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DO MULTINATIONAL FIRMS RESPOND TO PERSONAL
DIVIDEND INCOME TAX RATES?

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Do multinational firms respond to personal dividend income tax rates?*

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Abstract

This study examines the effect of investor-level income taxes on profit repatriation and dividend payout policies of multinational firms. The empirical estimations include two million firm-year observations in 130 countries. By augmenting the Lintner model of dividend payments, I employ parametric as well as semiparametric techniques to provide evidence that income taxes on dividends neither alter dividend payments to investors nor within-firm dividend payments. These results remain robust to a wide range of alternative specifications.

Keywords: Dividend income taxes, dividend payments, Lintner model.

JEL classification: C14, D22, F23, H24, H26

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1 Introduction

Should governments tax investor-level dividend income or not? During the last decades, this topic has received increased attention in the public debate and the literature. Since wealthy people have the means to invest in shares and therefore generate disproportionately large dividend incomes, it is often considered as fair to impose high taxes on dividends. However, taxing dividend income might distort the allocation of capital. Investors might find it less worthwhile to invest their savings in shares, or they could simply move their capital abroad. Furthermore, firms might decide to lower dividend payments to reduce the tax burden of their shareholders.

If firms adjust their dividend payments in response to tax changes, firms might also update how much profits they repatriate from the firms they possess. If firms aim at decreasing dividend payments, they might find it optimal to repatriate a lower share of these profits. Hence, higher investor-level taxes on capital might reduce the inflow of capital from abroad. Gaining more insights on this topic will increase our understanding of the potential cost governments face if they increase dividend income taxes. The investigation of these tax effects is the purpose of this paper.

The effect of changes in the dividend tax rate (*DTR*) on dividend payments (*DIV*) has already been discussed in the literature; the results suggest that dividend payments increase in response to lower tax rates (e.g., Poterba, 2004; Chetty and Saez, 2005). However, most studies are based on the US dividend income tax cut in 2003. This paper attempts to extend this approach by basing the econometric analysis on a large panel dataset including several reforms in different countries.

The conceptual framework is based on the Lintner model (Lintner, 1956) which serves as the theoretical workhorse in the literature on dividend payments. The econometric analysis exploits balance sheet data from more than 1.3 million firms and a tax dataset which covers 165 countries. What makes this tax dataset unique is that it not only includes taxes on earned income for such a large number of countries, but also a wide range of other income taxes like the tax on dividend income. First, I replicate the Lintner model

using different specifications. I find very similar results compared to previous studies. In a second step, for each firm, I include the tax rate of the country where the highest firm within the associated multinational firm (MNF) network resides. Henceforth, I will refer to this firm as the *GUO* (global ultimate owner). I do not only implement a standard parametric model for the econometric analysis, but I also allow for heterogeneous effects of the tax by means of a semiparametric approach. Furthermore, I present different robustness checks including alternative specifications and different subsamples.

The results indicate that investor-level dividend income tax rates do not play a significant role in the size of dividend payments, neither for dividend payments to investor-level shareholders nor for within MNF dividend payments. This suggests that the cost of increasing investor-level dividend income taxes are smaller than previous studies suggest.

This paper is structured as follows: I start with a review of the relevant literature in Section 2. The review is followed by a discussion of the conceptual framework and the empirical implementation in Sections 3 and 4. Section 5 provides a description of the data and some first evidence of the tax effect. The results are presented in Section 6, which is followed by a discussion of the robustness checks in Section 7. Section 8 concludes.

2 Related literature

Among the earliest and most influential studies in the literature on the dividend policy of firms is the seminal work by Lintner (1956) who discusses the determinants of dividend payouts on the basis of survey evidence. However, while Lintner was concerned with the determinants of dividend payout, it was far from clear why firms pay dividends at all. In fact, following the Modigliani-Miller theorem (Modigliani and Miller, 1958), in perfect capital markets, dividend payout policies of firms are not only irrelevant to the wealth of investors. Instead, retained earnings seem to be superior compared to dividend payments since capital gain taxes tend to be lower than dividend income taxes. Following Black (1976), this contradiction is often referred to

as the Dividend Puzzle. This irrelevance finding was followed by a series of studies that aim at solving the Dividend Puzzle by providing rationals in favor of dividend payments. Shefrin and Statman (1984) argue that investors prefer a smooth and reliable dividend income stream over time compared to a large one-off payment at the moment when the stock is sold, due to unpredictable price fluctuations of the share. Similarly, Brennan (1971) assumes that dividend payments act as an insurance since firms may become insolvent before investors sell their share. A further rationale is provided by Ross (1977), Miller and Rock (1985), John and Williams (1985) and Ambarish et al. (1987), who ascribe dividend payments to the signaling of firms to inform investors of the conditions of the firm.

Many studies in this context rely on the Lintner model (Lintner, 1956) which serves as the workhorse in the literature on dividend payouts. In short, it states that dividend payments depend positively on the desired payout ratio and former dividend payments. Hence, firms do not just set dividend payments according to the desired payout ratio but also aim at a smooth dividend payment stream over time. Lintner (1956) estimates a target-payout ratio of 50% and a speed of adjustment coefficient of 30%, Babiak and Fama (1968) obtain similar results. Desai et al. (2002) estimate the payout ratio to be larger for subsidiaries in high-tax countries. As dividends are, in a statistical sense, left censored (they cannot fall below zero), they base their estimations on the Tobit model. Desai et al. (2007) use the Lintner model to investigate how taxation, costly external finance, and agency problems influence internal capital markets. Distinguishing between firms with and without a bond rating, Aivazian et al. (2006) find that the first exhibit a strong taste for dividend smoothing while the latter put more emphasis on a smooth dividend payment stream, i.e., adhering more to the payout ratio. Lehmann and Mody (2004) estimate the Lintner model in a within-MNF setting using the Arellano-Bond estimator.

Based on the Lintner model, Bellak and Leibrecht (2010) find a negative effect of taxes on dividend repatriations of German parent companies from foreign affiliates. Furthermore, the authors introduce a solution for the “initial conditions problem,” i.e., while dividend payments depend on past

dividend payments, typically, the first payment is unobserved. Accounting for this problem leads to a larger estimated speed of adjustment coefficient. Also, they provide a detailed literature review on the Lintner model; a meta-regression analysis can be found in Fernau and Hirsch (2019). These results are in line with a wide range of qualitative studies, see G. E. Powell (2009) for a summary.

Having discussed the literature on how and why firms pay dividends, I now turn to the literature on dividend taxation.

One strand of this literature is concerned with the effect of investor-level income taxes on firm behavior. Chetty and Saez (2005) estimate a substantial increase in dividend payments in response to the US personal dividend income tax cut in 2003 (Jobs and Growth Tax Relief Reconciliation Act), Hanlon and Hoopes (2014) find that firms anticipated the dividend tax increases in 2011 and 2013 by shifting tax payments to the year prior to the tax increase (i.e., 2010 and 2012). Poterba (2004) finds similar results. However, using a difference-in-differences approach based on C- and S-corporations,¹ Yagan (2015) finds no effect of the 2003 tax cut on real investments of the firm. Following the argumentation of the author, this supports the so-called “new-view” hypothesis of dividend taxation which states that marginal investments are financed with retained earnings instead of newly issued equity. Alstadsæter et al. (2017) find similar results in response to changes in the Swedish dividend tax concerning the level of investment. However, they report changes in the allocation of investment.

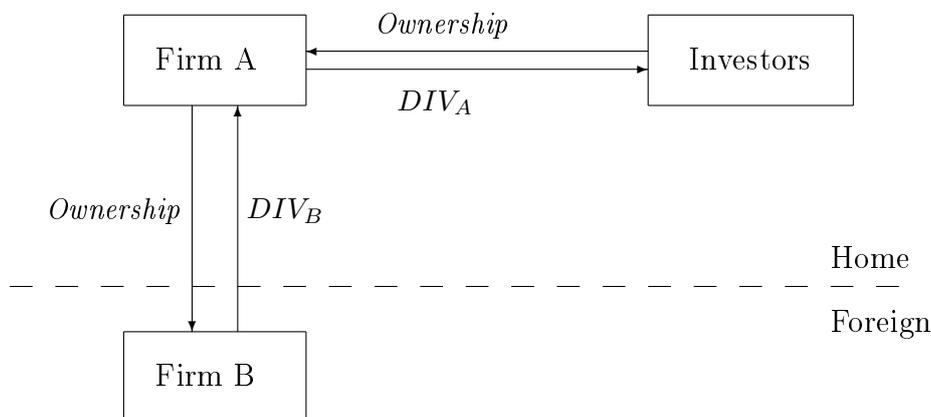
A further strand is concerned with dividend repatriation taxes of US MNEs. Grubert (1998) provides a comprehensive analysis on how US dividend repatriation taxes affect royalty, dividend, interest and retained earnings of US multinationals’ foreign affiliates. Altshuler and Grubert (2003) discuss optimal strategies for the repatriation of profits from low-tax countries to the US. Similarly, Desai et al. (2007) and Hanlon, Lester, et al. (2015) explore the effect of US repatriation taxes on intra-firm dividend payments.

