Corporate taxation, debt financing and foreign-plant ownership

Peter Egger a, Wolfgang Eggert b, Christian Keuschnigg c, Hannes Winner d

Abstract

This paper compares domestically and foreign-owned plants with respect to their debt-to-assets ratio and analyzes to which extent the difference is systematically affected by corporate taxation. To derive hypotheses about influence of corporate taxation on a firm's debt financing we adapt a standard model of taxation and financing decisions of firms for the case of international debt shifting activities of foreign-owned firms. We estimate the average difference between a foreign-owned and a domestically owned firm's debt ratio, treating the mode of ownership as endogenous. Using data from 32,067 European firms, we find that foreign-owned firms on average exhibit a significantly higher debt ratio than their domestically owned counterparts in the host country. Moreover, this gap in the debt ratio increases with the host country's statutory corporate tax rate.

Introduction

There is a large body of literature indicating that the financial decisions of firms are systematically affected by company taxation (see Graham, 2003, for a comprehensive survey). Most importantly, interest on debt is deductible from the tax base, while the return on equity is not and, therefore, firms have an incentive to raise leverage above the optimal level without taxation. The tax-induced advantage of debt increases with the statutory corporate tax rate, and it exists irrespective of whether a firm is owned by a domestic or a foreign shareholder. A multinational firm, however, is able to minimize its tax payments by allocating debt over all locations where it operates. The tax savings due to debt shifting depend on the differential between the parent and the host country statutory corporate tax rates. Accordingly, multinationals can reduce their tax payments by shifting debt from a low-tax jurisdiction to a high-tax jurisdiction taking advantage of the high-interest deduction in the high-tax jurisdiction (see, e.g., Mintz and Smart, 2004, for a theoretical analysis).
To identify the existence and the extent of debt shifting, previous empirical research relied on a sample of multinational firms exclusively (Hines, 1997, Devereux, 2006, provide comprehensive surveys). For instance, Desai et al. (2004) use a dataset of U.S.-owned foreign companies, and Huizinga et al. (2008) focus on a large dataset of European multinationals. Both studies find that the financing decisions of multinational firms are systematically affected by corporate taxation. One concern with this evidence is that the estimates may be influenced by the non-random selection of a sample of multinational firms.

This paper is rooted in the aforementioned research, but the identification strategy is different. Taking into account that multinational firms have more opportunities to exploit tax-induced advantages of debt financing than national firms, we argue that a comparison of the debt-to-asset ratio (henceforth DR) of comparable foreign- and domestically owned firms provides an estimate of the extent to which debt financing is influenced by foreign-plant ownership. Hence, in contrast to previous empirical work, we explicitly use national firms as a reference category to assess the effect of foreign-plant ownership on debt financing decisions. We adapt a standard model of taxation and financing decisions of firms for the case of international debt shifting activities of foreign-owned firms. The theoretical framework delivers testable hypotheses on (i) the average difference between the DR of national and multinational firms, and (ii) how this difference is influenced by the corporate tax burden in the host country. We test these predictions using a large dataset of 32,067 European firms. In line with a large body of theoretical and empirical research, we treat foreign-plant ownership as endogenous. Technically, we use propensity score matching techniques to avoid the potential bias of the treatment effect of foreign-plant ownership on firm level DR. Our findings suggest that foreign-owned firms display a higher DR than their domestically owned counterparts. Further, we observe that this difference increases with the corporate tax burden of the host country. These results point to the potential importance of debt shifting as a widely used practice in international tax planning of multinational firms.

The remainder of the paper is organized as follows. In the next section we employ a model with financing decisions to derive the main hypothesis regarding the effects of taxation on the debt policy of domestically and foreign-owned firms. Section 3 discusses the estimation approach, presents the data and the estimation results. Finally, Section 4 concludes.

Section snippets

The model

To motivate our empirical analysis, we provide a simple model based on King (1974) and Auerbach (1979), in which the financial decisions of firms are influenced by corporate taxation. We extend this framework to account for financial decisions of multinational enterprises (MNE) operating through subsidiaries in \( j = 0, \ldots, n \) locations. Tax rates differ across countries, opening up possibilities for tax arbitrage and global tax savings. In particular, a subsidiary in a low-tax country can give a...

