(QQUS) Arbeitskreis Quantitative Steuerlehre Quantitative Research in Taxation – Discussion Papers

Jens Müller, Arndt Weinrich

Tax Knowledge Diffusion via Strategic Alliances

arqus Discussion Paper No. 253

February 2020 revised May & August 2020 & August 2021

> www.arqus.info ISSN 1861-8944

Tax Knowledge Diffusion via Strategic Alliances

August 2021

Jens Müller

Paderborn University

jens.mueller@upb.de*

Paderborn University

Arndt Weinrich

arndt.weinrich@upb.de**

We thank Harald Amberger, Peter Brok (discussant), Alissa Brühne (discussant), Paul Demeré, Alex Edwards, Beatriz García-Osma, Joachim Gassen, Jochen Hundsdoerfer, Martin Jacob, Alastair Lawrence, Maximilian Müller (discussant), Harun Rashid (discussant), Leslie Robinson, Christina Ruiz (discussant), Harm Schütt, Christoph Sextroh, and Jake Thornock for their helpful comments. We also thank the workshop- and conference-participants at the 2019 annual meeting of the foundation Stiftung Prof. Dr. oec. Westerfelhaus, the 2019 arqus Conference, the 5th Berlin-Vallendar Conference on Tax Research, the 6th Annual MaTax Conference, the 2020 Hawaii Accounting Research Conference, the 2020 ATA Midyear Meeting in Fort Worth, the 82nd VHB Annual Business Researcher Conference 2020, the Humboldt University of Berlin, the TRR 266 Mini Conference on Taxation 2021, and at the 2021 EAA Annual Congress. We further acknowledge the helpful discussions with our colleagues at the Department of Taxation, Accounting and Finance at Paderborn University. This work was supported by the Stiftung Prof. Dr. oec. Westerfelhaus (Project ID P02) and the Deutsche Forschungsgemeinschaft (DFG, German Research Foundation, Project ID 403041268, TRR 266 Accounting for Transparency).

*Jens Müller, Paderborn University, Faculty of Business Administration and Economics, Department of Taxation, Accounting and Finance, Warburger Str. 100, 33098 Paderborn, Germany.

**Send correspondence to Arndt Weinrich (orcid.org/0000-0002-3983-0269), Paderborn University, Faculty of Business Administration and Economics, Department of Taxation, Accounting and Finance, Warburger Str. 100, 33098 Paderborn, Germany.

Tax Knowledge Diffusion via Strategic Alliances

August 2021

Abstract

We utilize the characteristics of tax knowledge, knowledge diffusion processes, and strategic alliances' institutionalization to examine whether strategic alliances serve as channels for tax knowledge diffusion between firms. We empirically identify tax knowledge diffusion via strategic alliances by documenting economically meaningful decreases in cash effective tax rates of high-tax firms in strategic alliances with low-tax firms relative to high-tax firms in strategic alliances with other high-tax firms. We identify dynamic treatment effects and find that elapsed time is an important facilitating mechanism of tax knowledge diffusion. Furthermore, we show that geographical proximity, identical industry affiliation, and shared audit firm serve as substitutes rather than as complements for strategic alliances to low-tax firms. Finally, we triangulate our findings to effects on the textual sentiment of 10-K filings and the disclosure of tax haven operations. Overall, our results provide robust evidence for tax knowledge diffusion via strategic alliances.

Keywords: Corporate Tax Planning/Avoidance, Knowledge Diffusion, Network, Strategic Alliance

JEL Qualification: C31, G34, H26

Data Availability: Public and/or subscription-based sources identified in the paper

Online Supplement: https://github.com/taxknowledge/diffusionviastrategicalliances

Declarations of Interest: The authors declare that they have no conflicts of interest

1. Introduction

Do strategic alliances serve as channels for tax knowledge diffusion? In the form of contractual-based cooperation between firms, strategic alliances are expected to foster their main business purposes and to facilitate the respective diffusion of knowledge between the partners. For instance, Li et al. [2019] identify significant increases in firms' innovative capacity when investing in R&D strategic alliances. Clearly, the main business purpose of a strategic alliance is different from tax knowledge. Rather, firms pool their resources to achieve strategic objectives. Our analyses, however, document substantial decreases in the cash effective tax rates of high-tax firms in strategic alliances with low-tax firms relative to high-tax firms in strategic alliances with high-tax firms. Based on the applied research design and the theoretical framework, we conclude to identify tax knowledge diffusion via strategic alliances. This carries two important implications. Firstly, our results indicate that firms not only create and explore anticipated synergies but also gain knowledge that is unrelated to the main business purpose of a strategic alliance. Thus, a firm's management should, when trading off the inherent tension between value creation and value protection (Palomeras and Wehrheim [2021], Sampson [2007]), incorporate tax knowledge diffusion into their management frameworks for strategic alliances. Secondly, investments in strategic alliances should not mechanically impact a firm's available options and incentives for tax planning. The identification of tax knowledge diffusion via strategic alliances thus builds on theory which highlights the behavioral aspects of tax planning processes. Our study documents the outcome of this process and shows that a strategic alliance establishes a cross-firm connection through which firms benefit from their partners' tax knowledge and change their tax planning behavior.

Specifically, we provide and test a theoretical framework of tax knowledge diffusion via strategic alliances that does not depend on the assumption of an intentional transfer of tax knowledge via an intermediary (e.g., see client-bank-client relationships in Gallemore et al. [2019]). Within this framework, tax knowledge diffusion comprises gaining access to and being willing and capable of employing relevant tax knowledge (see also Rogers [2003]). Therefore, we consider tax knowledge diffusion as an inadvertent outcome.

Consequently, the characteristics of tax knowledge impact its diffusion because the more tax knowledge qualifies as explicit, the more easily diffusible it should be (Meier [2011], Bresman et al. [2010]). While explicit knowledge can easily be codified and is systematically diffusible, tacit knowledge is difficult to formulate and communicate because it "is deeply rooted in action, commitment, and involvement in a specific context" (Nonaka [1994]). The substantial complexity of corporate taxes (Hoppe et al. [2021]), the increased uncertainty (Dyreng et al. [2019], Guenther et al. [2017]) and the costs (Hundsdoerfer and Jacob [2019]) of tax planning emphasize the tacit elements of tax knowledge. Tax knowledge may also comprise know-how that is more tacit than pure information (Kale et al. [2000]). However, observing that tax planning strategies often serve as mass-market tax-saving ideas and are not limited to a particular industry (e.g., see Lisowsky [2010]) highlights the explicit elements of tax knowledge. The inferences on corporate-owned life insurance shelters (Brown [2011]) or lease-in, lease-out transactions (Wilson [2009]) support this notion. We contend that tax knowledge is characterized by both explicit and tacit elements that facilitate and impede tax knowledge diffusion.

The institutional characteristics of strategic alliances enlarge this tension. Strategic alliances, which we also refer to as "networks", are not only a relevant (PwC [2018]) but also a unique choice of institutionalization (Lindsey [2008], Chan et al. [1997]). Mutual commitment exceeds that of simple market transactions but falls short of complete integration (Boone and Ivanov [2012], Yin and Shanley [2008]). In particular, strategic alliances are not subject to corporate income taxation because they do not establish a separate legal entity. Consequently, the diffusion of tax knowledge is particularly valuable outside the scope of a network. Earning such private benefits, however, harms the strive for the network's common benefits (Khanna et al. [1998]) and could further affect the bargaining power between the partners. The instability of networks, however, can be associated with shifts in partners' bargaining power (Inkpen and Beamish [1997], Khanna et al. [1998]). Additionally, uncertainty is inherent to both cooperation (Chen et al. [2015]) and tax planning (Dyreng et al. [2019]). This requires management to evaluate the marginal disutility of uncertainty. These examples reiterate how important behavioral aspects are when analyzing tax knowledge diffusion. In this

regard, a benefit of tax knowledge diffusion could be to better be able to assess the costs and benefits of certain tax planning strategies when observing strategies effectively implemented by partners. If this caused a firm's management willingness to also implement the respective tax planning activity, tax knowledge diffusion could overcome the fear of reputational costs from engaging in tax planning (Gallemore et al. [2014], Hanlon and Slemrod [2009], Graham et al. [2014], Austin and Wilson [2017]).

The absence of corporate income taxation at the level of a strategic alliance is useful for our analysis since we are interested in whether strategic alliances serve as channels for tax knowledge diffusion between firms and not in whether investments lead to mechanical tax effects. This translates into our identification strategy: we empirically measure tax knowledge by observing the outcome of a firm's nonconforming tax planning behavior. We exploit information on strategic alliances that were established between publicly traded US firms from 1994 to 2016. Given that accounting data are available for a network's partners, we reshape the data from the alliance to the partners' levels (network-firm observations). We classify the partners in a network as low-tax and high-tax firms depending on their industry-year-mean adjusted multiperiod cash effective tax rates in the run-up to the initiation of a network. To tease out tax knowledge diffusion, we analyze changes in the tax planning behavior of high-tax firms in strategic alliances with high-tax firms.

Our main analysis robustly documents a substantial decrease in cash effective tax rates of high-tax firms in strategic alliances with low-tax firms (hightolow = 1) relative to high-tax firms in strategic alliances with high-tax firms (hightolow = 0). Our results are also economically meaningful because our analyses suggest reasonable cash effective tax rate levels for high-tax firms in low-tax networks of 25.57%. This translates into a difference in differences in our tax knowledge proxy of 4.3 percentage points in univariate tests. We corroborate this finding by multivariable regression analyses in which we control, based on textual analysis, for the networks' business purposes and partner characteristics. Furthermore, we apply a difference in differences regression design with the employment of entropy balancing weights under the

exclusion of overlapping events. Our results are consistent throughout these tests and additional robustness checks.

Next, we turn to the potentially facilitating mechanisms of tax knowledge diffusion. Our theoretical framework suggests that knowledge diffusion is a gradual, multistage process. We contend that elapsed time increases the likelihood of tax knowledge diffusion and find consistent evidence. Our results suggest that high-tax firms on average are able to significantly decrease their cash effective tax rates two years after a network's initiation. We also investigate whether characteristics of the partnering firms' environments, i.e., geographical proximity and shared industry affiliation, intensify or mitigate the identified effects. Our findings indicate that these characteristics serve as a substitute rather than as a complement for strategic alliances to low-tax firms. We find corresponding results when testing for an alternative channel by interacting *hightolow* with *SameAuditor*, an indicator variable for partnering firms with a shared audit firm.

Finally, we investigate whether tax knowledge diffusion can be associated with tax related changes in the disclosure behavior of firms. In particular, we investigate the textual sentiment of 10-K filings and exhibit 21 disclosures of subsidiaries in tax havens. We find a negative response of textual sentiment of 10-K filings to low-tax networks in comparison to high-tax networks for high-tax firms. This finding is consistent with prior research indicating increased tax planning when observing decreasing textual sentiment of 10-K filings (Law and Mills [2015]). Our findings, however, do not suggest that the identified decreases in textual sentiment are accompanied by increases in firms' financial constraints. Furthermore, we show that the identified effects from our analyses seem on average not to stem from increases in the reported operations in international tax havens or the State of Delaware. This indicates that firms use existing, yet not fully exploited, structures for tax planning.

Our study builds on research that examines whether firms benefit from the knowledge that they gain in strategic alliances (Boone and Ivanov [2012], Mohanram and Nanda [1996], Chen et al. [2015], Anand and Khanna [2000], Baxamusa et al. [2018], Chan et al. [1997], Porrini [2004], Cai and Sevilir [2012], Higgins

5

and Rodriguez [2006], Ishii and Xuan [2014], Gomes-Casseres et al. [2006], Li et al. [2019]). The findings frequently highlight the knowledge related benefits of investments in strategic alliances but focus on knowledge in the context of the networks' main business purposes. Consistently, existing research on knowledge protection in strategic alliances suggests that firms especially attempt to safeguard from knowledge leakage with respect to the main business purpose of the network (Palomeras and Wehrheim [2021], Li et al. [2008]). Notably, protection against tax knowledge diffusion is aggravated because tax knowledge comes with little to no legal protection, as there is, for instance, for intellectual property (for the general implications of weak knowledge protection, see Zhao [2006]). Furthermore, the characteristics of tax knowledge because not all corporate practices diffuse in the same way (Cai et al. 2014). To the best of our knowledge, we are the first to measure knowledge diffusion via a contractual cooperative organizational form (i.e., strategic alliances) based on a firm's tax planning behavior.

We also contribute to the emerging accounting literature that identifies cross-firm connections to determine increases in the tax planning behavior of firms. With the focus on close relationships via intermediaries and intentional transfers of tax knowledge, board ties (Brown [2011], Brown and Drake [2014]), banks (Gallemore et al. [2019]), human capital turnover (Barrios and Gallemore [2021]), and auditors (Frey [2018], Lim et al. [2018]) are analyzed. In contrast, strategic alliances are established on a peer-to-peer basis without an intermediary. In this regard, recent work on peer-to-peer relationships by Cenet al. [2017], [2020] is related to our study. The authors document that tax planning spreads from principal customers to their dependent suppliers. Their findings suggest that customers and dependent suppliers intentionally share tax planning benefits through lower product prices. Thus, the identification of intentional tax knowledge transfers aligns their work with research on intermediaries. Our study generally builds on a different theoretical framework because our focus is on the inadvertent diffusion of tax knowledge. For instance, many facets of tacit tax knowledge characteristics (e.g. reevaluating tax planning strategies) are inherent to the diffusion process. Investigating the substantially diverse relationships in strategic alliances further

distinguishes our study from Cen et al. [2017], [2020]. In particular, strategic alliances' business purposes cover both horizontal and vertical value chain localizations. We gain insights into these business purposes by applying textual analysis of the networks' descriptions and we control for the respective *network controls* throughout our analyses. Finally, we contend that elapsed time after a network's initiation should be a relevant facilitator of knowledge diffusion (Bresman et al. [2010]), and our dataset allows for a precise identification of a network's initiation.

2. Theoretical Framework & Prior Literature

The extensive research that considers within-firm determinants of tax planning by firms underlines the perceived importance of corporate taxes in economic theory, politics and society (for comprehensive reviews, see Hanlon and Heitzman [2010] and Wilde and Wilson [2018]). Given the substantial economic impact of tax planning activities (Clausing [2016], Tørsløv et al. [2018], Blouin and Robinson [2020]), tax advisors are intuitively linked to observations of tax planning. However, recent analyses of "tax planning ecosystem[s]" (Dyreng and Maydew [2017]) suggest that cross-firm connections impact tax planning. We review the literature on these channels to embed strategic alliances into the theoretical framework of tax knowledge diffusion in the following.

2.1 CROSS-FIRM CONNECTIONS & TAX KNOWLEDGE

2.1.1 Prior Research on Intentional Transfers of Tax Knowledge

Brown [2011] examines the spread of a specific tax planning tool, the corporate-owned life insurance shelter, and finds that board interlocks increase the probability that a firm adopts the tax shelter from a prior user. Consistently, Brown and Drake [2014] suggest that firms with greater board ties to low-tax firms increase tax planning themselves. Further disentangling the role of intermediaries, Barrios and Gallemore [2021] document that firms exhibit increasing tax planning when they hire tax staff from sophisticated tax planners. Gallemore et al. [2019] show that firms experience meaningful tax reductions when they start a relationship with a bank whose existing clients engage in tax planning. Additionally, studies focus on whether auditors impact firms' tax planning behavior (Aobdia [2015], Cai et al. [2016], Dhaliwal et al.

[2016], McGuire et al. [2012], Klassen et al. [2016]) but provide mixed inferences. Calibrations from the audit firm level to the individual audit engagement partner (Lim et al. [2018], Frey [2018], Bianchi et al. [2018]) leave this question open. In recent work, Nesbitt et al. [2020] suggest that there are limits to the relation between auditor-provided tax services and clients' tax aggressiveness.