¹In the US, firms are categorized into C- and S-corporations. The only major difference is the fact that C-corporations are subject to dividend taxation while S-corporations are not.

3 Dividend repatriation and income taxes

3.1 Dividends and taxes

As discussed in the literature review above, different studies find supportive evidence that firms adjust dividend payments in response to investor-level dividend income taxes in their own country. However, to the best of my knowledge, these studies do not take into account that MNFs might, in addition, adjust their intra-firm dividend payments in response to investor-level income tax changes. For illustrative reasons, consider the following example:



Individual-level investors buy shares of a firm A and participate in the profits of A through dividend payments (DIV_A in the figure). So far, previous studies examine to which extent investor-level dividend income tax rates in country $HOME$ influence these dividend payments. However, in the context of MNFs, the profits of firm A do not only include the profits generated by firm A , but also the profits of B (the firm that is owned by A). Hence, if firm A indeed adjusts its dividend payments to its shareholders due to changes in investor-level income taxes, it might be reasonable for firm A to also adjust the repatriation of profits of the firms it owns (DIV_B in the figure). The goal of this paper is to examine if these dividend payments are responsive towards investor-level dividend taxes, i.e., if investor-level dividend income tax rates levied in country $Home$ effect both dividend payments DIV_A and DIV_B .

A further question that this paper is concerned with is if the effect of the tax (if there is any at all) is constant or if the effect changes with the size of the tax rate. For example, one could imagine a five percentage point increase in the tax rate to have a lower effect if it results in an overall tax rate of 25% instead of an overall tax rate of 60%. The econometric analysis allows for these heterogeneous effects of the tax rate by means of the semiparametric Baltagi-Li estimator.

In the following, I first introduce the Lintner model of dividend payouts and, in a next step, extend the model where I include the dividend tax rate, as well as further control variables. Subsequently, I discuss the econometric techniques that are applied.

3.2 The standard Lintner model of dividend payouts

As discussed above, the Lintner model (Lintner, 1956) is commonly used in the literature to model dividend payments between firms and investors. This section provides a formal set-up of the Lintner model and discusses how investor-level dividend income taxes may alter dividend payments.

The basic Lintner model proposes that dividend payments DIV_{it} of firm i in time t are the result of an adaptive process driven by the trade-off between the aim to generate a smooth dividend payment stream over time and the desired long-run dividend payment $DIV_{it}^* = r\Pi_{it}$ with r being the desired long-run payout ratio and Π_{it} profits. Since the model considers changes in dividend payments over time, it is sometimes also referred to as the partial adjustment model of dividends.

Equation (1) serves as the starting point:

$$\begin{aligned}\Delta DIV_{it} &= \alpha + s(DIV_{it}^* - DIV_{it-1}) + u_{it} \\ &= \alpha + s(r\Pi_{it} - DIV_{it-1}) + u_{it}\end{aligned}\tag{1}$$

with constant α and error term u_{it} .

The Lintner model postulates that the change in the dividend payment from period $t - 1$ to t is not equal to the difference of dividend payments in

$t - 1$ and the desired long-run dividend payment $DIV_{it}^* = r\Pi_{it}$, but equal to the fraction s thereof (i.e., the trade-off mentioned above).

The idea is that current dividend payments arise as a compromise between the hypothetical, optimal current level of dividend payment DIV_{it}^* and the dividend payment in the period before DIV_{it-1} . Lintner (1956) observed that firms tend to set a long run desired payout ratio r which determines the share of profits which is paid out to shareholders in the form of dividends. However, as changes in profits are not always sustainable, managers are reluctant to fully adjust dividend payments to changes in profits Π_{it} since managers are especially unwilling to decrease dividend payments as this would signal that the firm is in a bad state. Therefore, managers only increase dividend payments very carefully to avoid having to return to the initial level. Hence, managers prefer to change dividend payments only gradually if Π_{it} changes. This feature is captured by the smoothing parameter s which dampens the change in the dividend payment related to a change in Π_{it} . Note that a stronger taste for a smooth dividend payments stream leads to a *smaller* smoothing parameter, which might be counter-intuitive in the first moment. However, a larger s increases changes in the dividend payment in response to a deviation of current profits from past profits, while a lower s reduces changes in the dividend payments over time.

In summary, current dividend payments DIV_{it} are driven by the firm's profits in t through the pay-out ratio r and the smoothing parameter s which represents the speed of adjustment towards DIV_{it}^* . Dividends are thus not set independently in each period t but are serially correlated. Consequently, a higher r increases dividend payments in t while a higher s increases the impact of current profits on current dividend payments. Equation (2), which I obtain by rearranging (1) and setting $s = 1$, makes this point clearer. In this extreme case, there is no influence of dividend payments in $t - 1$ on t at all:

$$\begin{aligned}
DIV_{it} - DIV_{it-1} &= \alpha + sr\Pi_{it} - sDIV_{it-1} + u_{it} \\
\Leftrightarrow DIV_{it} &= \alpha + sr\Pi_{it} + (1-s)DIV_{it-1} + u_{it} \\
&= \alpha + r\Pi_{it} + u_{it}.
\end{aligned} \tag{2}$$

While this set-up might suggest, at first glance, that the adjustment of dividend payments is equally flexible for increases and decreases, Lintner (1956) expected that firm managers would be more reluctant to decrease than to increase dividend payments (as already discussed above). Hence, the Lintner equation includes a constant α which allows for positive dividend payouts even in cases where profits are negative.

The error term u_{it} is sometimes modeled as $u_{it} = \eta_i + \phi_t + \epsilon_{it}$ to allow for firm fixed effects η_i and aggregate time shocks ϕ_t (like in, e.g., Bellak and Leibrecht, 2010). η_i might, for example, reflect firm-specific distastes of reducing the dividend payments. I allow for this specification of the error term in the econometric analysis.

Following Lehmann and Mody (2004), an alternative approach to derive the Lintner model as represented in (2) is based on the minimization of the following loss function:

$$\Omega_{it} = \phi_1 \left(DIV_{it} - \underbrace{r\Pi_{it}}_{=DIV_{it}^*} \right)^2 + \phi_2 (DIV_{it} - DIV_{it-1})^2. \tag{3}$$

The first term captures the goal to adjust the actual dividend payment to the desired long-run dividend payment while the second term incorporates the disutility of a volatile dividend payment stream. The parameters ϕ_1 and ϕ_2 represent the weights firms place on these two objectives. Minimizing the loss function with respect to DIV_{it} yields

$$D_{it} = \frac{\phi_1}{\phi_1 + \phi_2} r\Pi_{it} + \frac{\phi_2}{\phi_1 + \phi_2} D_{it-1}. \tag{4}$$

Normalizing the sum of the weights ϕ_1 and ϕ_2 to 1 produces (2) (if we add the constant α to account for the reluctance of managers to reduce dividend

payments as above, and the error term u_{it}).

Note that the Lintner model has not only been used to model dividend payments of firms to shareholders but also in the context of intra-firm dividend payments like it is the focus of this paper (see, e.g., Desai et al., 2002).

3.3 The Lintner model extended

According to the basic set-up of the Lintner model, current and previous profits are the only determinants of dividend payments of firms. This becomes obvious if (2) is solved recursively. However, there might be further firm and country characteristics like taxes that determine dividend payments. In the following, the model is augmented to allow for these additional factors.

There are different ways to augment the Lintner model. I follow Bellak and Leibrecht (2010) in extending the model utilizing the function $DIV_{it}^* = r\Pi_{it}^*$. Besides the optimal payout ($r\Pi_{it}$), I add investor-level income taxes (TAX_{kt})² and further country characteristics (\mathbf{X}_{kt}) of the country k where the *GUO* is located, as well as characteristics of firm i (\mathbf{X}_{it}) and country characteristics of country j (\mathbf{X}_{jt}) which is the location of firm i .³

$$\begin{aligned}\Delta DIV_{it} &= \alpha + s(DIV_{it}^* - DIV_{it-1}) + u_{it} \\ &= \alpha + s(r\Pi_{it} + f(TAX_{kt}) + \boldsymbol{\theta}_I \mathbf{X}_{it} + \boldsymbol{\theta}_J \mathbf{X}_{jt} + \boldsymbol{\theta}_K \mathbf{X}_{kt} - DIV_{it-1}) + u_{it}.\end{aligned}\tag{5}$$

The intuition behind extending the model utilizing the function $DIV_{it}^* = r\Pi_{it}^*$ is that, as argued above, DIV_{it} is a blend of DIV_{it-1} and DIV_{it}^* . If changes to the business environment lead to a change in the dividend setting behavior, they will be driven by adjustments of DIV_{it}^* as DIV_{it-1} has already been set in $t - 1$. Note that I do not restrict the effect of TAX_{kt} to have a

²Since the focus of the paper is on the dividend tax rate, I use the abbreviation of the dividend tax rate (DTR_{kt}) in most sections. However, since I also estimate specifications with the tax rate on capital gains ($CGTR_{kt}$), I use (TAX_{kt}) in the model as a more general abbreviation for taxes.

