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Knowledge Group: Accounting

Research Domains: Tax & Legal

Teaching Domains: International Taxation, Transfer Pricing, Financial Statement Analysis, Risk Assessment & Management

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Articles in Scholarly Journals

The New Tax Treatment of Capital Gains Arising from the Indirect Sale of Italian Real Estate Held by Non-Residents

PASSI, C., A. RIZZO, "The New Tax Treatment of Capital Gains Arising from the Indirect Sale of Italian Real Estate Held by Non-Residents", *European Taxation*, 2024, vol. 64, no. 2/3

Intellectual Property and Tax Incentives: A comparative analysis of the EU and the US legal frameworks

RIZZO, A., "Intellectual Property and Tax Incentives: A comparative analysis of the EU and the US legal frameworks", *Virginia Tax Review*, 2023, vol. 43, no. 2, pp. 291-329

La prospettiva italiana sulla global minimum tax approvata dal Consiglio UE

GARBARINO, C., A. RIZZO, "La prospettiva italiana sulla global minimum tax approvata dal Consiglio UE", *Fiscalità & Commercio Internazionale*, 2023, no. 2, pp. 5-9

Il Country-by-Country Reporting in ambito UE

GARBARINO, C., A. RIZZO, "Il Country-by-Country Reporting in ambito UE", *Fiscalità & Commercio Internazionale*, 2022, vol. 8-9, pp. 5-10

The OECD Global Minimum Tax Proposal under Pillar Two: Will It Achieve the Desired Policy Objective?

DAS, P., A. RIZZO, "The OECD Global Minimum Tax Proposal under Pillar Two: Will It Achieve the Desired Policy Objective?", *Bulletin for International Taxation*, 2022, vol. 76, no. 1, pp. 44-52

Verso una progressiva riduzione delle soglie dimensionali di accesso all'adempimento collaborativo? Evoluzioni e criticità

GARBARINO, C., A. RIZZO, "Verso una progressiva riduzione delle soglie dimensionali di accesso all'adempimento collaborativo? Evoluzioni e criticità", *Fiscalità & Commercio Internazionale*, 2022, vol. 6, pp. 5-10

Brexit e disapplicazione della giurisprudenza della Corte di Giustizia dell'Unione Europea

GARBARINO, C., A. RIZZO, "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)

GARBARINO, C., A. RIZZO, "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

The attribution of profits to a dependent agent permanent establishment: the controversial scenario of the zero profit allocation

RIZZO, A., A. ORLANDI, M. C. LATINO, "The attribution of profits to a dependent agent permanent establishment: the controversial scenario of the zero profit allocation", *International Transfer Pricing Journal*, 2021, vol. 28, no. 2

The Interplay between FAR Analysis and AOA in a Digitalized Economy

ORLANDI, A., R. IERVOLINO, A. RIZZO, "The Interplay between FAR Analysis and AOA in a Digitalized Economy", *International Transfer Pricing Journal*, 2021, vol. 32, no. 1

The OECD unified approach: understanding the real deal for market countries

DAS, P., A. RIZZO, "The OECD unified approach: understanding the real deal for market countries", *International Tax Studies*, 2021, vol. 4, no. 5, pp. 2-8

Imposte sui redditi degli intermediari finanziari non residenti operanti in Italia

SPITALERI, A., A. RIZZO, "Imposte sui redditi degli intermediari finanziari non residenti operanti in Italia", *Novità Fiscali*, 2020, vol. 5, pp. 267-272

Is the post-lockdown a good timing for introducing an environmental tax?

RIZZO, A., E. SCUDERI, "Is the post-lockdown a good timing for introducing an environmental tax?", *Fiscalità & Commercio Internazionale*, 2020, vol. 10, pp. 88-89

The Role of Corporate Residence in Tax Matters and its Relationship with the Provision of Dividend Relief: A Comparative Analysis between the UK and the US Tax Systems

RIZZO, A., "The Role of Corporate Residence in Tax Matters and its Relationship with the Provision of Dividend Relief: A Comparative Analysis between the UK and the US Tax Systems", *International Journal of Accounting and Taxation*, 2019, vol. 7, no. 1, pp. 35-39

Unione Europea e Svizzera: la tassazione della plusvalenza latente

GARBARINO, C., A. RIZZO, "Unione Europea e Svizzera: la tassazione della plusvalenza latente", *Fiscalità & Commercio Internazionale*, 2019, vol. 11, pp. 42-46

Contribution to Chapters, Books or Research Monographs

Effective tax rates and the minimum rate

RIZZO, A., P. DAS, "Effective tax rates and the minimum rate" in Pillar Two of the Inclusive Framework on BEPS. A Problem-solving Approach., C. Garbarino (Ed.), Edward Elgar Publishing, chap. 4, pp. 166-193, 2024

A Case for Environmental Taxation as a Response to the COVID-19 Economic Crisis

SCUDERI, E., A. RIZZO, A. LOUCAIDOU, "A Case for Environmental Taxation as a Response to the COVID-19 Economic Crisis" in Tax Law in Times of Crisis and Recovery., Dominic de Cogan, Alexis Brassey, Peter Harris (Eds.), Bloomsbury Publishing, chap. 13, 2023

L'uscita del Regno Unito dall'Unione Europea: i rapporti fiscali internazionali

GARBARINO, C., A. RIZZO, "L'uscita del Regno Unito dall'Unione Europea: i rapporti fiscali internazionali" in Brexit: scenari fiscali e opportunità per i professionisti italiani., Piazza Marco, Favalaro Gianmaria (Eds.), Wolters Kluwer Italia, pp. 1-37, 2020

La normativa fiscale del Regno Unito: cenni

RIZZO, A., "La normativa fiscale del Regno Unito: cenni" in Brexit: scenari fiscali e opportunità per i professionisti italiani., Piazza Marco, Favalaro Gianmaria (Eds.), Wolters Kluwer Italia, pp. 173-175, 2020

Working Papers

AI Risk Management in Tax Audits: A Comparative Review of the EU and US Regulatory Approaches

RIZZO, A., G. HASSAN - "AI Risk Management in Tax Audits: A Comparative Review of the EU and US Regulatory Approaches" - 2024, TTLF Working Papers, Stanford-Vienna Transatlantic Technology Law Forum, no. 124

The Role of Tax Incentives for Innovation in Pharma, Biotech, and MedTech: A Comparative Study Between the EU and US Regulatory Approaches

RIZZO, A. - "The Role of Tax Incentives for Innovation in Pharma, Biotech, and MedTech: A Comparative Study Between the EU and US Regulatory Approaches" - 2024, TTLF Working Papers, Stanford-Vienna Transatlantic Technology Law Forum, no. 123

Intellectual Property and Tax Incentives: A comparative analysis of the EU and the US legal frameworks

RIZZO, A. - "Intellectual Property and Tax Incentives: A comparative analysis of the EU and the US legal frameworks" - 2023, TTLF Working Papers, Stanford-Vienna Transatlantic Technology Law Forum, no. 101

Other

The EU Foreign Subsidies Regulation: a Structural Change to the Internal Market

RIZZO, A., "The EU Foreign Subsidies Regulation: a Structural Change to the Internal Market", Transatlantic Antitrust and IPR Developments. Stanford-Vienna Transatlantic Technology Law Forum, 2023, no. 1, pp. 6-9

Research Notes or short Articles in Journals

How will the Italian Digital Services Tax affect the trade relations with the U.S. and China?

DAI, Y., A. RIZZO, "How will the Italian Digital Services Tax affect the trade relations with the U.S. and China?", *Fiscalità & Commercio Internazionale*, 2020, vol. 7, pp. 97-98