These studies are conceptually aligned by the presence of intermediaries who implement tax planning expertise in their set of contracts and intentionally transfer the tax knowledge to other parties with whom they are contracting. Consistently, intermediaries are found to play a key role in the acquisition and dissemination of information in many research fields (e.g., see Di Maggio et al. [2019]). In contrast, strategic alliances are based peer-to-peer without an intermediary. Cen et al. [2017], [2020] perform peer-to-peer analyses and investigate transfers of tax knowledge along supply chains. They document that both customers and suppliers increase their tax planning activities once their relationship is considered dependent. The evidence suggests that customers and suppliers share tax planning benefits through lower product prices. Although evidence for the intended sharing of tax benefits is scarce (for instance, see Erickson [1998] and Erickson and Wang [1999]) and supply chains could incentivize firms to pass along inaccurate information (Bushee et al. [2020]), the identification of an intentional transfer of tax knowledge aligns the supply chain channel with research on intermediaries.

2.1.2 The Diffusion of (Tax) Knowledge

Knowledge diffusion requires communication through channels over time among members of a social system (Rogers [2003]). This definition suggests that, in addition to knowledge access, a firm must also deploy an approach to utilize the knowledge. Otherwise, knowledge diffusion cannot contribute to a firm's knowledge profile (Kale et al. [2009], Mazloomi Khamseh et al. [2017]). From this, we deduce that tax knowledge diffusion conceptually comprises gaining access to and being willing and capable of employing relevant tax knowledge.

Within this theoretical framework, there are several aspects that speak in favor of tax knowledge diffusion via strategic alliances. Generally, strategic alliances force firms to commit investment and other support to

common goals (Yin and Shanley [2008]). Consistently, cooperation is found to mitigate cultural differences between partners (Kogut and Singh [1988]). Furthermore, Kale et al. [2009] argue that firms should create a dedicated management structure to oversee and support their alliance activities. For instance, observing effectively implemented tax planning strategies by partners may not only reveal unknown tax knowledge but also increase a firm's management willingness to implement the respective tax planning activity. Moreover, it may provide a better assessment of the costs and benefits of certain tax planning strategies. Mulligan and Oats [2016] note that "sharing information, particularly about tax plans and technical advice about dealing with ambiguities in tax laws serves to provide legitimacy to preferred tax positions, yielding a form of power [...] when taking tax positions in dealing with Revenue Authorities." Furthermore, tax knowledge diffusion could overcome the fear of costs from engaging in tax planning (Gallemore et al. [2014], Hanlon and Slemrod [2009], Graham et al. [2014], Austin and Wilson [2017]). Finally, existing research on knowledge protection in strategic alliances suggests that firms especially attempt to safeguard from knowledge leakage with respect to the main business purpose of the network (Palomeras and Wehrheim [2021], Li et al. [2008]). Notably, protection against tax knowledge diffusion is aggravated because tax knowledge comes with little to no legal protection, as there is, for instance, for intellectual property (for the general implications of weak knowledge protection, see Zhao [2006]).

However, not all corporate practices diffuse in the same way (Cai et al. [2014]). Major barriers are knowledge-related factors, such as limits to a recipient's absorptive capacity (Szulanski [1996], Dyer and Hatch [2006]). Additionally, constraints on knowledge diffusion increase returns to having a sophisticated knowledge profile (Akcigit and Ates [2019]). Furthermore, tax knowledge diffusion is especially valuable outside the scope of a network. Earning private benefits, however, raise tension between partners by impacting firms' strive for common benefits (Khanna et al. [1998]). Additionally, tax knowledge diffusion could lead to shifts in bargaining power between the partners because a partner with sophisticated (non-sophisticated) tax knowledge potentially gains bargaining power in the run-up to a (established) strategic alliance when identifying possible (earning the private benefit of) tax knowledge diffusion. However, the

instability of networks can be associated with shifts in the partners' bargaining power (Inkpen and Beamish [1997], Khanna et al. [1998]). Furthermore, Desai et al. [2004] suggest that shared ownership of equity joint ventures could impact the fine-tuning of tax planning of these entities. Corporate culture and governance further impact a firm's behavior with regard to implementing tax planning strategies (Klassen et al. [2017], Armstrong et al. [2015]). Additionally, both cooperation (Chen et al. [2015]) and tax planning (Dyreng et al. [2019]) are found to induce uncertainty. Even prudent managers could expect the marginal disutility of uncertainty to exceed the benefits of received tax knowledge. Consequently, it remains an empirical question whether strategic alliances actually serve as channels for tax knowledge diffusion.

2.2 FACILITATORS

If one observed that strategic alliances served as channels for tax knowledge diffusion, documenting the facilitating mechanisms would allow for a better understanding of the underlying process. Prior research discusses a multitude of facilitators, of which "elapsed time" is generally highlighted as most important. This assessment theoretically builds upon knowledge diffusion being a gradual, multistage process (Inkpen [2000], Szulanski [1996], Bresman et al. [2010]). Consequently, elapsed time is suggested to increase the probability of uniformity of actions in networks (Gale and Kariv [2003], Isaksson et al. [2016]).

[Figure 1]

The black box model in Figure 1 aligns our conceptual framework with potentially relevant facilitators. Network characteristics themselves might facilitate or impede knowledge diffusion. Kepler [2019] and Palomeras and Wehrheim [2021] suggest that the ability to share more and a broader range of information increases with the number of partners in an alliance and its breadth of scope (see also Acemoglu et al. [2011] and Blonski [1999]). However, the mere quantity of networks does not translate to relational capabilities needed for building and managing alliances (Kale et al. [2009]). Facilitators could also emerge from firms' organizational structures and their environments (Fiol and Lyles [1985], Yin and Shanley [2008]). For instance, interfirm interactions could be reinforced with decreasing geographical distance between firms, as hypothesized by Brown [2011]. Potential effects of shared industry affiliation could be

moderated by competition (i.e., industry concentration). Generally, industry concentration may promote collusive behavior (Bourveau et al. [2020]). However, Cai and Szeidl [2018] find that competition reduces diffusion rates of business-relevant information. Furthermore, competition could diminish the effects of technological overlap (Bena and Li [2014], Palomeras and Wehrheim [2021]). Initially, "technological relatedness" could also speak as to with whom firms form an strategic alliance (Diestre and Rajagopalan [2012]). Research on knowledge diffusion also suggests an impact for a multitude of soft factors. Prominent examples are communication (Bresman et al. [2010], Bushee et al. [2020]), partner trustworthiness (Jiang et al. [2016]), commitment (Bushee et al. [2020]), managerial flexibility (Chen et al. [2015], Chan et al. [1997]), partnering mindset (Kale et al. [2009]), and learning intent (Hamel [1991], Mazloomi Khamseh et al. [2017]). Frank et al. [2021] focus on knowledge in the relationship between third-party insurers and audit firms and present interview evidence that "…one-on-one consultations tend to be most effective because they can make the necessary reductions in tacitness, ambiguity, and complexity of knowledge during the process…" (p. 38).

3. Data & Methodology

[Figure 2]

3.1 SAMPLE SELECTION

We exploit data on strategic alliances from Refinitiv's SDC Platinum (SDC) database on strategic alliances over the 1994-2016 period. SDC is widely used in relevant research on corporate cooperation (Anand and Khanna [2000], Boone and Ivanov [2012], Cai and Sevilir [2012], Chen et al. [2015], Ishii and Xuan [2014], Li et al. [2019]) and tracks a very wide range of agreement types (Schilling [2009]). SDC issues data at the strategic alliance level. Initially, we exclude equity joint ventures from the data. This deflates our sample to observations which are flagged as strategic alliances by SDC. We then reshape data from the alliance to the partner level (network-firm observation) because strategic alliances are not subject to corporate taxation but the (publicly traded) contracting partners are. A strategic alliance between two partners, for instance, translates to one network-firm observation for each of the two partners. Compustat provides firm-year-level

accounting information, and we merge SDC and Compustat data by using a firm's six-digit CUSIP number (at the level of the ultimate parent of the participant) as an identifier. Although SDC provides reliable network observations from the beginning of 1990 onwards, we start in 1994 consistent with many tax studies. We end our sample in 2016 to exclude any influences from the 2017 US tax reform. Furthermore, we consider strategic alliances between publicly traded firms incorporated and headquartered in the US and in which all contracting parties are identified in Compustat data (Figure 2).

3.2 IDENTIFICATION STRATEGY

3.2.1 Measuring Tax Knowledge

We proxy for tax knowledge by measuring a firm's nonconforming tax planning. The lingua franca in determining the degree to which a firm succeeds in this attempt is the effective tax rate, which puts tax expenses and pre-tax book income into perspective. We base our inferences on the cash effective tax rate (*cash ETR*) because *cash ETR* also captures tax deferral strategies (Hanlon and Heitzman [2010], Edwards et al. [2016]). Furthermore, we apply a multiperiod (3-year) form of *cash ETR* (Brown and Drake [2014], Barrios and Gallemore [2021], Gallemore et al. [2019]) because we expect the likelihood of tax knowledge diffusion to increase with elapsed time:

$$cash \ ETR3_{i,t=1} = \frac{\sum_{t=1}^{3} (txpd_{i,t})}{\sum_{t=1}^{3} (pi_{i,t} - spi_{i,t})}$$
(1)

The terms txpd, pi and spi correspond to their Compustat data item equivalents of cash taxes paid, pretax income and special items. Missing spi are reset to 0, while any cash ETR3 with a negative denominator is reset to missing. Nonmissing cash ETR3 are winsorized at 0 and 1. By the nature of this approach, cash ETR3 would always be missing for the final and penultimate firm-year of a firm in the panel. For these firm-years, we substitute cash ETR3 with cash ETR.¹ Applying a forward-looking multiperiod

¹ Example: given our sample period, cash ETR3 would always be missing for fiscal-year 2016. In this case, we construct the numerator and denominator over one year, respectively. In robustness checks we exclude firm-edge-

cash ETR3 has the advantage that potential tax knowledge diffusion via strategic alliances can be directly linked to the year of network initiation.

3.2.2 Focal Independent Variable: hightolow

For tax knowledge diffusion to occur, at least one of the network's partners must possess sophisticated tax knowledge (i.e., low-tax firm). Applying a forward-looking *cash ETR3* for our analysis has the advantage of aligning an influence on the *cash ETR3* directly with the year of network initiation. However, identifying low-tax firms based on a forward-looking measure would entail the disadvantage of concluding the type of input based on the output. For the identification of firms with sophisticated tax knowledge, we therefore consider *pre cash ETR3*, which is constructed over a three-year preceding period:

$$pre \ cash \ ETR3_{i,t=0} = \frac{\sum_{t=-2}^{0} (txpd_{i,t})}{\sum_{t=-2}^{0} (pi_{i,t} - spi_{i,t})}$$
(2)

For every t = 1 in which a new network is initiated, we consider the partners' initial *pre cash ETR3*, which spans from t = -2 to $t = 0.^2$ We must observe *cash ETR3* and *pre cash ETR3* of all partners for a network to be considered in our analysis. Figure 2 provides additional information regarding how we identify low-tax and high-tax observations. We classify firms based on their industry-year-mean adjusted *pre cash ETR3* [t_{-2} ; t_0] and allocate firm-year observations into four bins according to the quartiles of the distribution. Industry adjustment (Brown and Drake [2014]) and a multiperiod measure (Dyreng et al. [2008], Dyreng et al. [2017]) help us to validate the identification of sophisticated tax planners. In t = 1 (network initiation), a partner is treated as a low-tax firm in a network when its adjusted *pre cash ETR3* [t_{-2} ; t_0] is in the first bin (i.e., lowest quartile). Conversely, firms that do not qualify as

years from our sample to ensure that variation in *cash ETR3* does not stem from this substitution (Table OS 7 Panel A).

² We also refer to *cash ETR*3 and *pre cash ETR*3 as *cash ETR*3 $[t_1;t_3]$ and *pre cash ETR* $[t_{-2};t_0]$ to highlight the respective timing around a network initiation.

low-tax firms are classified as high-tax firms.³ Consequently, any strategic alliance in our sample may be composed of low-tax firms only, high-tax firms only, or a combination of high-tax and low-tax firms. In our analyses, we focus on high-tax firms and discriminate between high-tax firms that invest in strategic alliances with low-tax firms (*hightolow* = 1) and high-tax firms that invest in strategic alliances with other high-tax firms (*hightolow* = 0):

$$hightolow_{i,t} = \begin{cases} 1, & high-tax firm in network to low-tax firm(s) \\ 0, & high-tax firm in network to high-tax firm(s) \end{cases}$$
(3)

The high-tax firms are in very similar situations except for potentially experiencing tax knowledge diffusion. Consequently, mechanical effects, if any, from investments in strategic alliances on our tax planning measure would affect both groups of *hightolow* similarly. Therefore, high-tax firms establish the treatment group and the control group for our analyses. The numbers of observations per group equal one observation per high-tax firm in a strategic alliance (network-firm observation) because we collapse the data based on the multiperiod-measured variables for the main analyses. Our identification strategy leads us to 201 observations of *hightolow* = 1 and 627 observations of *hightolow* = 0.

The identification of our focal independent variable is completely agnostic about the root of a strategic alliance and respectively considers partners' tax knowledge.⁴ However, if high-tax firms anticipated beneficial diffusion of tax knowledge and unexceptionally selected low-tax firms as partners because of their sophisticated tax knowledge, endogenous treatment assignment would affect the inferences from OLS estimators (Lennox et al. [2012]). Clearly, any intention to gain tax knowledge via an investment in business cooperation must be a byproduct of other incentives. When investing in strategic alliances, firms pool their resources to achieve strategic objectives (e.g., R&D undertaking) (Meier et al. [2016]). Thus, it would be

³ In a robustness check, we show that our results are not sensitive to the classification of firms based on quartile-bins. We apply a modified identification strategy and enterhigh-tax and low-tax firms in a specification of equation (4) and regress *cash ETR3* on the firms' own *pre cash ETR3*, the industry-year-mean adjusted *partner pre cash ETR3*, and an interaction term of the two independent variables (Table OS 4).

⁴ This approach may be applied in various fields of research. For instance, Tan and Netessine [2019] use the catching title "When You Work with a Superman, Will You Also Fly?".

an economic pitfall if firms weighted the potential diffusion of tax knowledge over selection of a partner that best suits the network's main business purpose. Rather, firms could simply acquire tax planning strategies from tax advisors if this was the prioritized concern of a firm's management. Additionally, ex ante to the investment, a firm cannot publicly observe details of the partner's tax planning strategy even if it was aware of the tax planning outcome. This strongly increases the risk of a bet benefiting from tax knowledge diffusion. In contrast, our theoretical framework defines the process of tax knowledge diffusion as gaining access to and being willing and capable of employing relevant tax knowledge. In this regard, Baxamusa et al. [2018] emphasize that there is considerably less due diligence performed when investing in strategic alliances than when investing in M&As. Additionally, Owen and Yawson [2013] suggest that statutory tax rates are not negatively associated with investment decisions on strategic alliances in multicountry investigations. Finally, firms could be incentivized to become rather opaque about a network if its aim was to facilitate tax planning. These cases, however, are likely excluded from our sample since we require the identification of all partners in a network. These facts support our notion that strategic alliances are not intended to establish tax planning investments.

3.2.3 Information on Networks and Firms

[Figure 3]

Figure 3 maps networks and the investing firms from our sample.⁵ Each vertex (square) displays a firm in its classification as low-tax (black vertices) or high-tax (gray vertices). A link between two gray vertices translates into an observation of *hightolow* = 0 for both high-tax firms. Correspondingly, a link between a gray vertex and a black vertex translates into an observation of *hightolow* = 1 for the high-tax firm. It can be observed that there are firms with only one network observation in our sample (n = 324). In contrast, there are also firms with multiple investments in strategic alliances during our sample period (n = 178).

⁵ Networks of two partners may be displayed, respectively. However, the vast majority of networks in our sample combine two firms.

Interestingly, these prominent partners largely consist of high-tax firms. This indicates that firms do not strategically choose low-tax firms as partners in expectation of tax knowledge diffusion.

[Table 1]

Table 1, Panel A contains descriptive statistics with regard to firm-level accounting information (*firm controls*). Generally, we follow Dyreng et al. [2010] and measure *EBITDA3*, *RnDExp3*, *AdExp3*, *SGA3*, *CapEx3*, *GrowthSale3*, *Leverage3*, *Cash3*, *MNE3*, *NOL3*, *Intangibles3*, *PPE3*, and *Size3* as *firm controls*. Consistent with *cash ETR3*, *firm controls* are constructed over rolling three-year periods $[t_1; t_3]$. Conditioning on *hightolow*, we do not observe economically significant differences in the *firm controls* between the treatment group and the control group. This lends additional credibility to our control group choice.