³I.e., the *GUO* and the affiliate may but do not necessarily have to be in the same country.

certain functional form since this effect might depend on the initial level of the tax rate (as argued above). Rather, I am using nonparametric techniques to estimate the effect of the dividend income tax on dividend payouts. Defining $g(\cdot) \equiv sf(\cdot)$, Equation (5) can be rearranged to

$$DIV_{it} = \alpha + sr\Pi_{it} + (1-s)DIV_{it-1} + g(TAX_{kt}) + s\theta_I X_{it} + s\theta_J X_{jt} + s\theta_K X_{kt} + u_{it}. \quad (6)$$

Equations (2) and (6) serve as the basis for the econometric analysis. In the following, I will discuss how these equations are implemented empirically.

4 Empirical implementation

4.1 Basic Lintner

In a first step, I estimate the basic Lintner model to compare the results of the Lintner parameters⁴ to the literature and hence to evaluate how the model performs in the context of data on MNFs. Furthermore, these results serve as a benchmark for the estimations where I include the tax rates. The basic Lintner model is based on Equation (2) and is estimated using standard OLS:

$$DIV_{it} = \alpha + \beta_1 \Pi_{it} + \beta_2 DIV_{it-1} + u_{it}. \quad (7)$$

The smoothing parameter s and the optimal payout ratio r are then given by

$$s = 1 - \beta_2 \text{ and } r = \frac{\beta_1}{s} = \frac{\beta_1}{1 - \beta_2}. \quad (8)$$

In some specifications, I allow for aggregate time shocks ϕ_t and firm fixed effects η_i in the error component, as discussed above: $u_{it} = \eta_i + \phi_t + \epsilon_{it}$.

⁴The Lintner parameters refer to the smoothing parameter and the long run desired payout ratio as defined in the model.

4.2 The Baltagi-Li estimator

It is ex-ante unclear which functional form the dividend tax effect follows. Without imposing any parametric specification on this functional form, I estimate the following equation:

$$DIV_{it} = \alpha + \beta_1 \Pi_{it} + \beta_2 DIV_{it-1} + g(TAX_{kt}) + \beta_3 \mathbf{X}_{it} + \beta_4 \mathbf{X}_{jt} + \beta_5 \mathbf{X}_{kt} + u_{it}, \quad (9)$$

which is based on Equation (6).

Again, I allow for aggregate time shocks ϕ_t and firm fixed effects η_i in the error component: $u_{it} = \eta_i + \phi_t + \epsilon_{it}$. The estimation of $g(TAX_{kt})$ is based on nonparametric methods to circumvent ex-ante restrictions on the functional form. The semiparametric Baltagi-Li estimator introduced by Baltagi and Li (2002) is well suited to be applied to this fixed effect semiparametric panel data model⁵.

The firm fixed effects η_i are eliminated by first differences which yields

$$\begin{aligned} \Delta DIV_{it} = & \beta_1 (\Pi_{it} - \Pi_{it-1}) + \beta_2 (DIV_{it-1} - DIV_{it-2}) + (g(TAX_{kt}) - g(TAX_{kt-1})) \\ & + \beta_3 (\mathbf{X}_{it} - \mathbf{X}_{it-1}) + \beta_4 (\mathbf{X}_{jt} - \mathbf{X}_{jt-1}) + \beta_5 (\mathbf{X}_{kt} - \mathbf{X}_{kt-1}) \\ & + (u_{it} - u_{it-1}). \end{aligned} \quad (10)$$

The main idea is to approximate the function $g(z_t)$ with variable z_t by a series $p^k(z_t)$, and hence to approximate $G(z_t, z_{t-1}) = \{g(z_t) - g(z_{t-1})\}$ by $p^k(z_t, z_{t-1}) = \{p^k(z_t) - p^k(z_{t-1})\}$, where $p^k(z_t)$ is a sequence of k functions $[p_1(z_t), p_2(z_t), \dots, p_k(z_t)]$.

As proposed by Libois and Verardi (2013), this series is estimated through linear B-spline series. For an intuitive explanation on regression splines, please refer to the appendix.

⁵The Baltagi-Li estimator has already been implemented hitherto in several fields of application to explore non-linear relationships. See for example Desbordes and Verardi (2012), Zhu et al. (2012), Baglan and Yoldas (2014), Lessmann (2014), Atkin et al. (2017), or Clemens et al. (2018).

Coming back to Equation (10), Baltagi and Li (2002) show that the parametric part is estimated under the standard \sqrt{N} normality. While the speed of convergence is smaller for the nonparametric estimate, this will not be a problem in the context of this analysis due to the size of the dataset.

I obtain the coefficients from the parametric part after estimating the following equation:

$$\begin{aligned}\Delta DIV_{it} &= \beta_1(\Pi_{it} - \Pi_{it-1}) + \beta_2(DIV_{it-1} - DIV_{it-2}) + \omega(\{p^k(TAX_{kt}) - p^k(TAX_{kt-1})\}) \\ &\quad + \beta_3(\mathbf{X}_{it} - \mathbf{X}_{it-1}) + \beta_4(\mathbf{X}_{jt} - \mathbf{X}_{jt-1}) + \beta_5(\mathbf{X}_{kt} - \mathbf{X}_{kt-1}) \\ &\quad + (u_{it} - u_{it-1}).\end{aligned}\tag{11}$$

If I use the result of this estimation to calculate the intercept $\hat{\alpha}$ subsequently⁶, I may estimate $g(TAX_{kt})$ according to the following equation:

$$\begin{aligned}\hat{r}_{it} &\equiv DIV_{it} - (\hat{\alpha} + \hat{\beta}_1\Pi_{it} + \hat{\beta}_2DIV_{it-1} + \hat{\beta}_3\mathbf{X}_{it} + \hat{\beta}_4\mathbf{X}_{jt} + \hat{\beta}_5\mathbf{X}_{kt}) \\ &= g(TAX_{kt}) + u_{it}.\end{aligned}\tag{12}$$

4.3 Instrumental variable strategy

If the estimators were implemented as introduced thus far, the results would be biased since I estimate a dynamic model with fixed effects (see, e.g., Wooldridge, 2010). Following Anderson and Hsiao (1982), I instrument DIV_{it-1} by DIV_{it-2} .

4.4 Further issues

As already discussed above, the basic Lintner model assumes only lagged dividend payments and current profits to determine dividend payments. Therefore, I first provide the results of the basic Lintner model with and without

⁶Using Equations (10) and (12), we see that ω secures the following equality: $\omega p^k(TAX_{kt}) = g(TAX_{kt})$. Therewith, I can construct the intercept: $\hat{\alpha} = DIV_{it} - \hat{\beta}_1\Pi_{it} - \hat{\beta}_2DIV_{it-1} - \hat{\omega}p^k(TAX_{kt}) - \hat{\beta}_3\mathbf{X}_{it} - \hat{\beta}_4\mathbf{X}_{jt} - \hat{\beta}_5\mathbf{X}_{kt}$.

firm fixed effects and time fixed effects, as well as with and without the DTR_{kt} .⁷ I then move on to present the results from the Baltagi-Li estimator. Following standard procedures, I use fourth-degree B-splines; optimal knots are chosen as described in Newson (2000). Equation (12) is then estimated by a kernel density using Epanechnikov kernels. I scale dividend payments (as in, e.g., La Porta et al., 2000; Fama and French, 2002), however, following the discussion in La Porta et al. (2000), I use turnover instead of assets. While assets are suitable if all firm observations are located in the same country, turnover is preferable if firms from different countries are considered. The main idea is that, compared to assets, turnover is less sensitive to differences in accounting standards and manipulative accounting practices across countries. Scaled variables are indicated by superscript S (e.g. DIV_{it}^S).

5 Data

5.1 Dividend income tax data

Most countries do not only levy taxes on earned income but also on capital income such as dividends. While some countries subsume all incomes together for tax purposes, about half of the countries have introduced separate taxes on capital income. Hence, it would not be appropriate to focus on earned income taxes. Therefore, I use the DTR_{kt} from the income tax dataset by Eklund and Wamser (2019) which provides a large range of different income taxes for 165 countries.

There are different ways of how countries collect dividend income taxes. In France, for example, taxpayers have to declare their dividend income to the tax authorities at the end of the year, which is in contrast to Germany that taxes capital income at source with a flat tax rate. Social security contributions are often levied at lower rates compared to the contributions on earned income.