Econometric approach

According to statement (iv) from above, it seems natural to think of the decision to participate in (be part of) a multinational network as being endogenous. In this case, the unconditional comparison of DR between national and multinational firms leads to a biased estimate of the effect of multinational...
ownership on DR. There are several econometric procedures available to restore unbiased causal effects of some binary treatment such as multinational ownership on some outcome such as DR. One...

Conclusions

In most tax systems, interest on debt is deductible from the tax base, while the return on equity is not. This tax shield of interest deduction creates an incentive to raise leverage, irrespective of whether a firm is held by a domestic or a foreign owner. In contrast to national firms, however, multinationals are able to allocate debt over the jurisdictions where they operate, giving additional tax-induced incentives for influencing a firm's financial structure. This paper investigates this...

Acknowledgments

We are very grateful to editor Thomas A. Gresik and two anonymous referees for very helpful comments on an earlier version of the paper. Further, we would like to thank the participants at the annual meeting of the IIPF in Warwick for comments and suggestions. Financial support from the Austrian Fond zur Förderung der wissenschaftlichen Forschung (FWF, Grant no. P17713-G05) is gratefully acknowledged....

References (41)

D.B. Rubin

*Formal modes of statistical inference for causal effects*

Journal of Statistical Planning and Inference (1990)

G.A. Plesko

*An evaluation of alternative measures of corporate tax rates*


J. Mintz *et al.*

*Income shifting, investment, and tax competition: theory and evidence from provincial taxation in Canada*


H. Huizinga *et al.*

*Capital structure and international debt shifting*


J. Graham

*Proxies for the corporate marginal tax rate*


R. Gordon *et al.*

*Do taxes affect corporate debt policy? Evidence from U.S. corporate tax return data*

Journal of Public Economics (2001)

M.P. Devereux *et al.*

*Taxes and the location of production: Evidence from a panel of US multinational firms*

Cited by (49)

The tax-efficient use of debt in multinational corporations
2021, Journal of Corporate Finance

Show abstract

Multinational enterprises and corporate tax planning: A review of literature and suggestions for a future research agenda
2020, International Business Review

Show abstract

Understanding the interaction of motivation and opportunity for tax planning inside US multinationals: A qualitative study
2019, Journal of World Business

Citation Excerpt:
...The level of risk attached to the loan however, will influence the appropriate rate of interest and may not be easily observed by those outside the firm. Previous research has identified unusually high levels of debt in high tax countries (Egger, Eggert, Keuschnigg, & Winner, 2010; Gordon & Lee, 2001) but no research has been conducted on the firm characteristics that enable this transfer to take place. MNEs that have made losses in the past are able to use these to offset against future tax liabilities....

Show abstract

Does the debt tax shield distort ownership efficiency?

Show abstract

Immobilizing corporate income shifting: Should it be safe to strip in the harbor?
2017, Journal of Public Economics
A multinational can use internal debt to shift profits out of a high-tax country in two ways: by choosing the amount of internal debt and by choosing the interest rate it will charge. To moderate the tax revenue losses from both choices, a host country can adopt a thin capitalization rule to limit the amount of internal debt and it can audit the interest rate a subsidiary pays on internal debt to assess compliance with an arm's-length standard. The arm's-length standard is imposed as part of a host country's transfer price regulations and is used to ensure that the interest rate is in line with what a third-party lender would charge for a loan of comparable size, term, and risk.

Why countries differ in thin capitalization rules: The role of financial development
2017, European Economic Review
Show abstract ✖

Recommended articles (6)

Research article
Taxation and the allocation of risk inside the multinational firm
Journal of Public Economics, Volume 183, 2020, Article 104138
Show abstract ✖

Research article
Capacity decisions with debt financing: The effects of agency problem
Show abstract ✖

Research article
How does managerial opportunism affect the cost of debt financing?
Show abstract ✖

Research article
The global agglomeration of multinational firms
Show abstract ✖

Research article
Profit shifting and investment effects: The implications of zero-taxable profits