Tax knowledge diffusion could be impacted by partners' organizational structures and their operational environments. Therefore, we collect information on *partner controls*. From Compustat data, we can infer whether network partners share the audit firm and/or industry affiliation in the year of network initiation (*SameAuditor & SameInd*) and whether their headquarters are located in the same region as defined by the Bureau of Economic Analysis (*SameBEARegion*).⁶ To increase the accuracy of our measures, we manually collect the geographical distance (as the crow flies) between the zip codes of the network partners' headquarters (*Proximity*) to control for the potential impact of geographical proximity in tax knowledge diffusion (Table 1, Panel B). We multiply the collected distances by minus one so that *Proximity* can be interpreted in accordance with the sign of the indicator variable *SameBEARegion* (as, for instance, in Brown [2011]).

⁶ The respective BEA regions are Far West, Great Lakes, Mideast, New England, Plains, Rocky Mountains, Southeast and Southwest.

[Figure 4]

Network characteristics might facilitate or impede tax knowledge diffusion, as business activities in a strategic alliance are generally not limited. SDC provides information on a network's activities with a deal description of every strategic alliance. We apply textual analysis on these deal descriptions to derive the main business purposes of the strategic alliances in our sample (*network controls*). The word cloud depicted in Figure 4 shows the 40 most common words used in the deal descriptions of our sample. We base regular expressions on selected features of the respective word frequencies (untabulated) and use pattern matching to identify *PurposeWholesale*, *PurposeRnD*, *PurposeLicensing*, *PurposeService*, *PurposeMarketing*, *PurposeSupply*, *PurposeTech*, and *PurposeManufacturing* as major network activities. Panel B of Table 1 shows the distribution of the respective indicator variables among the *hightolow* and *lowtohigh* observations. Furthermore, Panel C of Table 1 presents information on the industry affiliation of networks and firms. Industry affiliation is determined on clusters of two-digit SIC-codes. The majority of networks and investing firms operate in business services and manufacturing.

3.3 REGRESSION DESIGN

3.3.1 Baseline Model

Our main variable of interest *hightolow* is constructed as an indicator variable to distinguish between hightax firms that enter into high-tax networks (*hightolow* = 0) and high-tax firms that engage in low-tax networks (*hightolow* = 1). This approach ensures that we control for firms' seek to invest in strategic alliances. Consequently, *hightolow* isolates the incremental effect a low-tax network exerts on the hightax firm's tax knowledge. We estimate the following linear regression model by OLS:

$$cash ETR3_{i,t=1} = \beta_0 + \beta_1 hightolow_{i,t=1} + \sum_n \beta_n partner controls_{i,t=1}^n + \sum_l \beta_l network controls_{i,t=1}^l + \sum_k \beta_k firm controls_{i,t=1}^k$$

$$+ \delta_{ind} + \tau_t + \varepsilon_{i,t}$$

$$(4)$$

By using indicator notation (*hightolow*), the coefficient describes the effect of moving from one to another condition. We measure tax knowledge by cash ETR3, the two change-indicating variables delta cash ETR3, which is cash ETR3 $[t_1; t_3]$ scaled by pre cash ETR3 $[t_{-2}; t_0]$ minus one, and • $cash ETR3[t_1;t_3]$ change cash ETR3 which is the first difference estimator pre cash ETR3 $[t_{-2};t_0]$. A negative coefficient for hightolow would suggest that differences in the outcome level and in the change of high-tax firms' tax knowledge would be driven by the partners' tax knowledge. Our theoretical framework suggests that this would identify tax knowledge diffusion via strategic alliances. Because strategic alliances go beyond linking high-tax and low-tax firms, we include vectors of variables on partner controls (SameAuditor, Proximity) and network controls (PurposeWholesale, PurposeRnD, PurposeLicensing, PurposeService, PurposeMarketing, PurposeSupply, PurposeTech, PurposeManufacturing) in equation (4). Furthermore, we control for within-firm determinants of tax planning by including a vector of *firm controls*. We generally follow Dyreng et al. [2010] and consider EBITDA3, RnDExp3, AdExp3, SGA3, CapEx3, GrowthSale3, Leverage3, Cash3, MNE3, NOL3, Intangibles3, PPE3, and Size3. We include year (τ_t) and industry (δ_{ind}) fixed effects and cluster robust standard errors at the firm level (Petersen [2009]).

3.3.2 Difference in Differences (DiD)

The multiperiod variables in the specifications of equation (4) allow us to tie tax knowledge diffusion to the year of network initiation. An alternative approach for measuring tax knowledge diffusion is to maintain the panel structure of our data and apply a DiD design. In this model, *treatment* is generally in alignment with *hightolow*. Furthermore, we create an embargo period around a network observation during which a firm may not invest in another network (exclusion of overlapping events). Given a suggested average lifespan for strategic alliances of five years (Chan et al. [1997]), this embargo period contains the three

years preceding (post = 0) and five years subsequent (post = 1) to network initiation.⁷ We adjust *cash ETR* and *firm controls* from multiperiod measures to their single-year versions and continue to measure *partner controls* (*SameAuditor & Proximity*) and *network controls* at t = 1:

$$cash ETR_{i,t} = \beta_0 + \beta_1 treated_i + \beta_2 treated_i * post_t + \sum_n \beta_n partner controls_{i,t=1}^n + \sum_l \beta_l network controls_{i,t=1}^l (5) + \sum_k \beta_k firm controls_{i,t}^k + \gamma_{emb} + \tau_t + \delta_{ind} + \varepsilon_{i,t}$$

We include embargo period (γ_{emb}) fixed effects that subsume the *post* indicator (Gallemore et al. [2019]). Additionally, year (τ_t) fixed effects capture influences that affect tax planning behavior across all sample firms within a given year. We also include industry (δ_{ind}) fixed effects. In this model, *treated* measures the baseline difference in *cash ETR* that is not due to the presence of the treatment. The parameter of interest is the interaction *treated* * *post*, which measures the effect on *cash ETR* due to the treatment (i.e., low-tax network of high-tax firm).

Generally, the high-tax firms are in very similar situations except for potentially experiencing tax knowledge diffusion. However, if the characteristics of high-tax firms investing into low-tax networks differed from the characteristics of high-tax firms investing in high-tax networks, a concern about equation (5) would be that these differences drive the observed differences in *cash ETR*. In addition to excluding overlapping events, we also employ entropy-balancing weighting (Hainmueller [2012], Hainmueller and Xu [2013]) and use the entropy weights to re-estimate equation (5). Observations are balanced using continuous *firm controls* so that the variables' means and variances in the reweighted control group match the treatment group (balanced sample).

⁷ We use an expected lifespan of five years because SDC does not provide sufficient information on the termination of networks.

[Figure 5]

DiD specifications rely on the parallel trend assumption because one needs to empirically proxy for the posttreatment outcome absent the treatment. Accordingly, Panel A of Figure 5 provides visual documentation that the trends of *cash ETR* run both parallel and at comparable levels for treatment and control firms prior to the treatment. Furthermore, Patel and Seegert [2015] introduce an empirical approach to alleviate concerns about parallel trends. They suggest regressing the dependent variable on the treatment indicator, time fixed effects (i.e., embargo period (γ_{emb}) fixed effects which we base in the treatment year t_1) and the interaction of the treatment indicator and fixed effects. In Panel B of Figure 5, we therefore present the coefficient and the 95% confidence interval of the interaction of the treatment indicator and embargo period fixed effects for the pretreatment years. Additionally, we fail to reject that the coefficient estimates for the interaction terms for $\gamma_{emb} * treated$ are jointly zero in the pretreatment period (p-value 0.1741). These insights provide support for the parallel trend assumption.⁸

4. Results & Discussion

4.1 DESCRIPTIVE ANALYSIS

[Table 2]

We start our analyses by performing a descriptive analysis of the changes in the tax planning behavior of high-tax firms in strategic alliances with low-tax firms in comparison to high-tax firms in strategic alliances with high-tax firms. First, our focus is on *cash ETR3* $[t_1; t_3]$. We compare the before after changes from *pre cash ETR3* $[t_{-2}; t_0]$ to *cash ETR3* $[t_1; t_3]$ within the *hightolow* groups. We observe reductions in cash effective tax rates for both groups (Before After Change in Panel A of Table 2). While these decreases could comprise reversion to the mean, they would not explain differences in the development between the

⁸ In a robustness check, we implement an interaction weighted two way fixed effects estimator for *hightolow* under consideration of the recent advances by Sun and Abraham [2020] (Table OS 3). The result of this test generally supports our parallel trend assumption.

groups. Therefore, we test for the difference between groups and between periods (Difference in Differences). The respective difference of 4.3 percentage points is highly significant (p-value 0.0143).⁹ Observations of *hightolow* = 1 are accompanied by a mean *cash ETR3* [t_1 ; t_3] of 25.57%, and networks solely among high-tax firms (*hightolow* = 0) are aligned to an average *cash ETR3* [t_1 ; t_3] of 28.04%. We interpret these findings as a first indication of the existence of tax knowledge diffusion via strategic alliances. A potential concern, however, could be that the identification of differences in averages is induced by some increases in *cash ETR3* for high-tax firms in high-tax networks. Therefore, we test not only for the difference of the mean of *delta cash ETR3* (p-value 0.0422, Table 2 Panel B) but also for the difference of the median of *delta cash ETR3* (*change cash ETR3*). The results indicate negative and significant differences (p-values 0.0897 (0.0643)). We conjecture that our inferences are not biased from potential increases in *cash ETR3* in the control group.

4.2 REGRESSION RESULTS

[Table 3]

The main variable of interest in our regression analysis is *hightolow* because it isolates the incremental effect a low-tax network exerts on a high-tax firm's tax knowledge. In Panel A of Table 3, we show the results for estimating equation (4) with *cash ETR3* [t_1 ; t_3], *delta cash ETR3* and *change cash ETR3* as dependent variables. The estimates for *hightolow* are negative and significant in all specifications. In the specification with *cash ETR3* [t_1 ; t_3] as the dependent variable, the estimate for *hightolow* has a magnitude of -0.0278 (p-value 0.0488). Extending equation (4) to the change-indicating variables *delta cash ETR3* and *change cash ETR3* yields corresponding statistical implications (p-values 0.0137 and 0.0069). Economically, these results are consistent with our descriptive inferences in terms of direction and magnitude for both levels of and changes in tax planning behavior. Because the covariates of

 $^{^9}$ Equivalently, testing for the differences in means for the first difference estimator change cash ETR3 by hightolow yields corresponding results.

partner, network & *firm controls* account for a broad range of alternative explanations, we find it plausible to associate the (relative) increase in tax planning for high-tax firms in low-tax networks to be induced by the presence of a low-tax firm in the network.

For brevity and in support of refraining from discussing marginal effects of control variables (Hünermund and Louw [2020]), we generally focus the coefficient estimates for *hightolow* and *partner controls*. While the estimates for SameAuditor do not surpass the common levels of significance in either specification, the estimates for *Proximity* are consistently negative but only once statistically significant when change cash ETR3 is the dependent variable. In several additional analyses, we focus on interactions of *hightolow* and *partner controls* to investigate whether *partner controls* complement or substitute the identified effects. We do not observe that the business purposes of the strategic alliances (network controls) drive our findings. Solely the coefficients for PurposeRnD load negative and significant with *delta cash ETR3* and *change cash ETR3* as the dependent variables. We cautiously interpret the coefficients for the *network controls* to be consistent with research that shows that strategic alliances in R&D lead to higher patent output (Li et al. [2019]) and that patents have a causal effect on corporate tax planning that is incremental to the effect of R&D expenses on tax planning (Cheng et al. [2020]). If strategic alliances in R&D further allowed firms to employ specific tax credits, this effect would be unconditional to our classification of networks as of type *hightolow*. Generally, we conjecture that these results support our notion that strategic alliances are not intended to establish tax planning investments.

Next, we turn to our DiD analysis, which excludes overlapping events from the data. Panel B of Table 3 depicts two specifications of equation (5). In the second specification, entropy balancing weights are applied (balanced sample).¹⁰ The estimates for the interaction *treated* * *post* are negative and significant

¹⁰ Our results are robust to using alternative calculations (moments and timing) of the entropy weights (Table OS 6).

in both specifications. Consistent with our results for equation (4), we find a negative *cash ETR* response to low-tax networks in comparison to high-tax networks for high-tax firms.¹¹ Consequently, applying a DiD regression design not only corroborates our main findings but also hedges our conclusions from errors due to potential confounding, overlapping events or systematic differences between treatment and control groups. Taken together, the results from our descriptive and regression analyses convey that a firm's tax planning behavior is driven by the partner's tax planning behavior. Consequently, we argue to identify inadvertent tax knowledge diffusion via strategic alliances.

5. Facilitators

5.1 ELAPSED TIME

[Table 4]

Knowledge diffusion is a gradual, multi-stage process (Inkpen [2000], Szulanski [1996], Bresman et al. [2010]) and elapsed time is suggested to increase the probability of uniformity of actions in networks (Gale and Kariv [2003]). To test whether elapsed time facilitates tax knowledge diffusion via strategic alliances, we estimate five specifications of equation (5). We extend the posttreatment period by one year with each specification. We notate post = 1 only for the year of network initiation $[t_1]$ first and finish with post equaling one for the entire posttreatment embargo period $[t_1; t_5]$. The coefficients of treatment * post present the cumulative adjustment of a high-tax firm's tax planning behavior with elapsed time $(t_1 to t_5)$ when cooperating with low-tax firms. The results of this analysis are presented in Table 4. In accordance with our theoretical framework, the coefficient of treatment * post is statistically insignificant when the posttreatment period is limited to the year of network initiation. This finding is consistent with our notion that strategic alliances, per se, do not aim at facilitating tax planning. The coefficient of the interaction,

¹¹ Our results are robust to (i) excluding *firm controls*, δ_{ind} , and τ_t from the model (untabulated) and (ii) using the cash tax differential developed by Henry and Sansing [2018], which reflects the extent to which a firm is tax-favored (Table OS 5). Additionally, we implement an interaction weighted two way fixed effects estimator under consideration of the recent advances by Sun and Abraham [2020] (Table OS 3).

however, becomes significant when *post* spans from t_1 to t_2 . Furthermore, the estimated effect continues to be significant when extending the posttreatment period to t_3 , t_4 , and t_5 . This estimation of treatment effects shows that high-tax firms are, on average, able to adjust their tax planning behavior within two years of network initiation.¹² This finding is consistent with recent research by Kim et al. [2019], who suggest that firms are generally able to adjust their tax planning behavior within three years and that high-tax firms may increase their tax planning behavior faster. Our results suggest that elapsed time facilitates tax knowledge diffusion via strategic alliances.

5.2 DISTANCE, INDUSTRY AFFILIATION, AUDIT FIRM

[Table 5]

Our theoretical framework highlights the behavioral aspects of tax planning processes and suggests that especially soft factors (e.g., the time-consuming building of trust) facilitate tax knowledge diffusion via strategic alliances. Tax research on cross-firm connections, however, often considers firms' organizational structures and their environments. Consistently, we investigate whether geographical proximity (*SameBEARegion*)¹³ and shared industry affiliation (*SameInd*) intensify or mitigate the identified effects. However, we treat these analyses as open empirical questions for strategic alliances without clear predictions. We do so because the outlined theoretical framework for tax knowledge diffusion via strategic alliances suggests that facilitators particularly appear neither mutually exclusive nor reinforcing when firms' organizational structures and their environments are analyzed (e.g., see Bourveau et al. [2020] and Cai and Szeidl [2018] on the opposing effects of competition on collusion and diffusion of information).

¹² We document consistent evidence for specifications of equation (4) with single-year *cash ETR* and five-year *(delta) cash ETR*5 as dependent variables. The coefficients for *hightolow* are negative albeit statistically significant for the multiperiod dependent variables (untabulated). Our results are also robust to estimating an interaction weighted two way fixed effects approach (Table OS 3).