The average DTR_{kt} equals 17.11% which is much smaller than the average

⁷Recall that I abbreviate the dividend tax rate in time t in country k (i.e. the country of the GUO) by DTR_{kt} .

tax rate on earned income (31.99%). Over the last decade, countries have decreased their $DTRS_{kt}$ by approximately 1 percentage point on average (18.17% in 2006, 17.06% in 2015). However, I observe strong within-country variation as shown in Figure 1. For a more in-depth analysis, see Eklund and Wamser (2019).

— Figure 1 about here —

5.2 Dividend payout data

I base my empirical analysis on financial firm-level data which I take from the *ORBIS* dataset provided by Bureau van Dijk. This dataset is well-suited for my analysis due to three different reasons: First, it provides detailed firm-level balance sheet data which allows me to calculate yearly dividend payments. Furthermore, it provides information on the ownership structure of the observed firms. Lastly, the raw dataset covers a vast number of different firms (about 280 million) in numerous countries.

I use information from the balance sheet data to calculate dividend payments since they are not directly observable. I follow the approach taken by Bellak and Leibrecht (2010) and Egger et al. (2015) where dividends follow from the difference between shareholder funds after current profits in $t - 1$ and shareholder funds before current profits in t .⁸ In principle, we can think of shareholder funds as the difference between assets and liabilities (minus minority interests), i.e., a sort of excess wealth which immediately could be handed out to the shareholders (ignoring liquidity constraints). Essentially, the approach taken is to compare this excess wealth between two subsequent periods. The difference gives the amount handed out to the shareholders.

One aspect of this paper is to estimate the effect of investor-level dividend income taxes on the repatriation behavior of firms within MNF networks. Hence, for each firm, I need to identify the MNF they belong to, as well as

⁸More specifically, I calculate dividends according to the following formula: $DIV_{it} = SHFD_{it-1} + PL_{it-1} - SHFD_{it}$ where DIV_{it} denotes dividends, $SHFD_{it}$ available shareholder funds for distribution and PL_{it} current profits of firm i in period t . Negative values are set to zero as in Egger et al. (2015).

the country where the headquarter of the MNF resides. In *ORBIS*, this is possible through identifying the so-called *GUO*.⁹ The *GUO* is defined as the highest level within an MNF, i.e., the last level of ownership which is not owned by a further firm.

For illustrative reasons, consider the structure of the Volkswagen group. The *GUO* of this group is the German firm Porsche SE which is primarily owned by the German families Porsche and Piëch. The principal subsidiary of Porsche SE is Volkswagen AG (based in Germany). This firm, in turn, holds Audi AG (based in Germany), which is the owner of Automobili Lamborghini Holding S.p.A. (based in Italy), which is the owner of the Ducati Motor Holding S.p.A (based in Italy). With *ORBIS*, I am able to identify the home country of the *GUO* of Ducati Motor Holding S.p.A. which is Germany. This enables me to explore the effect of a change in the German DTR_t on dividend payments of firms owned by German firms. In the example above, this means identifying changes in the repatriation of profits from Ducati Motor Holding S.p.A. to Automobili Lamborghini Holding S.p.A., from Automobili Lamborghini Holding S.p.A. to Audi AG, from Audi AG to Volkswagen AG and from Volkswagen AG to Porsche SE, as well as payouts of the Porsche SE to the Porsche and Piëch families.

Hence, I am going to use the investor-level dividend income tax rates in the country of the *GUO* (DTR_{kt}) as an explanatory variable for dividend payouts of the firms. See section 3.1 for more details.

The analysis includes firms from the manufacturing sector¹⁰ which report unconsolidated statements and plausible figures.¹¹ Firms which I observe in less than three consecutive years are dropped.¹² Furthermore, I only include

⁹Recall that the abbreviation *GUO* refers to the global ultimate owner.

¹⁰Therewith, I exclude the following type of firms: Banks, financial companies, foundation and research institutes, insurance companies, funds, public authorities, and venture capital firms. These firms are excluded because of regulatory differences (as in, e.g., Duchin and Sosyura, 2013).

¹¹I drop firms if the balance sheets report negative stocks of assets or negative values for cash or turnover. Note that I also conduct estimations where I trim or winsorize the data in the robustness checks (Section 7).

¹²Note that only observations from 2007 will end up in the estimations since I need one observation in $t - 1$ to calculate DIV_{it} . Furthermore, the Lintner model includes one lag of DIV_{it} . Hence, I need at least three consecutive observations of a firm to include it

firms for which it is possible to calculate dividend payments. As a result, I end up with 2,133,251 firm-year observations in 67 countries with *GUOs* in 130 countries between the years 2006 and 2014. Each firm appears on average 7.7 times in the dataset. I observe a *GUO* for 92.1% of the firms, 21.8% of these *GUOs* reside in a foreign country (foreign from the perspective of the firm that is owned by the *GUO*).

5.3 Summary statistics

Figure 2 plots the average DIV_{it} , and Figure 3 the DTR_{jt} in panel (a) and the average DTR_{kt} ¹³ in panel (b) for each country. The average dividend payment equals USD 3.34 million. I find the largest average DIV_{it} in South America and Asia where I also find high $DTR_{s_{jt}}$. On average, the DIV_{it} in Europe is somewhat smaller while the $DTR_{s_{jt}}$ is slightly larger. Interestingly, these conclusions do not change if we look at panel (b) where the differences between the DTR_{it} and the country average of the DTR_{kt} also are minimal.

— Figure 2 about here —

— Figure 3 about here —

While *prima facie*, one could expect this to be driven by a large number of firms having a *GUO* in the same country, the difference in the tax rates remains tiny if I only consider firms with foreign *GUOs*. The difference is only slightly larger (0.2 vs. 1.2 percentage points). Similarly, I find almost the same average tax rates in the countries of the *GUOs* and in the countries of the firms they own (25.3% and 25.5%). If I look at how DTR_{jt} , DTR_{kt} , and DIV_{it} correlate, I find a value of 0.8 for the correlation of DTR_{jt} and DTR_{kt} while it is almost zero for DIV_{it} and the two tax rates. The same is true if I consider the correlation of the tax differential between the countries of the firm and the *GUO* (i.e., $DTR_{jt} - DTR_{kt}$), and DIV_{it} . Interestingly,

 successfully in the empirical estimations.

¹³Assume two firms are located in country A. Further assume, the DTR_t in the two countries of the firms' *GUOs* are equal to 0.2 and 0.3, respectively. Therewith, I assign $DTR_{kt} = 0.25$ to country A.

there is also no significant correlation between DIV_{it} and the GDP of the countries.

Hence, these first findings do not suggest that changes in dividend payments are associated with changes in income taxes.

Among all firms, I observe zero dividend payments for 41.64% of the firms. I do not find evidence in favor of larger or smaller firms (in terms of assets, profits or turnover) paying zero dividends.

Figure 4 provides a scatterplot of the Lintner variables DIV_{it} , DIV_{it-1} , and PL_{it} (profits and losses), as well as a linear fit of the data. Many firms pay only relatively small dividends. However, I also observe firms with large payments. I find strong graphical evidence in favor of the Lintner model, higher values of PL_{it} or DIV_{it-1} are associated with higher DIV_{it} . Note that for some firms I observe large dividend payments and profits. The results in the econometric analysis are robust to winsorizing (e.g., at the 1st and 99th percentile) or to trimming the data, however.

— Figure 4 about here —

5.4 Further control data

Some publications in the literature identify no need to include further control variables into the Lintner model (see, e.g., Fama, 1974). Nevertheless, in some specifications, I will include further country and firm-specific control variables to check for the robustness of the estimations and also to be consistent with other studies on this topic. Like Bellak and Leibrecht (2010) or Brown et al. (2007), I control for lagged firm debt ($DEBT_{it}$), GDP growth in the country of the firm (GDP_{jt}^g) and of the GUO (GDP_{kt}^g), as well as firm size (following, e.g., Benito and Young, 2003; Bond et al., 2007). While I use the debt indicator from the *ORBIS* dataset, I take GDP growth rates from the Worldbank's World Development Indicators. For the size of the firms, I use turnover ($TURN_{it}$) from *ORBIS* following the argument above (in an international context, this is the most comparable measure available).

Due to the high computational requirements of the Baltagi-Li estimator, I only use a smaller subsample where I keep firms with a total of assets worth

at minimum USD 1 million.¹⁴ I provide evidence that the estimates are not sensitive to this restriction of the sample.¹⁵

Summary statistics are provided in Table 1 for the full sample and in Table 2 for the sample which only includes firms with at least USD 1 million in assets.

