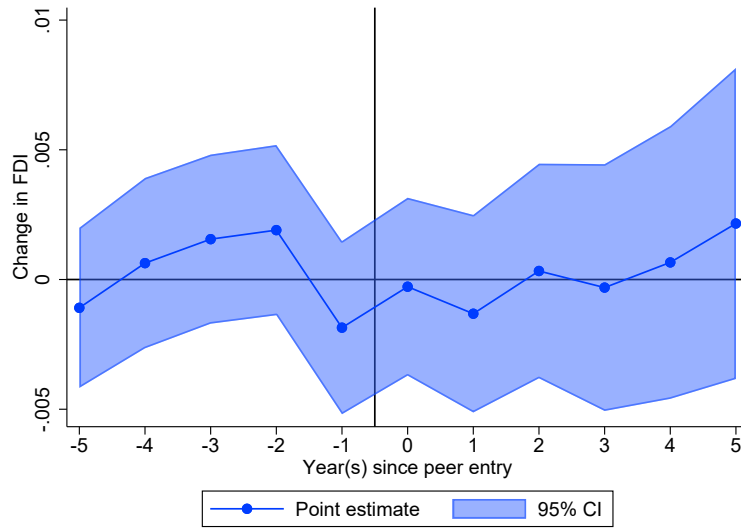
FIGURE A2 – Sensitivity checks (2)



Notes. These figures reproduce figure 3 for table 2 panel C. Standard errors are clustered at the firm-year level. See section 3 for more details.

FIGURE A3 – Sensitivity checks (3)

(a) Use of  $TREAT^{random}$



Notes. This figure reproduces figure 3 for table 2 panel D. Standard errors are clustered at the firm-year level. See section 3 for more details.