¹³ Using *SameBEARegion* is consistent with Brown [2011]. The implications remain generally unchanged for intereactions of *hightolow* with *Proximity* (untabulated).

In Panel A of Table 5, we interact *hightolow* with the indicator variable *SameBEARegion*. We observe significant and negative coefficient estimates of *hightolow* in both specifications. However, the estimates for *SameBEARegion* * *hightolow* do not surpass common levels of statistical significance. While this finding is generally consistent with the inferences by Brown [2011] on geographical proximity, Cen et al. [2020] report that the correlation of effective tax rates in supply chains is stronger for firms that are located within the same region. This emphasizes the importance of various channels for the diffusion and transfer of tax knowledge and distinguishes strategic alliances from other cross-firm connections. Our inferences for interacting *hightolow* with *SameInd* are similar. In particular, we cannot reject that the interactions of *hightolow* and *SameInd* are significantly different from zero. This finding is consistent with Brown and Drake [2014].

Next, we turn to shared audit firms (*SameAuditor*) to test for the impact of an alternative channel. Whether auditors impact firms' tax planning behavior is much debated in the literature. In our analysis, the interaction terms for *hightolow* * *SameAuditor* do not surpass common levels of statistical significance (PanelC of Table 5). Our findings indicate that a shared audit firm would serve as a substitute rather than as a complement for low-tax networks of high-tax firms. This inference takes place alongside a range of mixed inferences concerning auditors' impact on firms' tax planning behavior. Brown [2011] does not find significant tax shelter adoption via shared audit firms, and Klassen et al. [2016] show that less tax aggressiveness in the past is associated with the auditor preparing a firm's tax return. In contrast, Lim et al. [2018] and Cen et al. [2020] suggest that shared auditors facilitate tax planning. Consistent with the mixed evidence from prior literature, Nesbitt et al. [2020] suggest that there are limits to the relation between auditor-provided tax services and clients' tax planning.

6. Effects on the Reporting of Operations

[Table 6]

To triangulate our findings, we analyze the effects of low-tax networks on firms' reporting of operations. Thereby, we identify drivers of the changes in tax planning behavior and corroborate our evidence that these changes are due to tax knowledge diffusion. We are also able to shed light on whether firms modify their organizational structure in response to varying network types.

6.1 TEXTUAL SENTIMENT OF 10-K FILINGS

Law and Mills [2015] show that linguistic cues in firms' qualitative disclosures provide incremental information beyond traditional accounting variables to predict tax planning. They provide evidence that the use of negative words (i.e., textual sentiment) in firms' 10-K filings suggests (future) tax planning. Quantifying language to measure firms' fundamentals has received massive interest in accounting and finance literature since Tetlock et al. [2008] and Loughran and McDonald [2011] pioneered in this field (for comprehensive reviews, see Loughran and McDonald [2016], [2020b] and Teoh [2018]). Commonly, accounting-specific dictionaries (bag of words) that share common sentiments (e.g., positive, negative) are used to measure a document's textual sentiment. While word classifications can largely differ according to the investigated setting (Loughran et al. [2019], Loughran and McDonald [2020a]), the focus is generally on the use of negative words.

We analyze whether the textual sentiment in firms' 10-K filings changes differently for high-tax firms in strategic alliances with low-tax firms relative to high-tax firms in high-tax strategic alliances. We estimate specifications of equation (5) with *Sentiment (Use of Negative Words)* as dependent variables.¹⁴ The results are depicted in Table 6. The estimate for the interaction of *treated * post* is negative (positive) and statistically significant in both specifications. This negative response of 10-K filings' textual sentiment can be associated with tax planning behavior (Law and Mills [2015]). Law and Mills (2015), however, identify local average treatment effects by employing exogenous shocks to external financial constraints as instrumental variables for decreasing textual sentiment. Therefore, we estimate equation (5) with *Whited Wu Index* as a proxy for firms' financial constraints as the dependent variable (Whited and Wu

¹⁴ Data on textual sentiment of 10-K filings is shared publicly by Bill McDonald. Please refer to the variable definitions in the Appendix for further details. A graphical investigation of the parallel trend test is presented in the GitHub repository.

[2006]). The coefficient for *treated* * *post* in this test indicates that the identified decreases in textual sentiment of 10-K filings are not accompanied by increases in the firms' financial constraints (untabulated). Consequently, the treated firms in our sample seem not to increase their tax planning as a substitute for a more expensive source of external financing. We conclude that this supports the identification of tax knowledge diffusion via strategic alliances. Furthermore, our results indicate that changes in firms' tax planning may be accompanied by changes in their disclosure behavior.

6.2 TAX HAVEN OPERATIONS

Exhibit 21 of a 10-K filing lists all subsidiaries of a registrant, the state, or other jurisdiction of incorporation or organization of each, and the names under which such subsidiaries do business. Exceptions apply for subsidiaries, which are not considered "significant" (see Dyreng et al. [2020] and Demeré et al. [2020] for detailed explanations). Utilizing these data allows us to test whether the high-tax firms' changes in tax planning are accompanied by increases in the reported operations in international tax havens (Dyreng and Lindsey [2009]) or the State of Delaware (Dyreng et al. [2013]).¹⁵

Dyreng and Lindsey [2009] use exhibit 21 disclosures to show that US firms with material operations in at least one tax haven country generally report lower effective tax rates. Therefore, we estimate equation (5) with the indicator variable *Use of Tax Haven* as the dependent variable.¹⁶ The estimate for the interaction of *treated* * *post* is negative but not significant (Table 6). This suggests that high-tax firms, on average, are able to increase their cash tax savings without increasing the reported operations in international tax haven countries. Furthermore, we focus on firms' reported operations in the State of Delaware because Dyreng et al. [2013] suggest that firms employ tax planning strategies that involve the strategic location of subsidiaries in the state. Consistent with Dyreng et al. [2013], we construct the indicator variable

¹⁵ Exhibit 21 disclosure data are shared publicly by Scott Dyreng. Please refer to the variable definitions in the Appendix for further details. A graphical investigation of the parallel trend test is presented in the GitHub repository. ¹⁶ In an untabulated test we employ the continuous variable *Num of Tax Haven Subs* as dependent variable and find consistent results. The appendix contains detailed variable definitions.

Delaware Strategy to approximate the role that Delaware plays as domestic tax haven. We find that the estimate of *treated* * *post* is positive but not statistically significant when estimating equation (5) with *Delaware Strategy* as the dependent variable. This suggests that low-tax networks are not generally accompanied by increases in high-tax firms' operations in tax havens. However, data from exhibit 21 cannot quantify the magnitude, extent, or legal structure of all tax haven activities. In particular, one cannot identify specific tax planning transactions (Law and Mills [2019]). Therefore, we cautiously conclude that our findings suggest that high-tax firms use existing, yet not fully exploited, structures for tax planning.

7. Robustness Checks

In the online supplement, we examine the robustness of our results. In particular, we show (i) that there is no economically meaningful tax knowledge effect for low-tax firms. Furthermore, we perform (ii) falsification tests with 1000 iterations of placebo indicators for *hightolow* among untreated high-tax firms. Additionally, we implement (iii) an interaction weighted two way fixed effects estimator under consideration of the recent advances by Sun and Abraham [2020]. We examine (iv) an alternative identification strategy, (v) an alternative tax knowledge measure, (vi) the employment of alternative entropy balancing weights in the DiD analysis, and (vii) alternative explanations regarding nonsurvivors and effects on profitability. Throughout these tests, our results remain robust.

8. Conclusion

The purpose of this study is to shed light on whether tax knowledge diffuses between firms via strategic alliances. Our study builds on theory which highlights the behavioral aspects of tax planning processes because knowledge diffusion is shaped by soft factors such as communication and trust. In particular, the theoretical framework of tax knowledge diffusion does not depend on the assumption of an intentional transfer of tax knowledge via an intermediary. Utilizing data on strategic alliances between publicly traded US firms allows us to distinguish between networks that bring together high-tax and low-tax firms. We empirically identify tax knowledge diffusion via strategic alliances by robustly documenting an economically meaningful decrease in cash effective tax rates of high-tax firms in strategic alliances with

low-tax firms relative to high-tax firms in strategic alliances with other high-tax firms. Furthermore, we find that the adjustment occurs on average within two years after a strategic alliance's initiation. This suggests that elapsed time is an important facilitator for tax knowledge diffusion.

Our findings are subject to the caveat that respectively the outcome (i.e., change in the tax planning behavior) of tax knowledge diffusion is measurable. Consistent with, for instance, MARTENS and Sextroh [2021] who investigate information flows via common analysts, we cannot observe the actual mechanisms of the diffusion process. In particular, publicly available data impede the identification of mechanisms when tacit tax knowledge diffuses because firms are generally able to make use of peers' salient information for tax planning purposes (Bird et al. [2018]). Therefore, relevant mechanisms that are based on trust- and communication-based may empirically be proxied for by elapsed time respectively. Consequently, we encourage future research to further investigate the nature of knowledge diffusion and hope that our study highlights the importance of considering taxes in interdisciplinary contexts.

Appendix: Variable Definitions

Variable	Definition [Compustat (low)/SDC (CAPITAL)/other (<i>ITALICS</i>) data items]
cash ETR3	Multiperiod cash effective tax rate:
	$cash \ ETR3_{i,t=1} = \frac{\sum_{t=1}^{3} (txpd_{i,t})}{\sum_{t=1}^{3} (pi_{i,t} - spi_{i,t})}$
	$\sum_{i,t=1}^{3} \sum_{i=1}^{3} (pi_{i,t} - spi_{i,t})$
	Defined as cash taxes paid (txpd) divided by pre-tax income (pi) before special
	items (spi); special items are reset to 0 when missing; numerator and
	denominator are constructed as the sum of the current and two subsequent years;
	observations with a negative denominator are reset to missing; for the final and
	penultimate firm-year of a firm substituted by annual cash ETR; winsorized at 0
	and 1.
cash ETR5	Constructed as cash ETR3 but with numerator and denominator constructed over five years.
change cash ETR3	First difference estimator of cash ETR3 $[t_1; t_3]$ and pre cash ETR3 $[t_{-2}; t_0]$:
	-
CTD & change CTD3	$\frac{change \ cash \ ETR3 = cash \ ETR3_{[t_1;t_3]} - pre \ cash \ ETR_{[t_{-2};t_0]}}{Cash \ Tax \ Differential \ calculated \ as in Henry and Sansing [2018]; winsorized at}$
or 2 a change or 20	p1 and p99.
Delaware Strategy	Indicator variable; equals 1 for firm-years with a relatively large number (upper
	third) of subsidiaries in Delaware (STATECOUNT and STATECODE; consistent
	with Dyreng et al. [2013]); 0 otherwise; calculated at the level of the global
	exhibit 21 data.
delta cash ETR3	Cash ETR3 $[t_1; t_3]$ scaled by pre cash ETR3 $[t_{-2}; t_0]$:
	$delta \ cash \ ETR3 = \frac{cash \ ETR3_{[t_1;t_3]}}{pre \ cash \ ETR_{[t_n;t_0]}} - 1$
	pre cash $ETR_{[t_{-2};t_0]}$
	winsorized at p99; reset to 0 when denominator equals 0.
delta cash ETR5	Constructed as delta cash ETR3 but with cash ETR5 as numerator; winsorized
	at p99; reset to delta cash ETR3 when missing.
embargo period	Period of three years before $[t_{-2};t_0]$ and five years subsequent $[t_1;t_5]$ to a network
	initiation during which a firm may not invest in another strategic alliance
Exhibit 21 Data	(exclusion of overlapping events). Data on exhibit 21 disclosure is shared publicly by Scott Dyreng:
Exhibit 21 Data	https://sites.google.com/site/scottdyreng/Home/data-and-code/EX21-Dataset.
	We consider disclosed tax haven subsidiaries (<i>TAXHAVEN</i>) and rely on the
	classification of the jurisdictions as tax havens. We count TAXHAVEN
	occurrences ourselves and do not use COUNT because manual inspections of
	10-K filings show that country names are counted multiple times when occurring
	in the subsidiaries' names (NAME) as well (as indicated by the data description).
high-tax firm	Inverse to low-tax firm; indicator variable in t ₁ ; equals 1 if the firm's industry
	mean adjusted pre cash ETR3 in t_0 does not belong to the lowest quartile; 0 for
	low-tax firms.
hightolow	Indicator variable; equals 1 for high-tax firms in low-tax networks; equals 0 for high tax firms in high tax networks
low-tax firm	high-tax firms in high-tax networks. Indicator variable in t ₁ ; equals 1 if the firm's industry adjusted pre cash ETR3 in
	t_0 belongs to the lowest quartile ("first bin"); 0 for high-tax firms.
lowtohigh	Indicator variable; equals 1 for low-tax firms in high-tax networks; equals 0 for
	low-tax firms in low-tax networks.
$\sum_{i=1}^{n} \sum_{j=1}^{n} \sum_{i=1}^{n} \sum_{i$	Indicator variables for the main business purpose of a network, which is derived
\sum network controls	from a network's deal description (DEALTEXT) in SDC; comprises
	PurposeWholesale, PurposeRnD, PurposeLicense, PurposeService,
	PurposeMarketing, PurposeSupply, PurposeTech and PurposeManufacture.

Variable	Definition [Compustat (low)/SDC (CAPITAL)/other (ITALICS) data items]
Num of Tax Haven Subs	Measure of material tax haven operations, calculated as
	Num of Tax Haven Subsidiaries = $\ln \left(1 + \sum TAXHAVEN_{i,t}\right)$
	See exhibit 21 for data origin.
\sum partner controls	See Proximity and SameAuditor for main analysis (equation (4)).
post	Indicator variable; equals 0 in pretreatment period and 1 in posttreatment period.
pre cash ETR3	Constructed as cash ETR3 but with numerator and denominator constructed as
	the sum of the current and two preceding periods:
	$pre \ cash \ ETR3_{i,t=0} = \frac{\sum_{t=-2}^{0} (txpd_{i,t})}{\sum_{t=-2}^{0} (pi_{i,t} - spi_{i,t})}$
	Industry adjusted pre cash ETR [t-2;t0] is used to identify low- and high-tax firms
Proximity	in t_1 . Distance (in miles as the crow flies) between the partners of a network according
Proximity	to the zip code of the partners' headquarters (addzip); collected from
	freemaptools.com; calculated as -1*Distance, standardized for regressions.
SameAuditor	Indicator variable; equals 1 when all partners of a network share the same auditor
	firm (au) in t_1 ; 0 otherwise.
SameInd	Constructed as SameAuditor but for industry affiliation; industry is classified
	using two-digit SIC codes (sic); see also Table 1, Panel C.
SameBEARegion	Constructed as SameAuditor; equals 1 when all network partners are located in
	the same BEA region in t_1 ; 0 otherwise; the respective regions, as defined by the
	Bureau of Economic Analysis, are Far West, Great Lakes, Mideast, New
	England, Plains, Rocky Mountains, Southeast and Southwest.
Sentiment	Measure of textual sentiment of the underlying 10-K filing, calculated as
	$Sentiment_{i,t} = \frac{(n_{pos} - n_{negation}) - n_{negative}}{n_{total}}$
	totat
	See Textual Sentiment for data origin.
Strategic Alliance (Network)	Contractual-based cooperation between US firms in the sample period 1994 to 2016, extracted from SDC Platinum (STRATEGICALLIANCE/SAF).
Textual Sentiment Data	Data on textual sentiment is shared publicly by Bill McDonald:
	https://sraf.nd.edu/textual-analysis/resources/. We consider 10-K filings
	(FORM_TYPE), positive, negative, total words (N_POSITIVE, N_NEGATIVE,
two stood	<i>N_TOTAL</i>), and negations (<i>N_NEGATION</i>).
treated	Treatment is set according to hightolow if strategic alliance falls into embargo
	period (exclusion of overlapping events). Control observations are weighted to treatment observations by entropy balancing (weighting) on continuous firm
	controls (mean and variance) in the balanced sample.
treated * post	Interaction of treated and post; main variable of interest in the difference-in-
	differences model.
Use of Negative Words	Measure of textual sentiment of the underlying 10-K filing, calculated as
	Use of Negative Words _{i,t} = $\frac{n_{negative}}{n_{total}}$
	See Textual Sentiment for data origin. n_{total}
Use of Tax Haven	Measure of material tax haven operations; Indicator variable, equals 1 if
ose oj tax naven	$\sum TAXHAVEN_{i,t} > 0$ (at least one tax haven subsidiary in Exhibit 21 in firm-
	year); 0 otherwise; see exhibit 21 for data origin.
	year, o otherwise, see exhibit 21 for data origin.