— Table 1 about here —

— Table 2 about here —

6 Results

In this chapter, I present the results of the econometric analysis. I start with the discussion of the results of the pure basic model. Then, I move on to the effect of the DTR_{kt} and further control variables on the dividend payments where I also use semiparametric techniques.

6.1 The Lintner model

Column (1) in Table 3 presents the results of the basic Lintner model based on Equation (7), using the full sample and unscaled variables. I find highly significant and positive coefficients for DIV_{it-1} and PL_{it} . Using Equation (8), I may calculate the smoothing parameter s and the desired payout ratio r , as defined in Equation (1). The results suggest that firms exhibit moderate preferences in favor of a smooth dividend payment stream ($s = 0.7243$)¹⁶ which suggests that firms are somewhat reluctant to change the dividend payment in response to a change in profits. Furthermore, I estimate the desired long-run payout ratio to be equal to 33.1%. Next, I report the results for firms with at least USD 1 million in assets and firm-specific variables

¹⁴Note that I already use the bwHPC high performance computing cluster provided by Baden-Württemberg's ministry of science to carry out the estimations.

¹⁵To be more specific, I estimate the standard Lintner model by means of OLS using the restricted and the unrestricted sample. The results are virtually identical.

¹⁶Recall that larger smoothing parameters imply smaller preferences for dividend smoothing.

scaled by turnover (as discussed in section 5.2). As can be seen in Column (2), excluding the small firms does not lead to significant changes in the results. If I use the scaled variables (3) and add aggregate year effects (4), I find somewhat larger smoothing parameters and smaller desired payout ratios. Adding firm fixed effects (5), however, generates results which are again more similar to the results in (1) and (2). I will refer to (5) as the preferred specification since the firm and aggregate year effects, as well as the scaling of the variables, have been used in the literature in a very similar way.

— Table 3 about here —

As already discussed above, Bellak and Leibrecht (2010) provide an overview of the estimated Lintner parameters in the literature. For dividend payments, the speed of adjustment coefficient ranges from 0.16 to 0.77; the desired payout ratio is estimated to be between 0.23 and 0.88. The estimates of (1) and (2) are within that range. I find somewhat larger smoothing parameters and smaller desired payout ratios in (3) and (4). In the preferred estimation (5), the smoothing parameter is just slightly larger.

However, the results discussed so far do not only suggest that the data fits the Lintner model very well, but I also find reasonable results for the intercept which is either significant and positive or insignificant (firms reduce dividends only reluctantly to avoid clashing with shareholders) but not negative, as predicted by the Lintner model. A significant negative coefficient would have called my approach into question since it would have suggested that firms only reluctantly *increase* dividends, which is very unlikely. Overall, I conclude that the results strongly support the econometric approach I have chosen and provide a sensible foundation to investigate the effect of the DTR_{kt} on dividend payments, which I discuss in the next part.

6.2 Dividend payments and taxes

Table 4 presents the results of the specifications where I additionally include the DTR_{kt} and further control variables. I start by adding the DTR_{kt} to

the preferred Lintner specification, with and without aggregate year fixed effects. Furthermore, I add the additional control variables as discussed in 5.4. The results are presented in columns (1) - (3). Adding the DTR_{kt} keeps the Lintner parameters completely unchanged, adding the additional controls gives only rise to slight adjustments. I find a significant negative effect of firm debt, all other additional variables, as well as the intercept, are insignificant.

— Table 4 about here —

However, the fact that the DTR_{kt} remains highly insignificant in all three specifications¹⁷ is the most important finding. This result serves as a further piece of evidence that firms do not base their dividend payment decisions on investor-level income taxes.

As discussed above, it is ex-ante unclear if the parametric functional form I impose on the DTR_{kt} is valid. Therefore, I repeat the econometric analysis above where I estimate the effect of the DTR_{kt} nonparametrically using the Baltagi-Li estimator, as discussed in section 4 (I report the results in columns (4) - (6)). The first thing I note is that the smoothing parameter decreases a bit while the desired payout ratio is virtually unchanged. Therewith, both parameters are fully in line with previous results in the literature. Adding aggregated time shocks and additional control variables only changes these results fractionally. I present the nonparametric results of the estimate of the DTR_{kt} in Figure 5 panel (a). What we see is that, again, the effect of the DTR_{kt} is very small over the whole range. Furthermore, the effects are much smaller compared to the (insignificant) estimates in the parametric specification for each value of the DTR_{kt} . Nevertheless, I find positive effects for very small values which is puzzling.

While the similarity of these results with the parametric ones suggests that the semiparametric findings of the tax rates also might be highly insignificant, I would need to estimate the standard deviations of the estimated parameters in order to come up with a more reliable statement. Since this

¹⁷Apart from being insignificant, the size of the estimated coefficient might be surprising, however, note that a tax rate of 20% is coded as 0.2 in the data and not as 20.

is not even computationally feasible for the subsample with the firms with at least USD 1 million in assets, I repeat the estimation using firms with at least USD 5 million in assets. Subsequently, I plot the nonparametric estimate as well as the 95% confidence interval in Figure 5, panel (b). The results indicate the tax effect not to be significantly different from zero over the whole range. Hence, I still may conclude that the DTR_{kt} does not play a significant role in the decision of intra-firm dividend payments at any level of the tax rate.

— Figure 5 about here —

7 Robustness checks

This chapter covers the robustness checks I have conducted in order to examine the sensitivity of the results. Some first evidence has already been presented in section 6.1 where I show the results for the specifications with unscaled variables, and the full sample including small firms.

In a next step, I consider the approach taken by Bellak and Leibrecht (2010) who set dividend payments equal to zero where they observe zero profits or losses. The results can be found in column (1) in Table 5 (which also covers the other specifications I discuss in this section henceforth in columns (2) - (7)). I find similar results in terms of the Lintner parameters and the DTR_{kt} , the latter still being insignificant. In a further step, I additionally exclude firms where dividend payments exceed profits. The tax coefficient remains insignificant; the smoothing parameter s decreases somewhat.

For the next four specifications, I do not find any changes in the Lintner parameters compared to (1). In (3), I use the investor-level dividend tax rate in the country where the subsidiary resides (DTR_{jt}), in (4), I include the DTR_{kt} as well as the DTR_{jt} . All tax coefficients remain insignificant. Hence, I do not find any evidence that multinational firms base their dividend payments on investor-level tax rates in the country of the firms. In some countries, there are possibilities for investors to retain dividend earnings for reinvestment such that the capital income is finally taxed at the capital gain

tax rate ($CGTR_{kt}$). Using the $CGTR_{kt}$ ¹⁸, which I also take from Eklund and Wamser (2019), I still do not find a significant effect of the tax (as reported in column (5)), the same is true if I use the $CGTR_{jk}$ (6). Since the data includes firms with *GUOs* in the same country, as well as in a different country, I also test a specification where I include an interaction term of the DTR_{kt} with an indicator which is one if the subsidiary and the *GUO* are in different countries (column (7)). Also here, I do not find any significant effects of the dividend income tax rate. These findings underline that firms not only leave dividend payments unchanged but also repatriate profits from foreign firms they own in the same way as they did before taxes changed.

Furthermore, note that the results are robust to winsorizing (e.g., at the 1st and 99th percentile) or to trimming the data. The same is true if firms like financial companies that were omitted in the main estimations due to regulatory differences (see chapter 5.2 for more details) are included in the analysis. Similarly, the results are robust if only firms from the European Union are considered and if firms from the US are included additionally.

— Table 5 about here —

8 Conclusion

This study evaluates the effect of investor-level dividend income taxes on dividend payments of firms. While firms might change dividend payments to investors in response to a tax change, I do also take into account that this change in dividend payments might lead to adjustments of the repatriation of profits from other firms which the firm owns. I base my analysis on the Lintner model of dividend payouts. In a first step, I show that consistently with the literature dividend payments result as a combination between the desired payout ratio and dividend payments in the period before, since firms aim at providing with a smooth dividend payment stream. In a next step, I add different control variables and the dividend tax rate. While I deploy full parametric models, I also allow for heterogeneous effects of the tax using the

¹⁸I.e. the $CGTR_t$ in the country of the *GUO*.

semiparametric Baltagi-Li estimator. In a third step, I present the results of various robustness checks including alternative specifications and subsamples of the data.

All results consistently show that dividend income taxes on the level of investors do not have a significant impact on dividend payments of firms, neither on payments to investors nor on intra-MNF profit repatriations. This finding is robust if I use the tax rate of the subsidiary instead of the parent company. The same is true for the capital gains tax rate.

Furthermore, this study contributes to the literature by producing evidence that the Lintner model provides sensible results in a setting that includes large numbers of countries and firms that belong to MNF networks.

These findings have important implications for public policies. Most countries levy considerably smaller taxes on investor-level capital income compared to earned income. While there are various reasons for this difference, some countries do so because of fears that higher taxes might induce capital flights. The results of this study provide evidence that the cost of increasing the dividend income tax might be smaller than initially assumed.

