

Prof. CARLO GARBARINO

Curriculum Vitae

Legal Studies Department

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Carlo Garbarino is Full Professor of Tax Law at Bocconi University and at Bocconi School of Management where is the Director of the Tax and Accounting Observatory of SDA Bocconi.

He is a Professor of tax law for the Department of Legal Studies at Università Bocconi where he is a faculty member of the Master in tax law and coordinator of the International taxation module. He is a member of the International Fiscal Association and the European Association of Tax Law Professors.

The main areas of his research are: corporate tax strategies, comparative tax law, legal theory, tax treaties, international tax policy, EU tax law and global tax governance.

He is the author of several monographies (in Italian) “La tassazione del reddito transnazionale”, “La tassazione del capitale e delle poste del patrimonio netto”, “Tassazione ed effettività”, “Tassazione delle società e dei gruppi”, “Diritto convenzionale tributario”. “Imposizione minima globale” (2024) and of the handbook “Tassazione internazionale” (2015). He has also published monographs in English (“Judicial application of tax treaties” and “Taxation of bilateral investments”). He is the Editor of “Pillar Two of the Inclusive Framework on BEPS: A Problem-solving Approach” (2024 Elgar).

He mainly works in international tax and has participated in numerous international conventions in top universities including: Stockholm, Max Planck, Louvain, Michigan, Sao Paulo, Washington D.C., OECD Paris, Beijing, Paris Sorbonne and HEC, European Parliament, Cracow, London, Oxford, Lisbon, Lund, Melbourne, Sidney.

At SDA Bocconi, he has directed numerous executive courses in the tax area, including “Corporate Taxation”, “Transfer Pricing”, “Digital Economy: legal, tax and regulatory aspects”, “Tax assessments and litigation”, “Corporate tax strategies”. At SDA his main research area is the impact of the tax variable on managerial behavior: together with the Associazione Fiscalisti di Impresa (Association of Tax Managers), he has led significant empirical research studies into the role of the

tax director in Italian corporations, and corporate tax governance. In 2016 and 2017 he hosted two seminal international conferences at SDA Bocconi on aggressive tax strategies and BEPS with prominent opinion leaders, and he has organised various workshops on current topics in corporate taxation (including “Tax complexity in Italy” and “The Financial Bill 2019 and the transposition of the ATAD”).

He was an academic delegate at the European Association of Tax Law Professors annual meeting (Madrid 2019). He has also taught in the main European tax masters (in particular, Vienna, Leiden, Sorbonne).

He was a visiting professor at NYU Law School in 2013, 2016 and 2020 where he was a Senior Emily Noel Fellow and a Hauser Global Visiting Faculty, University of Michigan (2009-2010-2014), University of Florida (2011), Università di Sao Paolo (2012), Melbourne Law School (2018).

His thorough knowledge of domestic law is matched by that of international matters, with particular attention to the emerging issues of global governance. He developed a comparative approach in the tax field connected to the circulation of policy models, resonant with the latest developments in institutional law and economics. Part of the top 5% SSRN, he is one of the most well-known scholars of comparative and international taxation. Recently he has worked on global tax governance and tax sustainability.

He has published numerous scientific papers and books in his field of study. His works have been published in leading journals such as the Harvard International Law Journal, British Tax Review and the Columbia Journal of Tax Law, the American Journal of Comparative Law Intertax, EC Tax Review, European Taxation. Eur. Bus. Law Rev, Eur. Company and Financial Law Review. He has received numerous recognitions, such as a Rotary Foundation Grant. He is the editor of the EGEA series “Comparative and International Taxation” and Director of *Fiscalità e Commercio Internazionale*, a member of the Editorial Committee of the EC Tax Review, Intertax, *Economia & Management* (2008-2010), and of the *Alta Scuola Formazione, Fondazione dei Dottori Commercialisti*.

He graduated with a law degree from the Università di Genova, with a publication of his thesis. Subsequently, he earned his LLM from the University of Michigan and completed his PhD under a program of the the Università di Genova and Yale Law School, where he was a Visiting Scholar under a Rotary Foundation Scholarship. He started his academic career at the Università di Siena and has been teaching at Bocconi since 1999.

Teaching domains International Taxation Tax and Legal Planning Transfer Pricing Business Law

### **Latest publications**

Brexit e disapplicazione della giurisprudenza della Corte di Giustizia dell'Unione Europea *Fiscalità & Commercio Internazionale*, 2021, vol.8-9, pp.23-27

La nozione di beneficiario effettivo nella giurisprudenza UE (Case C-115/16; Case C-116/16) *Fiscalità & Commercio Internazionale*, 2021, vol.11, pp.46-50

Normative mind and mental content of rules *Materiali per una Storia della Cultura Giuridica*, 2021, vol.1, pp.157-183

Social, Moral and Legal Rules, Biopolitics and the Covid-19 Crisis *Global Jurist*, 2021, pp. 20210060

Cosmopolitan Rights, Global Tax Justice, and the Morality of Cooperation *Florida Tax Review*, 2020, vol.23, no. 2

Normative Mind and Mental Content of Rules, in *Materiali per una storia della Cultura Giuridica*, 2021, pp.157-183

New Glocal Forms of Financial Participation and Revenue Mobilization, *Glocalism: Journal of Culture, Politics and Innovation*, 2021, p. 1-25

Comparative analysis of profit distributions, *Journal of Comparative Law*, 2022, pp. 133-156

Tax Treaties and the Mobility of Workers, *European Business Law Review*, 2022, 935-956

The architecture of the country-by-country minimum tax regime proposed by the United States, 2022, *Florida Law. Rev.*, 25:2

Regulatory Competition, Coordination and Polity Convergence in the Covid Ecosystemic Crisis: A Policy Approach, 2022, *Global Jurist*, pp. 1-30

FATCA legislation and its application at international and EU level: - an update, *European Parliament – Policy Department for Citizens’ Rights and Constitutional Affairs*, pp. 1-22

A Critical Evaluation of the International Impact of the Global Minimum Tax, *International Tax Studies*, 2022 (Volume 05), No. 6

Tax Convergence and the Next Generation European Union, *European Taxation, European Taxation*, 2022, 319-328

## **Books**

La tassazione delle società e dei gruppi Giappichelli Editore, Italy, 2021

Pillar Two of the Inclusive Framework on BEPS: A Problem-solving Approach, 2024, Elgar, pp. 454.

Imposizione minima globale, 2024, Torino, pp. 532

## **Grants & Honors**

Excellence in Research Award - Università Commerciale Luigi Bocconi , 2012

Excellence in Research Award - Università Commerciale Luigi Bocconi , 2011

Excellence in Research Award - Università Commerciale Luigi Bocconi , 2010

Rotary Foundation Grant - The Rotary Foundation , 1986