Variable	Definition [Compustat (low)/SDC (CAPITAL)/other (<i>ITALICS</i>) data items] Firm Controls
	vinsorized at p1 and p99 and are neither mean-centered nor standardized for analyses.
	e continuous <i>firm controls</i> are used in specifications with <i>change cash ETR3</i> as
-	r DiD specifications, annual measures of the <i>firm controls</i> are employed.
AdExp3	Advertising expense (xad) divided by net sales (sale); numerator and
	denominator are constructed as the sum of the current and two subsequent years
	when missing reset to annual measure, thereafter reset to 0.
CapEx3	Reported capital expenditures (capx) divided by gross property, plant, and
	equipment (ppegt); numerator and denominator are constructed as the sum of th
	current and two subsequent years; when missing reset to annual measure
	thereafter reset to 0.
Cash3	Cash and cash equivalents (che) divided by total assets (at); numerator and
	denominator are constructed as the sum of the current and two subsequent years
	when missing reset to annual measure, thereafter reset to 0.
GrowthSale3	The annual average growth rate (geometric mean) of net sales (sale) over three
	years $\left(\sqrt[3]{\frac{sale_{t3}}{sale_{t1}}} - 1\right)$; when missing reset to annual growth rate from t_0 to t_1
	thereafter reset to 0.
EBITDA3	Earnings before interest, taxes, depreciation and amortization (ebitda) scaled by
	total assets (at); numerator and denominator are constructed as the sum of th
	current and two subsequent years; when missing reset to annual measure
	thereafter reset to 0.
Intangibles3	The ratio of intangible assets (intan) to total assets (at); numerator and
	denominator are constructed as the sum of the current and two subsequent years
	when missing reset to annual measure, thereafter reset to 0.
Leverage3	The sum of long-term debt (dltt) and long-term debt in current liabilities (dlc
	divided by total assets (at); numerator and denominator are constructed as th
	sum of the current and two subsequent years; when missing reset to annua
	measure, thereafter reset to 0.
MNE3	Indicator variable; equals 1 if $\sum_{t=1}^{3} (pif o_{i,t}) > 0$ (nonmissing, nonzero valu
	for pre-tax income from foreign operations); 0 otherwise.
NOL3	Indicator variable equals 1 if $\sum_{t=1}^{3} (t l c f_{i,t}) > 0$ (nonmissing, nonzero value of
	tax loss carry forward); 0 otherwise.
PPE3	Gross property, plant, and equipment (ppegt) divided by total assets (at)
rr£5	numerator and denominator are constructed as the sum of the current and two
	subsequent years; when missing reset to annual measure, thereafter reset to 0.
RnDExp3	Research and development expenses (xrd) scaled by net sales (sale); numerato
KILD EXPS	and denominator are constructed as the sum of the current and two subsequer
	-
SC 12	years; when missing reset to annual measure, thereafter reset to 0.
SGA3	Selling, general, and administrative expense (xsga); divided by net sales (sale)
	numerator and denominator are constructed as the sum of the current and two
<i>a</i> , <i>a</i>	subsequent years; when missing reset to annual measure, thereafter reset to 0.
Size3	The natural log of total assets (at) for the respective and two subsequent periods
	when missing reset to annual measure, thereafter reset to 0 .

References

- ACEMOGLU, D; M. A. DAHLEH; I. LOBEL; AND A. OZDAGLAR. "Bayesian Learning in Social Networks." *The Review of Economic Studies* 78 (4) (2011): 1201–1236.
- AKCIGIT, U., AND S. ATES. "Ten Facts on Declining Business Dynamism and Lessons from Endogenous Growth Theory." 2019.
- ANAND, B. N., AND T. KHANNA. "Do Firms Learn to Create Value? The Case of Alliances." *Strategic Management Journal* 21 (3) (2000): 295–315.
- AOBDIA, D. "Proprietary information spillovers and supplier choice: evidence from auditors." *Review of Accounting Studies* 20 (4) (2015): 1504–1539.
- ARMSTRONG, C. S; J. L. BLOUIN; A. D. JAGOLINZER; AND D. F. LARCKER. "Corporate governance, incentives, and tax avoidance." Journal of Accounting and Economics 60 (1) (2015): 1–17.
- AUSTIN, C. R., AND R. J. WILSON. "An Examination of Reputational Costs and Tax Avoidance: Evidence from Firms with Valuable Consumer Brands." *Journal of the American Taxation Association* 39 (1) (2017): 67–93.

BARRIOS, J. M., AND J. GALLEMORE. "Tax Planning Knowledge Diffusion via the Labor Market." Working Paper (2021).

- BAXAMUSA, M; A. JALAL; AND A. JHA. "It pays to partner with a firm that writes annual reports well." *Journal of Banking & Finance* 92 (2018): 13–34.
- BENA, J., AND K. LI. "Corporate Innovations and Mergers and Acquisitions." Journal of Finance 69 (5) (2014): 1923–1960.
- BIANCHI, P. A; D. FALSETTA; M. MINUTTI-MEZA; AND E. WEISBROD. "Joint Audit Engagements and Client Tax Avoidance: Evidence from the Italian Statutory Audit Regime." *Journal of the American Taxation Association* (2018).
- BIRD, A; A. EDWARDS; AND T. G. RUCHTI. "Taxes and Peer Effects." The Accounting Review 93 (5) (2018): 97-117.
- BLONSKI, M. "Social learning with case-based decisions." Journal of Economic Behavior & Organization 38 (1) (1999): 59-77.
- BLOUIN, J., AND L. ROBINSON. "Double Counting Accounting: How Much Profit of Multinational Enterprises Is Really in Tax Havens?" Working Paper (2020).
- BOONE, A. L., AND V. I. IVANOV. "Bankruptcy spillover effects on strategic alliance partners." *Journal of Financial Economics* 103 (3) (2012): 551–569.
- BOURVEAU, T; G. SHE; AND A. ŽALDKOKAS. "Corporate Disclosure as a Tacit Coordination Mechanism: Evidence from Cartel Enforcement Regulations." *Journal of Accounting Research* 58 (2) (2020): 295–332.
- BRESMAN, H; J. BIRKINSHAW; AND R. NOBEL. "Knowledge transfer in international acquisitions." Journal of International Business Studies 41 (1) (2010): 5–20.
- BROWN, J. L. "The Spread of Aggressive Corporate Tax Reporting: A Detailed Examination of the Corporate-Owned Life Insurance Shelter." The Accounting Review 86 (1) (2011): 23–57.
- BROWN, J. L., AND K. D. DRAKE. "Network Ties Among Low-Tax Firms." The Accounting Review 89 (2) (2014): 483-510.
- BUSHEE, B. J; J. KIM-GINA; AND E. LEUNG. "Public and Private Information Channels along Supply Chains: Evidence from Contractual Private Forecasts." *Working Paper* (2020).
- CAI, J., AND A. SZEIDL. "Interfirm Relationships and Business Performance*." *The Quarterly Journal of Economics* 133 (3) (2018): 1229–1282.
- CAI, Y; D. S. DHALIWAL; Y. KIM; AND C. PAN. "Board interlocks and the diffusion of disclosure policy." *Review of Accounting Studies* 19 (3) (2014): 1086–1119.
- CAI, Y; Y. KIM; J. C. PARK; AND H. D. WHITE. "Common auditors in M&A transactions." *Journal of Accounting and Economics* 61 (1) (2016): 77–99.
- CAI, Y., AND M. SEVILIR. "Board connections and M&A transactions." Journal of Financial Economics 103 (2) (2012): 327-349.
- CEN, L; E. L. MAYDEW; L. ZHANG; AND L. ZUO. "Customer-supplier relationships and corporate tax avoidance." Journal of Financial Economics 123 (2) (2017): 377–394.
- CEN, L; E. L. MAYDEW; L. ZHANG; AND L. ZUO. "Tax Planning Diffusion, Real Effects, and Sharing of Benefits." Working Paper (2020).
- CHAN, S. H; J. W. KENSINGER; A. J. KEOWN; AND J. D. MARTIN. "Do strategic alliances create value?" Journal of Financial Economics 46 (2) (1997): 199–221.
- CHEN, J; T.-H. D. KING; AND M.-M. WEN. "Do joint ventures and strategic alliances create value for bondholders?" *Journal of Banking & Finance* 58 (2015): 247–267.
- CHENG, C. S. A; P. GUO; C.-H. WENG; AND Q. WU. "Innovation and Corporate Tax Planning: The Distinct Effects of Patents and R&D*." *Contemporary Accounting Research* Forthcoming (2020).
- CLAUSING, K. A. "The Effect of Profit Shifting on the Corporate Tax Base in the United States and Beyond." *National Tax Journal* 69 (4) (2016): 905–934.
- CONROY, R. M. "What Hypotheses do "Nonparametric" Two-Group Tests Actually Test?" *The Stata Journal* 12 (2) (2012): 182–190.
- DEMERÉ, P; M. P. DONOHOE; AND P. LISOWSKY. "The Economic Effects of Special Purpose Entities on Corporate Tax Avoidance." Contemporary Accounting Research 37 (3) (2020): 1562–1597.
- DESAI, M. A; C. F. FOLEY; AND J. R. HINES. "The costs of shared ownership: Evidence from international joint ventures." *Journal of Financial Economics* 73 (2) (2004): 323–374.
- DHALIWAL, D. S; P. T. LAMOREAUX; L. P. LITOV; AND J. B. NEYLAND. "Shared auditors in mergers and acquisitions." Journal of Accounting and Economics 61 (1) (2016): 49–76.

- DI MAGGIO, M; F. FRANZONI; A. KERMANI; AND C. SOMMAVILLA. "The relevance of broker networks for information diffusion in the stock market." *Journal of Financial Economics* 134 (2) (2019): 419–446.
- DIESTRE, L., AND N. RAJAGOPALAN. "Are all 'sharks' dangerous? new biotechnology ventures and partner selection in R&D alliances." *Strategic Management Journal* 33 (10) (2012): 1115–1134.
- DYER, J. H., AND N. W. HATCH. "Relation-specific capabilities and barriers to knowledge transfers: creating advantage through network relationships." *Strategic Management Journal* 27 (8) (2006): 701–719.
- DYRENG, S. D; M. HANLON; AND E. L. MAYDEW. "Long Run Corporate Tax Avoidance." *The Accounting Review* 83 (1) (2008): 61–82.
- DYRENG, S. D; M. HANLON; AND E. L. MAYDEW. "The Effects of Executives on Corporate Tax Avoidance." *The Accounting Review* 85 (4) (2010): 1163–1189.
- DYRENG, S. D; M. HANLON; AND E. L. MAYDEW. "When Does Tax Avoidance Result in Tax Uncertainty?" *The Accounting Review* 94 (2) (2019): 179–203.
- DYRENG, S. D; M. HANLON; E. L. MAYDEW; AND J. R. THORNOCK. "Changes in corporate effective tax rates over the past 25 years." Journal of Financial Economics 124 (3) (2017): 441–463.
- DYRENG, S. D; J. L. HOOPES; P. LANGETIEG; AND J. H. WILDE. "Strategic Subsidiary Disclosure." Journal of Accounting Research 58 (3) (2020): 643–692.
- DYRENG, S. D., AND B. P. LINDSEY. "Using Financial Accounting Data to Examine the Effect of Foreign Operations Located in Tax Havens and Other Countries on U.S. Multinational Firms' Tax Rates." *Journal of Accounting Research* 47 (5) (2009): 1283– 1316.
- DYRENG, S. D; B. P. LINDSEY; AND J. R. THORNOCK. "Exploring the role Delaware plays as a domestic tax haven." Journal of Financial Economics (108) (2013): 751-772.
- DYRENG, S. D., AND E. L. MAYDEW. "Virtual Issue on Tax Research Published in the Journal of Accounting Research." Working Paper (2017).
- EDWARDS, A; C. SCHWAB; AND T. SHEVLIN. "Financial Constraints and Cash Tax Savings." *The Accounting Review* 91 (3) (2016): 859–881.
- ERICKSON, M. "The Effect of Taxes on the Structure of Corporate Acquisitions." Journal of Accounting Research 36 (2) (1998): 279–298.
- ERICKSON, M. M., AND S.-W. WANG. "Exploiting and Sharing Tax Benefits: Seagram and DuPont." Journal of the American Taxation Association 21 (2) (1999): 35–54.
- FIOL, C. M., AND M. A. LYLES. "Organizational Learning." Academy of Management Review 10 (4) (1985): 803-813.
- FRANK, M; E. MAKSYMOV; M. PEECHER; AND A. REFFETT. "Beyond Risk Shifting: The Knowledge Transferring Role of Audit Liability Insurers." Contemporary Accounting Research (2021).
- FREY, L. "Tax certified individual auditors and effective tax rates." Business Research 11 (1) (2018): 77-114.
- GALE, D., AND S. KARIV. "Bayesian learning in social networks." Games and Economic Behavior 45 (2) (2003): 329-346.
- GALLEMORE, J; B. GIPPER; AND E. L. MAYDEW. "Banks as Tax Planning Intermediaries." *Journal of Accounting Research* 57 (1) (2019): 169–209.
- GALLEMORE, J; E. L. MAYDEW; AND J. R. THORNOCK. "The Reputational Costs of Tax Avoidance." Contemporary Accounting Research 31 (4) (2014): 1103–1133.
- GOMES-CASSERES, B; J. HAGEDOORN; AND A. B. JAFFE. "Do alliances promote knowledge flows?" *Journal of Financial Economics* 80 (1) (2006): 5–33.
- GRAHAM, J. R; M. HANLON; T. SHEVLIN; AND N. SHROFF. "Incentives for Tax Planning and Avoidance: Evidence from the Field." *The Accounting Review* 89 (3) (2014): 991–1023.
- GUENTHER, D. A; S. R. MATSUNAGA; AND B. M. WILLIAMS. "IS Tax Avoidance Related to Firm Risk?" *The Accounting Review* 92 (1) (2017): 115–136.
- HAINMUELLER, J. "Entropy Balancing for Causal Effects: A Multivariate Reweighting Method to Produce Balanced Samples in Observational Studies." *Political Analysis* 20 (1) (2012): 25–46.
- HAINMUELLER, J., AND Y. XU. "Ebalance: A Stata Package for Entropy Balancing." Journal of Statistical Software 54 (7) (2013).
- HAMEL, G. "Competition for Competence and Inter-Partner Learning Within International Strategic Alliances." *Strategic Management Journal* 12 (1991): 83–103.
- HANLON, M., AND S. HEITZMAN. "A review of tax research." Journal of Accounting and Economics 50 (2-3) (2010): 127–178.
- HANLON, M., AND J. SLEMROD. "What does tax aggressiveness signal? Evidence from stock price reactions to news about tax shelter involvement." Journal of Public Economics 93 (1-2) (2009): 126–141.
- HENRY, E., AND R. SANSING. "Corporate Tax Avoidance: Data Truncation and Loss Firms." *Review of Accounting Studies* 23 (3) (2018): 1042–1070.
- HIGGINS, M. J., AND D. RODRIGUEZ. "The outsourcing of R&D through acquisitions in the pharmaceutical industry." *Journal of Financial Economics* 80 (2) (2006): 351–383.
- HOPPE, T; D. SCHANZ; S. STURM; AND C. SURETH-SLOANE. "The Tax Complexity Index A Survey-Based Country Measure of Tax Code and Framework Complexity." *European Accounting Review* (2021).
- HUNDSDOERFER, J., AND M. JACOB. "Conforming Tax Planning and Firms' Cost Behavior." Working Paper (2019).
- HÜNERMUND, P., AND B. LOUW. "On the Nuisance of Control Variables in Regression Analysis." Working Paper (2020).
- INKPEN, A. C. "Learning Through Joint Ventures: A Framework Of Knowledge Acquisition." *Journal of Management Studies* 37 (7) (2000): 1019–1044.