However, this study also has some important limitations. While I observe the location of the mother company, I do not observe the country of residence of the most influential investors, i.e., I assume that they reside in the same country as the mother company within an MNF network. However, if these investors are taxed in different countries, firms might adjust their dividend payments according to some weighted average of the tax rate of the different countries. However, since studies (e.g., French and Poterba, 1991) have shown that there is an investment home bias (i.e., investors tend to invest disproportionately in the home market), the tax rate in the country of the firm could still serve as an instrument for the weighted average tax rate. Furthermore, the characteristics of investors could lead to a slight deviation from the standard tax rate in some countries. Hence, this research could be extended by including information on the influential shareholders themselves which would improve the precision of the approach taken.

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Appendix

A Tables

Table 1: Summary statistics

Variable	Mean	Std. Dev.	Min.	Max.	N
DIV_{it}	3,339.727	84,086.601	0	26,331,272	2,133,251
PL_{it}	2,029.107	72,806.443	-15,138,905	23,924,918	2,133,251
DIV_{it}^S	2.955	424.655	0	367,105	2,133,251
PL_{it}^S	0.001	725.478	-772,246	591,289	2,133,251
$DEBT_t^S$	1.245	119.814	0	82,881.5	2,133,251
$TURN_t$	45,467.48	693,194.858	1	245,497,386	2,133,251
GDP_{jt}^g	0.529	3.401	-14.814	15.316	2,133,251
GDP_{kt}^g	0.499	3.306	-62.076	104.487	2,133,251
DTR_{kt}	0.253	0.135	0	0.6	2,133,251

Notes: This table presents descriptive statistics for the variables used in the econometric analysis and is based on the full sample. A detailed description of the variables is provided in section 5. Balance sheet data is denoted in USD 1,000.

Table 2: Summary statistics (Assets \geq USD 1 million)

Variable	Mean	Std. Dev.	Min.	Max.	N
DIV_{it}	4,140.721	93,789.361	0	26,331,272	1,714,019
PL_{it}	2,519.341	81,216.115	-15138,905	23,924,918	1,714,019
DIV_{it}^S	3.587	471.842	0	367,105	1,714,019
PL_{it}^S	0.014	809.168	-772,246	591,289	1,714,019
$DEBT_{it}^S$	1.51	133.757	0	82,881.5	1,701,646
$TURN_{it}$	56,226.377	772,955.198	1	245,497,386	1,714,019
GDP_{jt}^g	0.515	3.285	-14.814	15.316	1,704,144
GDP_{kt}^g	0.479	3.183	-62.076	104.487	1,695,362
DTR_{kt}	0.266	0.136	0	0.6	1,714,019

Notes: This table presents descriptive statistics for the variables used in the econometric analysis and is based on the restricted sample including only firms with assets \geq USD 1 million. A detailed description of the variables is provided in section 5. Balance sheet data is denoted in USD 1,000.

Table 3: Lintner model

Variable	(1)	(2)	(3)	(4)	(5)
<i>Full sample</i>					
DIV_{it-1}	0.276*** (0.001)				
PL_{it}	0.240*** (0.001)				
<i>Assets > USD 1 million</i>					
DIV_{it-1}		0.276*** (0.001)			
PL_{it}		0.240*** (0.000)			
DIV_{it-1}^S			0.089*** (0.000)	0.089*** (0.000)	0.219*** (0.000)
PL_{it}^S			0.103*** (0.000)	0.103*** (0.000)	0.353*** (0.000)
<i>Constant</i>	4,437.115*** (120.444)	2,463.934*** (65.409)	2.768*** (0.258)	1.029 (1.029)	1.279 (1.101)
<i>Obs.</i>	2,133,251	1,714,019	1,696,560	1,696,560	1,345,052
<i>Adj. R²</i>	0.168	0.168	0.061	0.061	0.164
<i>Lintner parameters:</i>					
s (Eq. (8))	0.724	0.724	0.911	0.911	0.781
r (Eq. (8))	0.331	0.331	0.114	0.114	0.452
Year FE	No	No	No	Yes	Yes
Firm FE	No	No	No	No	Yes

Notes: This table presents the results of the standard Lintner model as described in section 3.2. (1) is based on the full sample and original variables. (2) - (5) are based on a sample which includes firms with assets \geq USD 1 million only. Variables, which are scaled by TURN, are used in (3) (as indicated by the superscript *S*). In (4) and (5) year and firm fixed effects are added successively. Standard errors in parenthesis. Where firm fixed effects are included, I follow Anderson and Hsiao (1982) in instrumenting DIV_{it-1} by DIV_{it-2} . * $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$.

Table 4: Effect of DTR_{kt} on DIV_{it}

Variable	(1)	(2)	(3)	(4)	(5)	(6)
<i>Assets > USD 1 million</i>						
DIV_{it-1}^S	0.219*** (0.001)	0.219*** (0.001)	0.233*** (0.001)	0.305*** (0.001)	0.305*** (0.001)	0.304*** (0.001)
PL_{it}^S	0.353*** (0.000)	0.353*** (0.000)	0.356*** (0.000)	0.327*** (0.000)	0.327*** (0.000)	0.327*** (0.000)
DTR_{kt}	9.137 (6.125)	5.838 (6.562)	5.207 (6.878)	<i>Nonparametric results: Figure 5</i>		
$DEBT_{it-1}^S$			-0.074*** (0.002)			
$TURN_{it}$			0.000 (0.000)			0.000 (0.000)
GDP_{jt}^g			-0.054 (0.155)			0.008 (0.185)
GDP_{kt}^g			0.062 (0.160)			-0.002 (0.183)
Constant	-0.569 (1.639)	-0.279 (2.068)	0.023 (2.215)			
Obs.	1,345,052	1,345,052	1,318,900	998,293	998,293	979,731
Adj. R^2	0.168	0.164	0.168	0.395	0.395	0.397
<i>Lintner parameters:</i>						
s (Eq. (8))	0.781	0.781	0.767	0.696	0.696	0.696
r (Eq. (8))	0.452	0.452	0.464	0.470	0.470	0.470
Year FE	No	Yes	Yes	No	Yes	Yes
Firm FE	Yes	Yes	Yes	Yes	Yes	Yes

Notes: This table presents the results of the tax augmented Lintner model as described in section 3.3. Several specifications use the semiparametric Baltagi-Li estimator following section 4.2. All specifications are based on a sample which includes firms with assets \geq USD 1 million only. (1) provides the same specification as Table 3 where I include the variable DTR_{kt} . (2) adds year effects, (3) also includes firm and country-specific control variables. (4) - (6) repeat the analysis in (1) - (3). However, the DTR_{kt} is estimated nonparametrically using the Baltagi-Li estimator. Standard errors in parenthesis. Where firm fixed effects are included, I follow Anderson and Hsiao (1982) in instrumenting DIV_{it-1} by DIV_{it-2} .

* $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$.