- INKPEN, A. C., AND P. W. BEAMISH. "Knowledge, Bargaining Power, and the Instability of International Joint Ventures." Academy of Management Review 22 (1) (1997): 177.
- ISAKSSON, O. H; M. SIMETH; AND R. W. SEIFERT. "Knowledge spillovers in the supply chain: Evidence from the high tech sectors." *Research Policy* 45 (3) (2016): 699–706.
- ISHII, J., AND Y. XUAN. "Acquirer-target social ties and merger outcomes." Journal of Financial Economics 112 (3) (2014): 344–363.
- JIANG, X; Y. BAO; Y. XIE; AND S. GAO. "Partner trustworthiness, knowledge flow in strategic alliances, and firm competitiveness: A contingency perspective." *Journal of Business Research* 69 (2) (2016): 804–814.
- KALE, P; H. SINGH; AND J. BELL. "Relating well: Building Capabilities for Sustaining Alliance Networks." In *The Network Challenge*, edited by Kleindorfer, Paul, R. and Gunther, Robert, E., 2009.
- KALE, P; H. SINGH; AND H. PERLMUTTER. "Learning and Protection of Proprietary Assets in Strategic Alliances: Building Relational Capital." Strategic Management Journal 21 (3) (2000): 217–237.
- KEPLER, J. D. "Private Communication Among Competitors And Public Disclosure." Working Paper (2019).
- KHANNA, T; R. GULATI; AND N. NOHRIA. "The Dynamics of Learning Alliances: Competition, Cooperation, and Relative Scope." Strategic Management Journal 19 (3) (1998): 193–210.
- KIM, J; S. T. MCGUIRE; S. SAVOY; R. WILSON; AND J. CASKEY. "How Quickly Do Firms Adjust to Optimal Levels of Tax Avoidance?" Contemporary Accounting Research 36 (3) (2019): 1824–1860.
- KLASSEN, K. J; P. LISOWSKY; AND D. MESCALL. "The Role of Auditors, Non-Auditors, and Internal Tax Departments in Corporate Tax Aggressiveness." *The Accounting Review* 91 (1) (2016): 179–205.
- KLASSEN, K. J; P. LISOWSKY; AND D. MESCALL. "Transfer Pricing: Strategies, Practices, and Tax Minimization." Contemporary Accounting Research 34 (1) (2017): 455–493.
- KOGUT, B., AND H. SINGH. "The Effect of National Culture on the Choice of Entry Mode." Journal of International Business Studies 19 (3) (1988): 411-432.
- LAW, K., AND L. MILLS. "Taxes and Financial Constraints: Evidence from Linguistic Cues." Journal of Accounting Research 53 (4) (2015): 777–819.
- LAW, K., AND L. MILLS. "Taxes and Haven Activities: Evidence from Linguistic Cues." Working Paper (2019).
- LENNOX, C. S; J. R. FRANCIS; AND Z. WANG. "Selection Models in Accounting Research." *The Accounting Review* 87 (2) (2012): 589–616.
- LI, D; L. EDEN; M. A. HITT; AND R. D. IRELAND. "Friends, Acquaintances, or Strangers? Partner Selection in R&D Alliances." Academy of Management Journal 51 (2) (2008): 315–334.
- LI, K; J. QIU; AND J. WANG. "Technology Conglomeration, Strategic Alliances, and Corporate Innovation." *Management Science* 65 (11) (2019): 5065–5090.
- LIM, C. Y; T. J. SHEVLIN; K. WANG; AND Y. XU. "Tax Knowledge Diffusion Through Individual Auditor Network Ties: Evidence from China." *Working Paper* (2018).
- LINDSEY, L. "Blurring Firm Boundaries: The Role of Venture Capital in Strategic Alliances." *Journal of Finance* 63 (3) (2008): 1137–1168.
- LISOWSKY, P. "Seeking Shelter: Empirically Modeling Tax Shelters Using Financial Statement Information." *The Accounting Review* 85 (5) (2010): 1693–1720.
- LOUGHRAN, T., AND B. MCDONALD. "When Is a Liability Not a Liability? Textual Analysis, Dictionaries, and 10-Ks." Journal of Finance 66 (1) (2011): 35–65.
- LOUGHRAN, T., AND B. MCDONALD. "Textual Analysis in Accounting and Finance: A Survey." Journal of Accounting Research 54 (4) (2016): 1187–1230.
- LOUGHRAN, T., AND B. MCDONALD. "Measuring Firm Complexity." Working Paper (2020a).
- LOUGHRAN, T., AND B. MCDONALD. "Textual Analysis in Finance." Annual Review of Financial Economics 12 (1) (2020b): 357–375.
- LOUGHRAN, T; B. MCDONALD; AND I. PRAGIDIS. "Assimilation of oil news into prices." International Review of Financial Analysis 63 (2019): 105–118.
- MARTENS, T. I., AND C. J. SEXTROH. "Analyst Coverage Overlaps and Interfirm Information Spillovers." Journal of Accounting Research 59 (4) (2021): 1425–1480.
- MAZLOOMI KHAMSEH, H; D. JOLLY; AND L. MOREL. "The effect of learning approaches on the utilization of external knowledge in strategic alliances." *Industrial Marketing Management* 63 (2017): 92–104.
- MCGUIRE, S. T; T. C. OMER; AND D. WANG. "Tax Avoidance: Does Tax-Specific Industry Expertise Make a Difference?" The Accounting Review 87 (3) (2012): 975–1003.
- MEIER, M. "Knowledge Management in Strategic Alliances: A Review of Empirical Evidence." International Journal of Management Reviews 13 (1) (2011): 1–23.
- MEIER, M; M. LÜTKEWITTE; T. MELLEWIGT; AND C. DECKER. "How managers can build trust in strategic alliances: a meta-analysis on the central trust-building mechanisms." *Journal of Business Economics* 86 (3) (2016): 229–257.
- MOHANRAM, P., AND A. NANDA. "When do Joint Ventures create value?" Academy of Management Proceedings 1996 (1) (1996): 36–40.
- MULLIGAN, E., AND L. OATS. "Tax professionals at work in Silicon Valley." Accounting, Organizations and Society 52 (2016): 63-76.

- NESBITT, W. L; A. PERSSON; AND J. SHAW. "Auditor-Provided Tax Services and Clients' Tax Avoidance: Do Auditors Draw a Line in the Sand for Tax Advisory Services?" *Working Paper* (2020).
- NONAKA, I. "A Dynamic Theory of Organizational Knowledge Creation." Organization Science 5 (1) (1994): 14-37.
- OWEN, S., AND A. YAWSON. "Information asymmetry and international strategic alliances." *Journal of Banking & Finance* 37 (10) (2013): 3890–3903.
- PALOMERAS, N., AND D. WEHRHEIM. "The strategic allocation of inventors to R&D collaborations." *Strategic Management Journal* 42 (1) (2021): 144–169.
- PATEL, E., AND N. SEEGERT. "Using Strategic Interactions in Investment Decisions to Increase the Efficiency of Tax Policy." Working Paper (2015).
- PETERSEN, M. A. "Estimating Standard Errors in Finance Panel Data Sets: Comparing Approaches." *Review of Financial Studies* 22 (1) (2009): 435–480.
- PORRINI, P. "Can a Previous Alliance Between an Acquirer and a Target Affect Acquisition Performance?" *Journal of Management* 30 (4) (2004): 545–562.
- PwC. "New Entrants New Rivals. How Germany's top companies are creating a new industry world." 2018. Available at https://www.pwc.de/de/industrielle-produktion/pwc-studie-new-entrants-new-rivals-2018.pdf#page=6.

ROGERS, E. M. Diffusion of innovations. New York, London, Toronto, Sydney: Free Press, 2003.

- SAMPSON, R. C. "R&D Alliances and Firm Performance: The Impact of Technological Diversity and Alliance Organization on Innovation." Academy of Management Journal 50 (2) (2007): 364–386.
- SCHILLING, M. A. "Understanding the alliance data." Strategic Management Journal 30 (3) (2009): 233-260.
- SUN, L., AND S. ABRAHAM. "Estimating dynamic treatment effects in event studies with heterogeneous treatment effects." *Journal* of Econometrics (2020).
- SZULANSKI, G. "Exploring Internal Stickiness: Impediments to the Transfer of Best Practice Within the Firm." Strategic Management Journal 17 (1) (1996): 27-43.
- TAN, T. F., AND S. NETESSINE. "When You Work with a Superman, Will You Also Fly? An Empirical Study of the Impact of Coworkers on Performance." *Management Science* 65 (8) (2019): 3495–3517.
- TEOH, S. H. "The promise and challenges of new datasets for accounting research." Accounting, Organizations and Society 68-69 (2018): 109–117.
- TETLOCK, P; M. SAAR-TSECHANSKY; AND S. MACSKASSY. "More Than Words: Quantifying Language to Measure Firms' Fundamentals." *Journal of Finance* 63 (3) (2008): 1437–1467.
- TØRSLØV, T; L. WIER; AND G. ZUCMAN. "The Missing Profits of Nations." Working Paper National Bureau of Economic Research (2018).
- WHITED, T. M., AND G. WU. "Financial Constraints Risk." Review of Financial Studies 19 (2) (2006): 531-559.
- WILDE, J. H., AND R. J. WILSON. "Perspectives on Corporate Tax Planning: Observations from the Past Decade." Journal of the American Taxation Association 40 (2) (2018): 63–81.
- WILSON, R. J. "An Examination of Corporate Tax Shelter Participants." The Accounting Review 84 (3) (2009): 969–999.
- YIN, X., AND M. SHANLEY. "Industry Determinants of the "Merger Versus Alliance" Decision." Academy of Management Review 33 (2) (2008): 473–491.
- ZHAO, M. "Conducting R&D in Countries with Weak Intellectual Property Rights Protection." *Management Science* 52 (8) (2006): 1185–1199.

Figures

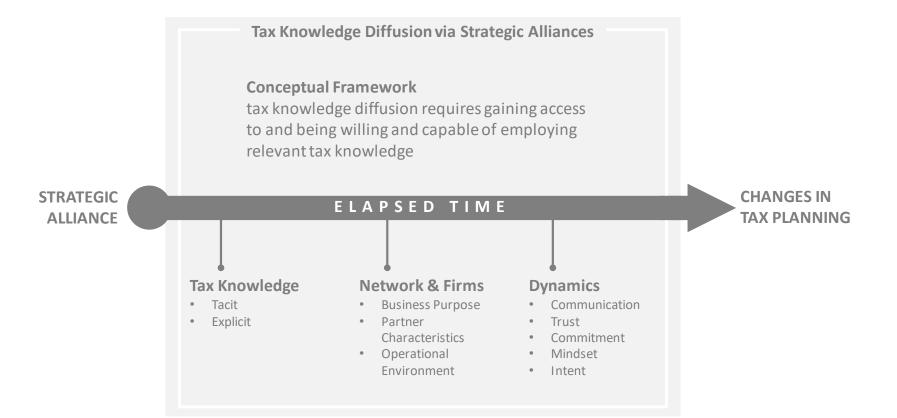


Figure 1

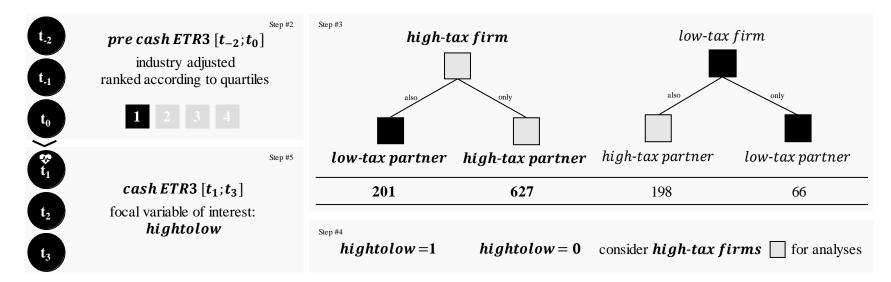
This figure depicts a black box model for tax knowledge diffusion via strategic alliances.

Figure 2

Sample Selection & Identificatio	n Strategy			
Sample Selection SDC Platinum (UPPER) and Compustat (lower) data items in parentheses	Network- Firm Obs.	Networks	Firm- Year Obs.	Firms
Compustat and SDC Platinum data matched (ULTPARENTCUSIP / cusip) according to year of network initiation (DATEEFFECTIVE / fyear) // networks between US firms (loc, fic, curcd, cik) // sample period 1994 - 2016	17,126	14,838	51,566	3,445
Identify all participants in a network	3,967	1,969	22,352	1,545
Identify pre cash ETR3 $[t_{-2};t_0]$ and cash ETR3 $[t_1;t_3]$ of all participants	1,092	543	9,206	502

Step #1

No Tax Knowledge Diffusion without a Sophisticated Tax Planner as Partner



This figure summarizes our sample selection and identification strategy. The heartbeat pictogram at t_1 indicates the year of initiation of a strategic alliance. The number of observations equals one observation per firm, which covers the first three years after the initiation of a strategic alliance.

Figure 3



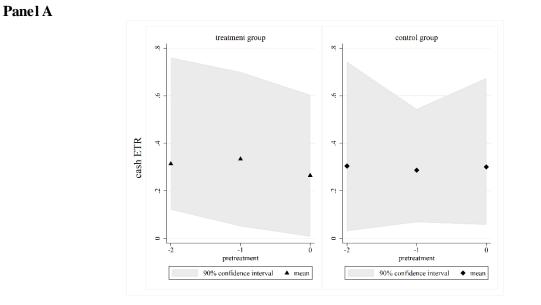
This figure maps networks and the investing firms from our sample (for networks of two partners). Each vertex (square) displays a firm in its classification as low-tax (black vertices) or high-tax (gray vertices). A link between two gray vertices translates into an hightolow = 0 observation for both high-tax firms. Correspondingly, a link between a gray vertex and a black vertex translates into an hightolow = 1 observation for the high-tax firm. There are 324 firms each of which has one network observation in our sample. In contrast, there are 178 firms with > 1 investments.



Figure 4

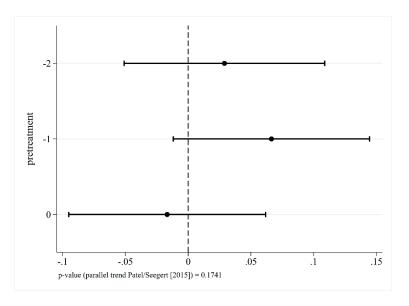
The word cloud depicted in Figure 3 shows the 40 most common words used in the SDC's deal description of the networks in our sample. By systematically searching through the deal descriptions, we identify *wholesale*, *licensing*, *marketing* and *manufacturing* activities as well as *research and development*, providing *services*, engaging in *supply functions* and *technology* as major business purposes of the networks in our sample. The respective indicator variables are included in equation (4). All variables are defined in detail in the Appendix.

Figure 5



Panel A of this figure provides visual evidence that the trend of cash ETR is similar for the treatment and control firms prior to the treatment.





In Panel B, we apply the approach of Patel and Seegert [2015] to provide statistical support for the parallel trend assumption. The figure reports the coefficient and 95% confidence interval of the interaction of the treatment indicator and embargo period fixed effects (with t_1 as baseline) for pretreatment years. The p-value for the parallel trend test is reported at the bottom of Panel B.

Tables

Table 1 Information on Networks and Firms

Panel A Descriptive	Statistics											
Ν		201			627			198			66	
hightolow		== 1			== 0							
lowtohigh								== 1			== 0	
	mean	p50	SD	mean	p50	SD	mean	p50	SD	mean	p50	SD
pre cash ETR3	0.3039	0.2631	0.1789	0.2856	0.2637	0.1341	0.0900	0.0862	0.0532	0.0976	0.0924	0.0632
cash ETR3	0.2557	0.2341	0.1874	0.2804	0.2449	0.1936	0.1557	0.1359	0.1493	0.1631	0.1475	0.1108
delta cash ETR3	- 0.0411	- 0.1005	0.6658	0.0871	- 0.0446	0.8096	1.0424	0.2530	2.4787	1.7487	0.3520	3.7796
change cash ETR3	- 0.0481	- 0.0267	0.2337	- 0.0051	- 0.0117	0.2103	0.0657	0.0376	0.1480	0.0655	0.0355	0.1263
EBITDA3	0.1551	0.1504	0.0705	0.1606	0.1517	0.0768	0.1321	0.1255	0.0607	0.1273	0.1279	0.0498
RnDExp3	0.0741	0.0517	0.0766	0.0677	0.0475	0.0745	0.0965	0.0834	0.0869	0.1193	0.1208	0.0917
AdExp3	0.0172	0.0036	0.0271	0.0145	0.0000	0.0255	0.0112	0.0000	0.0260	0.0132	0.0018	0.0244
SGA3	0.2671	0.2720	0.1826	0.2719	0.2613	0.1798	0.3099	0.3052	0.2038	0.3847	0.3704	0.2296
CapEx3	0.1300	0.1159	0.0754	0.1365	0.1170	0.0866	0.1498	0.1382	0.0902	0.1487	0.1368	0.0705
GrowthSale3	0.0386	0.0275	0.0867	0.0484	0.0267	0.1047	0.0572	0.0484	0.1088	0.0587	0.0447	0.0871
Leverage3	0.1911	0.1977	0.1347	0.1932	0.1914	0.1563	0.1781	0.1318	0.1959	0.1674	0.1531	0.1638
Cash3	0.1797	0.1254	0.1572	0.1725	0.1154	0.1626	0.2448	0.2179	0.1989	0.2901	0.2460	0.2273
MNE3	0.6169	1.0000	0.4874	0.6411	1.0000	0.4800	0.6667	1.0000	0.4726	0.6818	1.0000	0.4693
NOL3	0.2786	0.0000	0.4494	0.2823	0.0000	0.4505	0.3889	0.0000	0.4887	0.2879	0.0000	0.4562
Intangibles3	0.1909	0.1577	0.1692	0.1765	0.1067	0.1877	0.1509	0.0864	0.1626	0.1251	0.0698	0.1450
PPE3	0.3958	0.3112	0.2821	0.4141	0.3244	0.3232	0.3165	0.2194	0.2785	0.2947	0.2326	0.2381
Size3	9.8628	10.6128	2.0736	9.6368	10.0497	2.0674	9.3460	9.5647	2.0564	9.2779	9.0031	2.1442

. 1 . . T

Panel A of Table 1 shows descriptive statistics for our tax knowledge proxies and *firm controls* in t_1 (year of network initiation). The number of observations equals one observation per firm, which covers the first three years after the initiation of a strategic alliance. The firm controls are constructed as multiperiod measures $[t_1; t_3]$. In specifications with change cash ETR3 as dependent variable, first differences of continuous firm controls are applied. All variables are defined in detail in the Appendix.

Table 1 Information on Networks and Firms (continued)

Panel B Partner and Network Controls

	Partner Controls					Network Controls (Purpose_)						
n (mean)	SameAuditor	SameInd	SameBEARegion	Proximity	Wholesale	R&D	Licensing	Service	Marketing	Supply Chain	Manufacturing	Technology
hightolow == 1	44 (0.2189)	81 (0.4030)	45 (0.2239)	(-1233)	24 (0.1194)	51 (0.2537)	30 (0.1493)	7 (0.0348)	51 (0.2537)	16 (0.0796)	30 (0.1493)	81 (0.4030)
hightolow == 0	122 (0.1946)	260 (0.4147)	130 (0.2073)	(-1187)	30 (0.0478)	179 (0.2855)	112 (0.1786)	26 (0.0415)	158 (0.2520)	44 (0.0702)	40 (0.0638)	315 (0.5024)
lowtohigh == 1	44 (0.2222)	81 (0.4091)	46 (0.2323)	(-1247)	24 (0.1212)	50 (0.2525)	30 (0.1515)	7 (0.0354)	51 (0.2576)	15 (0.0758)	29 (0.1465)	80 (0.4040)
lowtohigh == 0	18 (0.2727)	38 (0.5758)	28 (0.4242)	(-917)	4 (0.0606)	16 (0.2424)	6 (0.0909)	2 (0.0303)	30 (0.4545)	0 (0)	6 (0.0909)	34 (0.5152)

Panel C Industry Affiliation of Networks and Firms [two-digit SIC-code]

						In	dustry of	Networks	s (Network	-Firm Obs	ervations)				Σ
			Ι	П	Ш	IV	v	VI	VII	VIII	IX	Х	XI	XII	
	Agriculture, Forestry, & Fishing [01-09]	Ι	0	0	0	1	0	1	0	0	0	0	1	0	3
	Mining [10-14]	П	0	6	0	1	2	0	2	0	0	0	1	0	12
	Construction [15-17]	III	0	0	0	0	0	3	0	0	0	0	1	0	4
	Manufacturing: Chemical & Allied Products [28]	IV	0	0	0	23	10	0	19	0	13	5	32	0	102
rms	Manufacturing [20-39, except 28]	V	0	4	2	12	110	16	30	3	42	109	43	7	378
of Fii	Transportation & Public Utilities [40-49]	VI	0	3	2	0	3	28	3	0	2	29	9	2	81
ıstry	Wholesale Trade [50-51]	VII	0	1	0	0	2	2	15	1	1	7	5	0	34
Indı	Retail Trade [52-59]	VIII	0	0	0	0	4	3	9	1	5	10	3	2	37
	Finance, Insurance, & Real Estate [60-67]	IX	0	0	0	0	1	0	2	0	19	18	5	3	48
	Services: Business Services [73]	Х	0	0	0	0	25	8	9	3	25	231	24	2	327
	Services [70-89, except 73]	XI	0	0	0	0	1	2	2	0	2	7	14	0	28
	Nonclassifiable Establishments/Other	XII	0	0	0	3	4	5	1	0	3	15	7	0	38
			0	14	4	40	162	68	92	8	112	431	145	16	1092

Panel B of Table 1 shows the distribution of the partner & network control variables among hightolow and lowtohigh observations. The variable Proximity is standardized for regression analyses. Panel C of Table 1 presents information regarding the industry affiliation of networks and firms. Industry affiliation is determined on a two-digit SIC-code basis. All variables are defined in detail in the Appendix.

Table 2 Descriptive Analysis

Ν		2	201	e	527			
hightolow		=	= 1	== 0				
		mean	(SD)	mean	(SD)			
pre cash ETR3 $[t_{-2};t_0]$	Ι	0.3039	(0.1789)	0.2856	(0.1341)			
$cash ETR3[t_1;t_3]$	II	0.2557	(0.1874)	0.2804	(0.1936)			
Before After Change	I to II	- 0.0481	***	- 0.0051				
(SE)		(0.0	(0.0165)		0084)			
Difference in Differences		- 0.0430**						
(SE)			(0.0	175)				

Panel A Change from pre cash ETR3 $[t_{-2};t_0]$ to cash ETR3 $[t_1;t_3]$

Panel B Differences in <i>delta cash ETR</i> 3 and <i>change cash ETR</i> 3								
hightolow	==1	==0	difference	(SE)				
- mean delta cash ETR3	- 0.0411	0.0871	- 0.1282**	(0.0630)				
- p50 delta cash ETR3	- 0.1005	- 0.0446	- 0.0560*	(0.0329)				
- p50 change cash ETR3	- 0.0267	- 0.0117	- 0.0150*	(0.0081)				

All variables are defined in detail in the Appendix. Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. We follow Conroy [2012] and apply quantile regression to test for the differences in medians in Panel B. The results of these tests are robust to using (i) Mann-Whitney/Wilcoxon rank-sum and (ii) K-sample equality-of-medians tests (untabulated).

Dependent Variable	cash El	TR3	delta casi	h ETR3	change cas	sh ETR3	
-	Coefficient	(SE)	Coefficient	(SE)	Coefficient	(SE)	
hightolow	- 0.0278**	(0.0141)	- 0.1301**	(0.0526)	- 0.0465***	(0.0171)	
Proximity	- 0.0017	(0.0065)	- 0.0192	(0.0293)	- 0.0139*	(0.0074)	
SameAuditor	- 0.0048	(0.0154)	0.0342	(0.0619)	0.0144	(0.0171)	
EBITDA3	- 0.6078***	(0.1880)	- 1.7484***	(0.5943)	- 0.5162**	(0.2383)	
RnDExp3	0.1396	(0.1835)	1.1304	(0.8668)	0.2258	(0.4751)	
AdExp3	0.2153	(0.3439)	- 0.2850	(1.1296)	1.8520	(1.4296)	
SGA3	- 0.0080	(0.0682)	0.3059	(0.3048)	0.4390	(0.2726)	
CapEx3	- 0.1320	(0.1686)	- 0.0899	(0.5790)	0.2803	(0.2294)	
GrowthSale3	- 0.3495**	(0.1362)	- 1.4437***	(0.5173)	- 0.2668***	(0.0862)	
Leverage3	- 0.2090**	(0.0884)	- 0.6533**	(0.3024)	- 0.0240	(0.1442)	
Cash3	- 0.1190	(0.1154)	- 0.8412*	(0.4491)	0.2615	(0.1627)	
MNE3	0.0210	(0.0198)	0.1115	(0.0842)	0.0459**	(0.0232)	
NOL3	0.0205	(0.0224)	0.0277	(0.0870)	0.0165	(0.0235)	
Intangibles3	0.0641	(0.0656)	0.2477	(0.2302)	0.2058	(0.1496)	
PPE3	0.0698	(0.0587)	0.2123	(0.1813)	0.0375	(0.1394)	
Size3	- 0.0108*	(0.0056)	- 0.0173	(0.0187)	- 0.0602**	(0.0252)	
PurposeWholesale	0.0123	(0.0271)	- 0.0041	(0.1223)	- 0.0358	(0.0338)	
PurposeR&D	- 0.0160	(0.0130)	- 0.1131**	(0.0573)	- 0.0409**	(0.0159)	
PurposeLicensing	- 0.0021	(0.0181)	0.0174	(0.0782)	- 0.0076	(0.0219)	
PurposeService	- 0.0366	(0.0422)	- 0.1344	(0.1300)	- 0.0314	(0.0354)	
PurposeMarketing	- 0.0014	(0.0179)	0.0162	(0.0861)	0.0115	(0.0204)	
PurposeSupply	- 0.0104	(0.0298)	- 0.0464	(0.1089)	- 0.0067	(0.0322)	
PurposeManufacturing	0.0296	(0.0216)	- 0.0131	(0.0863)	0.0001	(0.0289)	
PurposeTech	- 0.0022	(0.0160)	0.0239	(0.0576)	- 0.0271	(0.0186)	
Intercept	0.5132***	(0.0705)	0.5342**	(0.2411)	- 0.0265	(0.0219)	
Firm Controls					First Differ	rences	
Fixed Effects	Industry &	Year	Industry &	x Year	Industry &	Year	
SE	Cluster @	Firm	Cluster @	Firm	Cluster @ Firm		
N	828		828		828		
Adjusted R^2	0.122	24	0.110)8	0.122	.1	

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. The results for equation (4) are presented in Panel A. Our focal variable of interest is *hightolow*, which is an indicator variable set equal to 1 for observations of high-tax firms cooperating with low-tax firms and set equal to 0 for high-tax firms cooperating with high-tax firms. All variables are defined in detail in the Appendix.

Table 3 Main Analysis (continued)

Panel B Difference in Differences

Dependent Variable	cash	ETR	cash l	ETR		
Embargo Period	Yes $[t$	$_{2};t_{5}]$	Yes $[t$	₂ ; t ₅]		
Entropy Balancing	-		Balanced	Sample		
	Coefficient	(SE)	Coefficient	(SE)		
treated	0.0057	(0.0166)	0.0149	(0.0184)		
treated * post	- 0.0361*	(0.0212)	- 0.0486**	(0.0237)		
Controls	Partner & N	letwork &	Partner & Network &			
Controls	Firm (Annu	al Levels)	Firm (Annua	al Levels)		
Fixed Effects	Industry &	x Year &	Industry &	Year &		
FIXED Effects	Embargo	Period	Embargo	Period		
SE	Cluster (@ Firm	Cluster @ Firm			
Ν	194	5	1945			
Adjusted R^2	0.05	516	0.0686			

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. Panel B depicts the results for equation (5). We create an embargo period around a network observation during which a firm may not invest in another network (exclusion of overlapping events). The embargo period contains the three years preceding (post = 0) and five years subsequent (post = 1) to a network initiation. The exclusion of overlapping events deflates treatment and control observations, while measuring annual levels of variables over time ($[t_{-2}; t_5]$, DiD) inflates the sample in comparison to measuring multiperiod variables at a point in time ($[t_1]$, Panel A). This approach leads to n = 1,945. Including *embargo period* fixed effects subsumes the *post* indicator. In the second specification, we employ entropy-balancing weighting and use the entropy weights to reestimate equation (5). Observations are balanced using continuous *firm controls* so that the variables' means and variances in the reweighted control group match the treatment group (balanced sample). All variables are defined in detail in the Appendix.

Dynamic Treatment Effec	ts	
Dependent Variable	cash ETR	
Embargo Period	Yes $[t_{-2}; t_5]$	
Entropy Balancing	Balanced Samp	ble
(#) of Specification	Coefficient	(SE)
(1) treated $*$ post $[t_1]$	- 0.0415	(0.0347)
(2) treated $* post [t_1; t_2]$	- 0.0569**	(0.0277)
(3) <i>treated</i> $*$ <i>post</i> $[t_1; t_3]$	- 0.0461*	(0.0242)
(4) treated $*$ post $[t_1; t_4]$	- 0.0495**	(0.0243)
(5) <i>treated</i> $*$ <i>post</i> $[t_1; t_5]$	- 0.0486**	(0.0237)
Controls	Partner & Network & Firm (Annu	al Levels) & Treated
Fixed Effects	Industry & Year & Emb	argo Period
SE	Cluster @ Firr	n
Ν	1120; 1363; 1579; 17	70; 1945
Adjusted R^2	0.0598; 0.0689; 0.0701; 0.	.0662; 0.0686

Table 4 Facilitators: Elapsed Time

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. This table depicts the results for five specifications of equation (5) in which dynamic treatment effects are considered by binning posttreatment periods. The posttreatment period is extended by one year for each specification (from post = 1 for $[t_1]$ to post = 1 for $[t_1; t_5]$). post equals 0 for t_{-2} to t_0 throughout all specifications. The coefficient estimates of treatment * post comprise the cumulative adjustment (i.e., effect of elapsed time) of a high-tax firm's tax planning behavior with progressing time when cooperating with low-tax firms. All variables are defined in detail in the Appendix.

Table 5 Facilitators: Distance, Industry, Audit Firm

Panel A Distance

Dependent Variable	cash I	ETR3	change ca	sh ETR3	
	Coefficient	(SE)	Coefficient	(SE)	
hightolow	- 0.0272*	(0.0164)	- 0.0350**	(0.0174)	
SameBEARegion	- 0.0144	(0.0211)	- 0.0369*	(0.0220)	
hightolow * SameBEARegion	- 0.0021	(0.0370)	- 0.0466	(0.0516)	
Controls	Partner & Net	work & Firm	Partner & Netw	ork & Firm	
Fixed Effects	Industry	& Year	Industry &		
SE	Cluster (@ Firm	Cluster @	Firm	
N	82	8	828		
Adjusted R ²	0.12	221	0.126	57	
Panel B Industry					
Dependent Variable	cash E	ETR3	change cas	sh ETR3	
	Coefficient	(SE)	Coefficient	(SE)	
hightolow	- 0.0414**	(0.0184)	- 0.0436**	(0.0216)	
SameInd	- 0.0200	(0.0163)	- 0.0160	(0.0178	
hightolow * SameInd	0.0317	(0.0321)	0.0007	(0.0343	
Controls	Partner & Net	work & Firm	Partner & Netw	ork & Firm	
Fixed Effects	Yea	ar	Year		
SE	Cluster (@ Firm	Cluster @	Firm	
N	828	3	828		
Adjusted R ²	0.12	.72	0.118	8	
Panel C Audit Firm					
Dependent Variable	cash E	TR3	change cas	sh ETR3	
	Coefficient	(SE)	Coefficient	(SE)	
hightolow	- 0.0356**	(0.0167)	- 0.0555***	(0.0199)	
SameAuditor	- 0.0146	(0.0169)	0.0029	(0.0184)	
hightolow * SameAuditor	0.0370	(0.0340)	0.0437	(0.0541)	
Controls	Partner & Netw	vork & Firm	Partner & Netw	ork & Firm	
Fixed Effects	Industry &	z Year	Industry & Year		
SE	Cluster @		Cluster @ Firm		
N	828		828		
Adjusted R^2	0.122	24	0.122	2	

Superscripts ***, ** and * indicate significance at the 1%,5% and 10% levels, respectively, for two-tailed tests. In Panel A, we test for the impact of geographical distance between the headquarters of cooperating firms. Distance is measured by an indicator variable that is set equal to one if network partners are headquartered in the same region, as defined by the Bureau of Economic Analysis, at network initiation. Panel B (Panel C) follows the approach of Panel A for the industry affiliation (shared audit firm) of network partners. For specification with *change cash ETR3*as the dependent variable, first differences of continuous *firm controls* are employed. All variables are defined in detail in the Appendix.