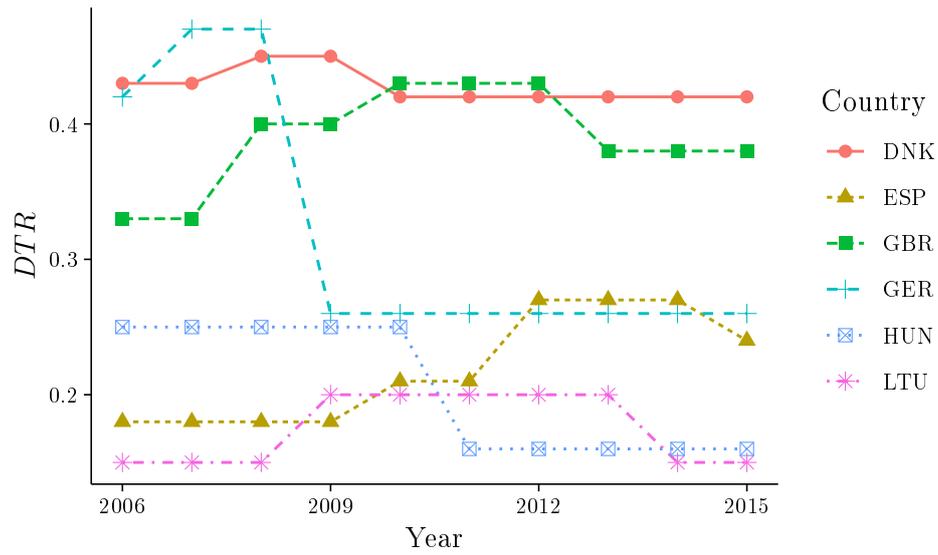
Table 5: Robustness checks

Variable	(1)	(2)	(3)	(4)	(5)	(6)	(7)
DIV_{it-1}^S	0.203*** (0.001)	0.264*** (0.001)	0.203*** (0.001)	0.203*** (0.001)	0.203*** (0.001)	0.203*** (0.001)	0.203*** (0.001)
PLS_{it}	0.346*** (0.000)						
DTR_{kt}	3.811 (5.727)	9.203 (6.308)		1.656 (10.391)			6.989 (6.109)
$CGTR_{kt}$			3.906 (5.643)		-4.899 (3.463)		
$CGTR_{jt}$						0.742 (3.209)	
DTR_{kt} x <i>foreign</i>							-23.558 (15.761)
$DEBTS_{it-1}^S$	-0.024*** (0.002)	-0.028*** (0.002)	-0.024*** (0.002)	-0.024*** (0.002)	-0.024*** (0.002)	-0.024*** (0.002)	-0.024*** (0.002)
$TURN_{it}$	-0.000 (0.000)						
GDP_{jt}^g	-0.019 (0.1325)	0.026 (0.141)	-0.009 (0.134)	-0.012 (0.136)	-0.033 (0.132)	-0.023 (0.133)	-0.001 (0.133)
GDP_{kt}^g	0.004 (0.1368)	0.015 (0.146)	-0.006 (0.136)	-0.002 (0.138)	-0.012 (0.136)	-0.009 (0.136)	-0.004 (0.137)
<i>Constant</i>	0.241 (1.7936)	-1.588 (2.019)	0.219 (1.771)	0.139 (1.840)	2.329* (1.207)	1.102 (1.155)	0.753 (1.826)
<i>Obs.</i>	1,633,138	1,222,135	1,633,131	1,633,131	1,633,138	1,633,131	1,633,138
<i>Adj. R²</i>	0.166	0.254	0.166	0.166	0.166	0.166	0.166
Year FE	Yes						
Firm FE	Yes						

Notes: This table presents various robustness checks and is based on a sample which includes firms with assets \geq USD 1 million only. In (1) I set $DIV_{it} = 0$ where $PL_{it} \leq 0$ as in Bellak and Leibrecht (2010), (2) additionally excludes firms where dividends exceed profits, (3) uses the DTR_{kt} in the country of the firm instead of the GUO while (4) uses both tax measures, (5) uses the $CGTR_{kt}$ in the country of the GUO , (6) controls for the $CGTR_{kt}$ in the country of the firm instead of the country of the GUO , (7) includes again the DTR_{kt} , interacted with a dummy which indicates if the GUO resides in a foreign country. Standard errors in parenthesis. I follow Anderson and Hsiao (1982) in instrumenting DIV_{it-1} by DIV_{it-2} . * $p < 0.10$, ** $p < 0.05$, *** $p < 0.01$.

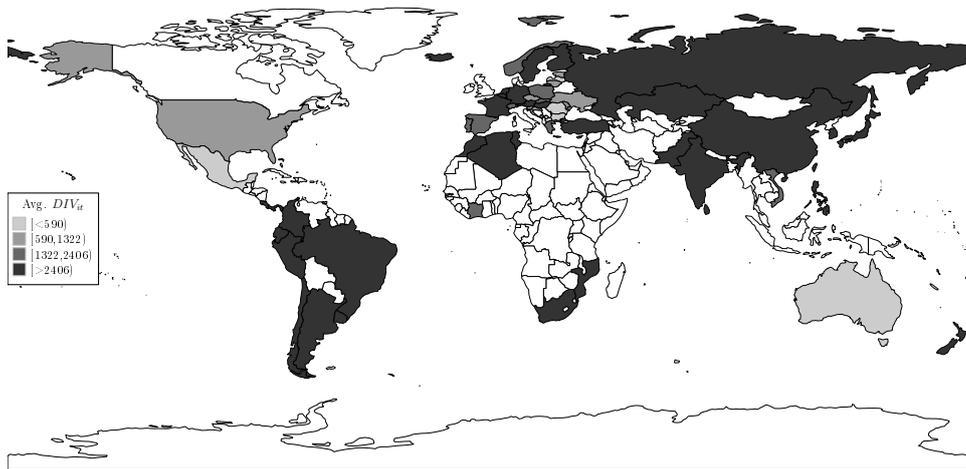
B Figures

Figure 1: Variation of DTR_{kt} by country



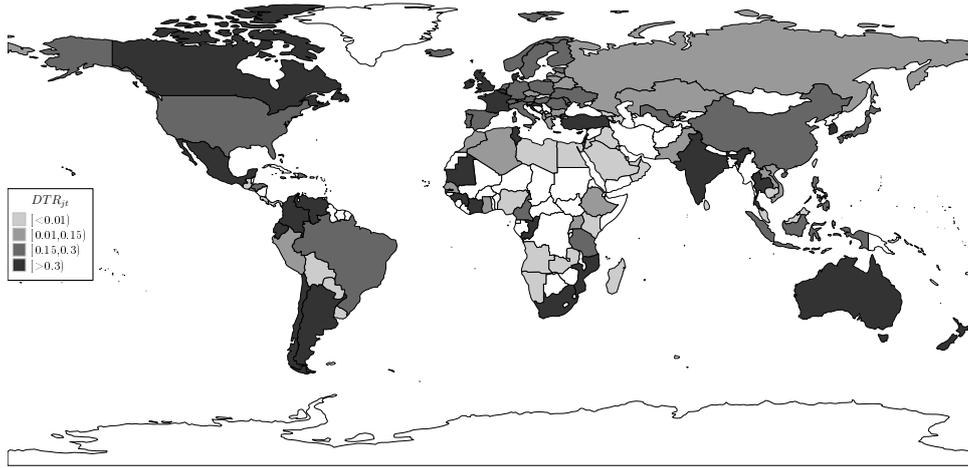
Notes: This figure provides the times series of the DTR_{kt} of a selection of countries: Denmark (DNK), Spain (ESP), the UK (GBR), Germany (GER), Hungary (HUN), and Lithuania (LTU).

Figure 2: Average DIV_{it}

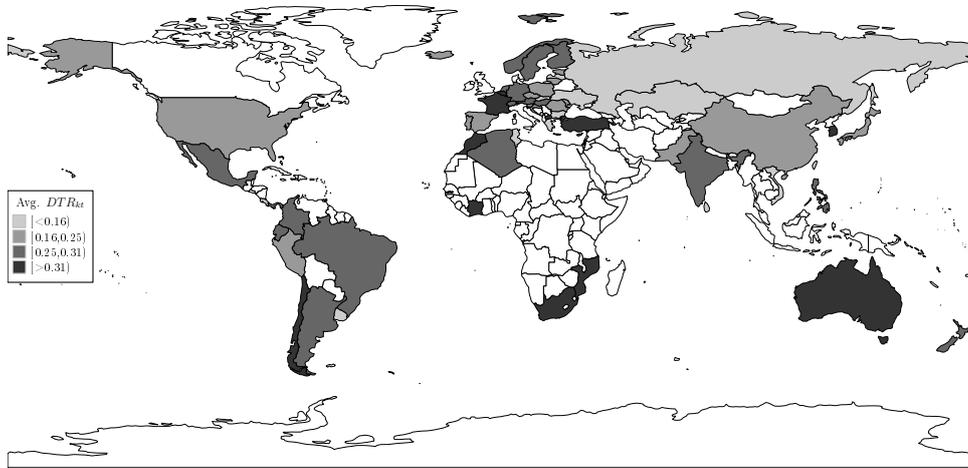


Notes: This figure provides the country average of the DIV_{it} . The tax rate is categorized into four quartiles.