Table 6 Additional Analyses: Effects on Reporting of Operations

Dependent Variable	Sentin	nent	Use o Negative		Use Tax H		Delav Strat	
Embargo Period Entropy Balancing	Yes $[t$	₂ ;t ₅]	Yes $[t_{-2}]$	2; t ₅]	Yes [<i>t</i> _	$_{-2};t_{5}]$	Yes [t.	$_{-2};t_{5}]$
	Coefficient	(SE)	Coefficient	(SE)	Coefficient	(SE)	Coefficient	(SE)
treated	0.0005	(0.0007)	- 0.0001	(0.0006)	- 0.0079	(0.0615)	- 0.0137	(0.0770)
treated * post	- 0.0013**	(0.0006)	0.0012***	(0.0005)	- 0.0521	(0.0513)	0.0460	(0.0655)
Controls	Partner & Network & Firm (Annual Levels)		Partner & Ne Firm (Annua		Partner & N Firm (Annu		Partner & N Firm (Annu	
Fixed Effects	Industry &		Industry &		Industry &		Industry &	
SE	Embargo Cluster @	🦻 Firm	Cluster @	Embargo Period Cluster @ Firm		PeriodØ Firm	Embargo Period Cluster @ Firm	
N Adjusted R^2	164 0.18		1641 0.246		1712 0.2790		1313 0.2949	

Textual Sentiment of 10-K Filings & Tax Haven Operations

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. Table 4 depicts the results for equation (5) with measures of textual sentiment of 10-K filings (*Sentiment*, *Use of Negative Words*) and Tax Haven Operations (*Use of Tax Haven, Num of Tax Haven Subsidiaries*) from Exhibit 21 disclosures as dependent variables. Data on textual sentiment (Exhibit 21 disclosures) are shared publicly by Bill McDonald (Scott Dyreng). All variables are defined in detail in the Appendix.

Tax Knowledge Diffusion via Strategic Alliances

Online Supplement

August 2021

1. Robustness Checks

1.1 FALSIFICATION TESTS

1.1.1 Low-Tax Firms

Table OS 1

Effect on low-tax Firms						
Dependent Variable	cash ETR3		change cash ETR3			
	Coefficient	(SE)	Coefficient	(SE)		
lowtohigh	- 0.0227	(0.0205)	- 0.0044	(0.0180)		
Proximity	- 0.0013	(0.0095)	0.0055	(0.0082)		
SameAuditor	- 0.0065	(0.0209)	- 0.0157	(0.0169)		
Network Controls	Yes		Yes			
Firm Controls	Ye	Yes		Yes		
Fixed Effects	Industry & Year		Industry & Year			
SE	Cluster @ Firm		Cluster @ Firm			
Ν	261		261			
Adjusted R^2	0.0864		0.14	49		

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests.

Our main analysis identifies tax knowledge diffusion for high-tax firms via low-tax networks. We do not consider the tax positions of low-tax firms because there is little reason to expect incremental tax knowledge diffusion/negative tax effects for low-tax firms bound to high-tax firms. To empirically control for this notion, we construct *lowtohigh*, which is an indicator that equals one for low-tax firms in networks with high-tax firms and zero for low-tax firms in low-tax networks. The results for this specification are presented in Table OS 1. The coefficient estimates (Table OS 1) for *lowtohigh* are (i) beyond common levels of significance and (ii) economically not meaningful different from zero.

1.1.2 Placebo hightolow

Dependent Variable	са	cash ETR3			change cash ETR3		
-	Coefficient	(SE)	[p-value]	Coefficient	(SE)	[p-value]	
Average Coefficient	0.0009			0.0011			
Average SE	(0.0175)		(0.0190)				
Average p-value	[0.5000]				[0.4798]		
Controls	Partner & Network & Firm		Partner & Network & Firm (First Differences		st Differences)		
Fixed Effects	Industry & Year		Industry & Year				
SE	Cluster @ Firm		Cluster @ Firm				
Ν	1000 x 627		1000 x 627				

Table OS 2

Table OS 2 depicts results of placebo tests. We create the indicator variable *placebo-hightolow*, which is 1000 times randomly assigned among observations of *hightolow* = 0 but within the initial proportions of *hightolow*. We then estimate equation (4) with (*change*) *cash ETR*3 as the dependent variables. The averages of the coefficient estimates are economically marginally different from zero with large standard errors and the average p-values are beyond common levels of significance but match (approach) 0.5. A full display of the estimated coefficients is available at the GitHub repository.

1.2 TWO WAY FIXED EFFECTS

Table O	S 3	3
---------	-----	---

Interaction Weighted Two Way Fixed Effects							
Dependent Variable	cash ETR		cash ETR				
Specification	bins pre & post		fully dynamic post				
	Coefficient	(SE)	Coefficient	(SE)			
pretreatment bin $[t_{-2};t_{-1}]$	0.0176	(0.0193)	0.0178	(0.0193)			
baseline period t _o	0.0000	-	0.0000	-			
posttreatment bin $[t_1; t_5]$	- 0.0259*	(0.0142)					
post t ₁			- 0.0239	(0.0174)			
post t_2			- 0.0340*	(0.0190)			
$post t_3$			- 0.0321*	(0.0194)			
$post t_4$			- 0.0306	(0.0231)			
post t ₅			- 0.0082	(0.0266)			
Firm Controls	Yes (Annual	Measures)	Yes (Annual	Measures)			
Fixed Effects	Firm & Year		Firm & Year				
SE	Cluster @ Firm		Cluster @ Firm				
Ν	6911		6911				
Adjusted R ²	0.2015		0.2000				

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests.

In Table OS 3 we implement an interaction weighted two way fixed effects estimator under consideration of the recent advances by Sun and Abraham [2020]. The authors show that estimates of relative time indicators in event studies (i.e., settings with variation in treatment timing across units) can be contaminated when heterogenous treatment effects are present. We follow Sun and Abraham and generate relative time indicators to our treatment variable hightolow = 1. We treat our control group (hightolow = 0) as never treated units. We leave out distant leads and lags of the treated units to create pretreatment and posttreatment periods ($[t_{-2}; t_5]$ with treatment in t_1). We bin observations in the pretreatment and posttreatment periods relative to the last relative year before the treatment occurs (t_0 as baseline) in specification (1). In specification (2), we employ a fully dynamic posttreatment period. We then estimate a linear model with firm α_i and time λ_t fixed effects and include interaction weighted relative time periods $\delta_{e,l}$ to the treatment using eventstudyinteract by Sun (<u>https://github.com/lsun20/eventstudyinteract</u>). We include annual levels of *firm controls* and cluster robust standard errors at the firm level:

$$cash ETR_{i,t} = \alpha_i + \lambda_t + \sum_l \delta_{e,l} * treated_{it}^l + \sum_k \beta_k firm \ controls_{i,t}^k + \varepsilon_{i,t}$$
(OS 2)

The results of estimating equation (OS 2) suggest that our analyses are robust to potential contamination of two way fixed effects estimators. The coefficient estimates and standard errors show that the posttreatment (pretreatment) bin is (not) statistically significantly different from the baseline period t_0 . Furthermore, the estimates from the second specification underline the importance of elapsed time for tax knowledge diffusion to occur. We interpret the results to corroborate our identification strategy and main analysis.

1.3 ALTERNATIVE IDENTIFICATION STRATEGY

Dependent Variable	cash ETR3		
	Coefficient	(SE)	
pre cash ETR3	0.3952***	(0.0700)	
adj. partner pre cash ETR3	- 0.0953	(0.0690)	
pre cash ETR3 * adj.partner pre cash ETR3	0.7744**	(0.3588)	
Proximity	- 0.0066	(0.0049)	
SameAuditor	- 0.0095	(0.0126)	
Network Controls	Yes		
Firm Controls	Yes		
Fixed Effects	Industry		
SE	Cluster @ Firm		
N	1092		
Adjusted R^2	0.1686		

Table OS 4

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. To alleviate potential concerns about our identification strategy, we apply a modified identification strategy to check our strategy's robustness. We enter high-tax and low-tax firms in a specification of equation (4) and regress *cash ETR3* on firms' own *pre cash ETR3*, on the industry-year-mean adjusted *partner pre cash ETR3*, and on an interaction term of the two independent variables:

 $cash ETR3_{i,t=1} = \beta_0 + \beta_1 pre cash ETR3_{i,t=0} + \beta_2 adj.partner pre cash ETR3_{i,t=0}$

$+\beta_3$ pre cash ETR3 * adj.partner pre cash ETR3

$$+\sum_{n} \beta_{n} \text{ network controls}_{i,t=1}^{n} + \sum_{n} \beta_{l} \text{ partner controls}_{i,t=1}^{l}$$

$$+\sum_{k} \beta_{k} \text{ firm controls}_{i,t=1}^{k} + \delta_{ind} + \varepsilon_{i,t}$$
(OS 1)

The results suggest that our identification strategy and our results are not sensitive to the classification of firms based on quartilebins when classifying *hightolow*. Table OS 1 further indicates that the effects for low-tax firms are negligible.

1.4 ALTERNATIVE TAX KNOWLEDGE MEASURE

Table OS 5

Panel A DiD: CTD			Panel B Baseline Regression: change CTD3		
Dependent Variable	СТД		Dependent Variable	change CTD3	
Embargo Period	Yes [t-2;t5]				
Entropy Balancing	Balanced S	Sample		Coefficient	(SE)
	Coefficient	(SE)	hightolow	- 0.0038**	(0.0018)
treated	0.0034	(0.0022)	hightolow	- 0.0030	(0.0010)
treated * post	- 0.0067** (0.0026)	(0.002()	Proximity	- 0.0010	(0.0007)
		(0.0020)	SameAuditor	0.0004	(0.0014)
Partner & Network &		Controls	Network &		
Controls	Firm (Annual Levels)		Controls	Firm (First Differences)	
Fixed Effects	Industry & Year & Embargo Period		Fixed Effects	Industry & Year	
SE	Cluster @ Firm		SE	Cluster @ Firm	
Ν	2063		Ν	726	
Adjusted R^2	0.3261		Adjusted R^2	0.1870	

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. We apply the measure (*CTD*) developed by Henry and Sansing [2018] to identify whether high-tax firms become rather tax-favored relative to the control observations. The results of these tests support the identified effects in the main analysis.

1.5 ALTERNATIVE ENTROPY WEIGHTS

Table OS 6

Difference in Differences: A	ternative Entropy Weigh	ts				
Dependent Variable	cash ETR		cash ETR			
Embargo Period	Yes $[t_{-2}; t_5]$		Yes $[t_{-2}; t_{5}]$			
Alternative Entropy Weights	Treatment Per	riod $[t_1]$	Pretreatment Average $[t_{-2}; t_0]$			
	Coefficient	(SE)	Coefficient	(SE)		
treated	0.0075	(0.0167)	0.0048	(0.0168)		
treated * post	- 0.0428*	(0.0227)	- 0.0405*	(0.0225)		
Controls	Partner & Network & Fir	rm (Annual Levels)	Partner & Network & Fi	rm (Annual Levels)		
Fixed Effects	Industry & Year & Embargo Period		Industry & Year & Embargo Period			
SE	Cluster @ Firm		Cluster @ Firm			
Ν	1945		1945			
Adjusted R^2	0.066	0.0661		0.0602		

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests. In our main analysis we balance covariates on two moments over the full embargo period. We check the robustness of this approach by balancing the covariates (i) in the treatment period t_1 (e.g., see Gallemore et al. [2019]), and (ii) on the firm-average of the first momentum in the pretreatment period. Our results remain statistically and economically robust.

1.6 ALTERNATIVE EXPLANATIONS

Table OS 7

Panel A Exclude Nonsurvivors			Panel B Effect on Profitability			
Dependent Variable	change cash ETR3		Dependent Variable	change EBITDA/AT3		
Specification	exclude nonsurvivors		Specification	First Differe	ence ROA	
	Coefficient	(SE)		Coefficient	(SE)	
hightolow	- 0.0518***	(0.0181)	hightolow	0.0044	(0.0051)	
Proximity	- 0.0086	(0.0077)	Proximity	0.0007	(0.0018)	
SameAuditor	0.0146	(0.0205)	SameAuditor	0.0019	(0.0042)	
Network Controls	Yes		Network Controls	Ye	s	
Firm Controls	First Differences		Firm Controls	First Differences		
Fixed Effects	Industry & Year		Fixed Effects	Industry & Year		
SE	Cluster @ Firm		SE	Cluster @ Firm		
Ν	660		Ν	828		
Adjusted R^2	0.1914		Adjusted R^2	0.4051		

Superscripts ***, ** and * indicate significance at the 1%, 5% and 10% levels, respectively, for two-tailed tests.

In Panel A of Table OS 7 we exclude firm-edge-years from the analysis (i.e., firms with network-firm observations within the last three years of their presence in our panel) because prior research indicates that strategic alliances can serve as preliminary ties between successive acquirers and targets (Ishii and Xuan [2014], Porrini [2004]). This approach also ensures that variation in cash ETR3 does not stem from the substitution with cash ETR for the final and penultimate firm-year of a firm in our panel.

Panel B of Table OS 7 depicts results for estimating equation (4) with the first difference of ROA (*change EBITDA/AT3*) as dependent variable. The estimate for *hightolow* is beyond common levels of statistical significance and economically small. This strenghtens our main result as a tax effect rather than an effect on profitability.

2. References Online Supplement

GALLEMORE, J; B. GIPPER; AND E. L. MAYDEW. "Banks as Tax Planning Intermediaries." Journal of Accounting Research 57 (1) (2019): 169–209.

HENRY, E., AND R. SANSING. "Corporate Tax Avoidance: Data Truncation and Loss Firms." *Review of Accounting Studies* 23 (3) (2018): 1042–1070.

ISHII, J., AND Y. XUAN. "Acquirer-target social ties and merger outcomes." Journal of Financial Economics 112 (3) (2014): 344–363.

PORRINI, P. "Can a Previous Alliance Between an Acquirer and a Target Affect Acquisition Performance?" *Journal of Management* 30 (4) (2004): 545–562.

SUN, L., AND S. ABRAHAM. "Estimating dynamic treatment effects in event studies with heterogeneous treatment effects." *Journal of Econometrics* (2020).

Impressum:

Arbeitskreis Quantitative Steuerlehre, arqus, e.V. Vorstand: Prof. Dr. Ralf Maiterth (Vorsitzender), Prof. Dr. Kay Blaufus, Prof. Dr. Dr. Andreas Löffler Sitz des Vereins: Berlin

Herausgeber: Kay Blaufus, Jochen Hundsdoerfer, Martin Jacob, Dirk Kiesewetter, Rolf J. König, Lutz Kruschwitz, Andreas Löffler, Ralf Maiterth, Heiko Müller, Jens Müller, Rainer Niemann, Deborah Schanz, Sebastian Schanz, Caren Sureth-Sloane, Corinna Treisch

Kontaktadresse:

Prof. Dr. Caren Sureth-Sloane, Universität Paderborn, Fakultät für Wirtschaftswissenschaften, Warburger Str. 100, 33098 Paderborn, www.arqus.info, Email: info@arqus.info

ISSN 1861-8944