Figure 3: DTR_{jt} and average DTR_{kt}



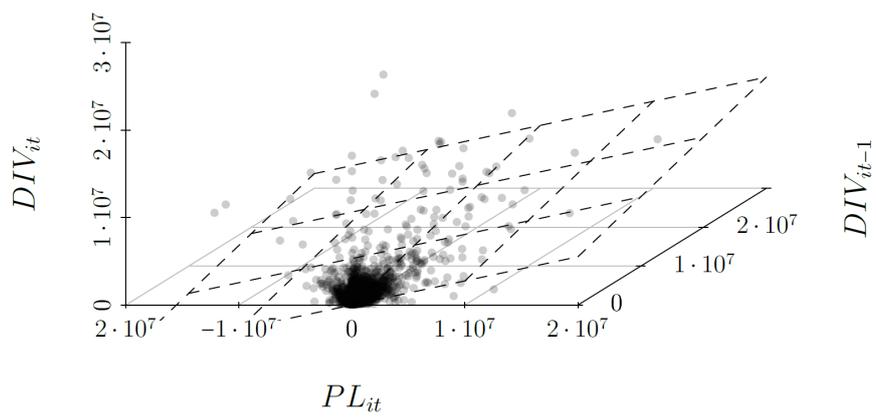
(a) DTR_{jt}



(b) Average DTR_{kt}

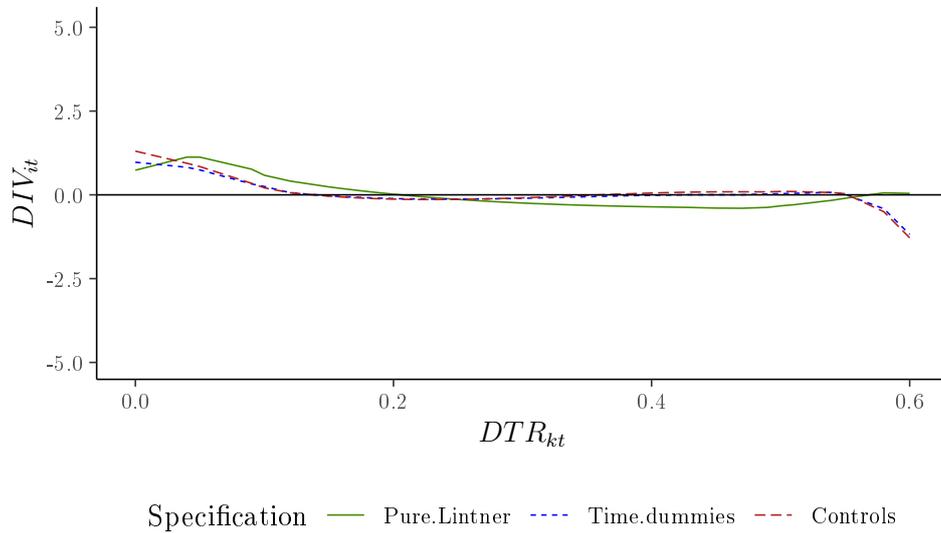
Notes: This figure provides the country averages of (a) the DTR_{jt} and (b) the DTR_{kt} . The tax rates are categorized into four quartiles. DTR_{jt} denotes the DTR in country j of firm i , DTR_{kt} the DTR in the country k of the GUO of firm i .

Figure 4: Correlation Lintner variables

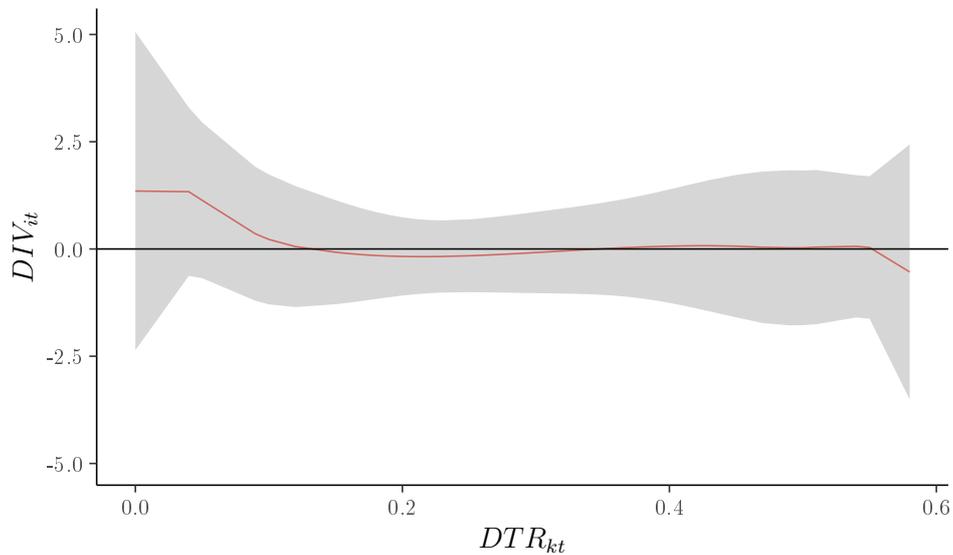


Notes: This figure provides a scatterplot of the Lintner variables (DIV_{it} , DIV_{it-1} , PL_{it}) and a linear fit.

Figure 5: Nonparametric results DTR_{kt}



(a) All specifications



(b) With 95% CI

Notes: This figure provides in (a) the nonparametric results of the DTR_{kt} from the estimations presented in Table 4, columns (4) - (6). In (b) I also present the 95% confidence interval. Due to computational restrictions, this estimation is based on a restricted sample including only firms with assets \geq USD 5 million.

C Nonparametric estimation

The function $g(z_t)$ is approximated by a series $p^k(z_t)$, the estimation is carried out through a B-spline series. Intuitively, using regression splines amounts to splitting the data into bins where each bin is fitted individually by a polynomial function. Therefore, each bin can be fitted by a simpler polynomial instead of using a complex polynomial over the whole range which might explain the data poorly and could suffer from Runge's phenomenon.¹⁹ To ensure that this procedure results in a smooth piecewise polynomial function, the different polynomials have to meet properly at each border of each bin (called knots). In formal terms, the function itself and the first $m - 1$ derivatives have to meet continuously at each knot.

For illustrative reasons, a spline series of degree m with k knots $c_1 < c_2 < \dots < c_k$ can be represented using a power series:

$$S(z_t) = \sum_{j=0}^m \zeta_j z_t^j + \sum_{j=1}^k \lambda_j (z_t - c_j)_+^m \text{ with } (z_t - c_j)_+^m = \begin{cases} (z_t - c_j)^m & \text{if } z_t > c_j \\ 0 & \text{else.} \end{cases} \quad (13)$$

For example, if we set $m = 2$ and $k = 4$, evaluate the function at any value z_t with $c_2 \leq z_t \leq c_3$ and reorder, this results in

$$S(z_t) \Big|_{c_2 \leq z_t \leq c_3} = (\zeta_0 + \lambda_1 c_1^2 + \lambda_2 c_2^2) + (\zeta_1 - 2\lambda_1 c_1 - 2\lambda_2 c_2) z_t + (\zeta_2 - \lambda_1 - \lambda_2) z_t^2. \quad (14)$$

If we subsequently set $z_t = c_2$ and do the same for $S(z_t) \Big|_{c_1 \leq z_t \leq c_2}$, we would have that

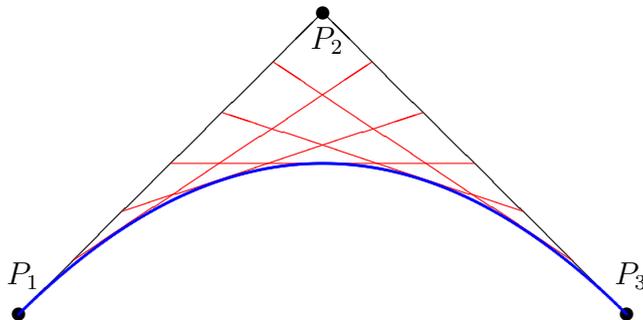
$$S(z_t) \Big|_{c_1 \leq z_t \leq c_2} = \zeta_0 + \lambda_1 c_1^2 + c_2(\zeta_1 - 2\lambda_1 c_1 + \zeta_2 c_2 + \lambda_1 c_2) = S(z_t) \Big|_{c_2 \leq z_t \leq c_3}, \quad (15)$$

¹⁹Runge's phenomenon describes the effect of potential low precision of an estimate which relies on a high-order polynomial. One reason is that for a high-order polynomial, the function may start to oscillate as the value of the derivatives increase.

which shows that the functions meet smoothly.

The same is true for the first derivative. Hence, the different polynomials meet continuously at the knots. Furthermore, note that three conditions are needed to identify a second order polynomial unambiguously. The first two conditions are given by the requirement that the first and second derivative have to join smoothly at c_1 . These conditions are determined by the parameters resulting from the former bins (here: the bin below c_1 and the bin between c_1 and c_2): $\zeta_0, \zeta_1, \zeta_2, \lambda_1$. Hence, there is precisely one free parameter left which may be determined by the data of the local bin: λ_2 . Therefore, at each bin, the parameters arise as a compromise between the local data and the surrounding polynomials.

While spline series estimation based on power functions is a very intuitive concept, especially to motivate how the different parts meet continuously at the knots, it might suffer from computational issues. The polynomials might become almost collinear if bins are too small. Furthermore, small bins can lead to overflow errors in the numerical estimation procedure. This problem may be solved if B-spline bases are chosen instead of truncated polynomials. First, it is important to note that B-splines are more flexible since they can represent any spline series using linear combinations. In effect, B-splines can be thought of as a rescaling of the piecewise functions. B-splines are based on Bézier curves. Essentially, Bézier curves are built from a series of control points which are weighted by Bernstein polynomials. The following drawing shows how three control points P_1, P_2 and P_3 define a quadratic Bézier curve (The thick curve connecting P_1 and P_3):



Intuitively, these Bézier curves are then put together to construct the

B-spline series. Technically, the Cox-de Boor recursion formula is used to combine the Bézier curves. For more details, the interested reader is referred to Boor (1972), M. J. D. Powell (1981) or Boor (2001).