

## **CURRICULUM VITAE**

**SOLOMON PICCIOTTO.**

**DATE OF BIRTH: 14.4.1942**

**NATIONALITY: UK**

**PRESENT POSITION:**

Emeritus Professor of Law, Lancaster University, U.K.

Senior Fellow, International Centre for Tax and Development, Institute of Development Studies, Brighton (UK).

Honorary Professor, School of Law, Warwick University, UK.

Senior Research Fellow, Institute of Advanced Legal Studies, University of London, UK.

Senior Adviser, Tax Justice Network.

**PREVIOUSLY:**

Lecturer in Law, University College, Dar es Salaam 1964-8.

Lecturer in Law, University of Warwick, 1968-1979; Senior Lecturer, 1980-92.

Professor of Law, Lancaster University, 1992-2007.

Chairman, School of Law, University of Warwick, 1982-85; 1988-1990.

Head, Department of Law, Lancaster University, 1992-5; Head, Lancaster University Law School, 2000-2003.

Scientific Director, Onati International Institute for the Sociology of Law (1/9/09-31/8/11)

**VISITING POSTS:**

Visiting Professor, Nagoya University, Japan, May-June 1986.

Jean Monnet Fellow, European University Institute, Florence, 1991-1992.

Visiting Research Fellow, Centre for Tax System Integrity, Australian National University, February-March 2004.

Visiting Professor, Auckland University Law School, April 2008.

Visiting Professorial Fellow, University of New South Wales Faculty of Law, February-March 2012.

Visiting Professor, Centre for Law, Regulation and Governance of the Global Economy (GLOBE), School of Law, University of Warwick, 2018-

## **EDUCATION:**

Foundation Scholar, The Manchester Grammar School, 1953-1960.  
Somerset Thornhill Scholar, Brasenose College, Oxford, 1960-3.  
Commonwealth Fellow, University of Chicago School of Law, 1963-4.

B.A. (Jurisprudence), University of Oxford, 1963, First Class.  
J.D. University of Chicago, 1964, Summa Cum Laude.

## **LANGUAGES**

English (main); French (fluent); Spanish, Italian, German (competent).

## **GRANTS**

International Centre for Tax and Development, Senior Fellow and coordinator of the international tax research programme, funded by the Bill and Melinda Gates Foundation, 2016-8. (Total grant of \$1.9m covering three programmes under the general title of *Achieving More Equitable and Efficient Tax Systems in Africa*).

International Centre for Tax and Development, one of three lead researchers on program on *Revenue Enhancement in Developing Economies*, August 2014 - March 2016, £140,000.

International Centre for Tax and Development, funding of £155,000 for 8 projects, for which I was overall coordinator, on *Unitary Taxation of Transnational Corporations with Special Reference to Developing Countries*, April 2013-May 2014.

The Economic and Social Research Council, Research Fellowship award of £174,239 for a research programme on *Regulatory Networks and Global Governance*, 2004-7.

The Leverhulme Trust, grant of £44,640 to study "International regulatory implications of the globalisation of futures markets" 1996-8

The Nuffield Foundation, grant of £3,000 to study "The mediation and coordination of international business regulation", 1991-2.

The Nuffield Foundation, grant of £1,000 to organise Workshop on Corporate Control and Accountability, July 1991.

The Nuffield Foundation, grant of £3,000 to study "The coordination of jurisdiction to regulate international business" 1984-6.

The Japan Society for the Promotion of Science, grant of £4,000 for a 4-week visit to Japan, May-June 1986.

## **SELECTED CONSULTANCIES, EVALUATIONS & ADVICE**

Member of Centre Advisory Group, International Centre for Tax and Development, 2010-

Member of Copyright Group (now Copyright Negotiating and Advisory Committee) of Universities UK and Guild HE, 2000-.

Advisory Board member, EU Horizon 2020 research project *Combating Fiscal Fraud and Empowering Regulators* (COFFERS), 2017-2019.

Advisory Group member of the research project *Curbing Illicit Financial Flows from Resource-rich Developing Countries: Improving Natural Resource Governance to Finance the SDGs* of the Swiss National Science Foundation 2017-2020.

Member of High-Level Group for the S&D Group of the European Parliament on the report *Fair and Efficient Taxation in the European Union in a Global Context*, 2018-9.

Expert Adviser to the Consultancy on Intellectual Property Rights for the Joint Informations Systems Committee (JISC), October 2005-September 2007.

Consultant to the United Nations Conference on Trade and Development (UNCTAD), and to the Association for Pacific Economic Cooperation (APEC) on international investment regulation, 2002-4.

Consultant to the United Nations Conference on Trade and Development (UNCTAD) for its Issues papers Series on International Investment Agreements, in particular on *Social Responsibility* and *Transfer Pricing and Taxation*, 1999-2001.

Consultant to the Attorney General of the Cayman Islands on OECD proposals for information exchange for tax purposes, 1999-2000.

Evaluations of research proposals for The Nuffield Foundation, and the Economic & Social Research Council (occasional), 1986-.

#### **INSTITUTIONAL MANAGEMENT EXPERIENCE**

**Dar es Salaam:** Acting Dean, 1967; Law Faculty representative on Arts Faculty Board, 1966-8.

**University of Warwick:** Member of Senate, 1976-79, 1982-85  
Member of Council, University of Warwick 1983-5.  
Member at various times of Board of Faculty of Social Studies.  
Member of Senate's Academic Policy Committee 1989-90.

**Lancaster University:** Head of Department of Law 1992-5, and of Law School 2000-3; member of Senate 1992-5, 2000-3.

**Oñati International Institute for the Sociology of Law:** Scientific Director 2009-2011, member of Board 2009-2013.

#### **OTHER ACTIVITIES:**

Senior Adviser, Tax Justice Network, 2004-

Coordinator of the *International Business Regulation Forum*, a network of academics and non-governmental organisations, working on international business regulation issues, 1998-2002.

Co-ordinator of the *BEPS Monitoring Group*, 2013-

#### **MAIN PUBLICATIONS**

##### **SOLE-AUTHORED BOOKS.**

*Regulating Global Corporate Capitalism* Cambridge University Press 2011. xxix and 571pp.

*International Business Taxation* Weidenfeld & Nicolson/Butterworths 1992; xvi and 400pp.

#### **CO-AUTHORED AND EDITED BOOKS.**

Picciotto S. (ed.) *Taxing Multinational Enterprises as Unitary Firms*. International Centre for Tax and Development, 2017.

Corporate Reform Collective *Fighting Corporate Abuse. Beyond Predatory Capitalism*. Pluto Press 2014.

Campbell, David and Picciotto, Sol *New Directions in Regulatory Theory*. Blackwell 2002.

Mayne, Ruth and Picciotto, Sol *Regulating International Business. Beyond Liberalization*. Macmillan, 1999.

Bratton, W, McCahery, J., Picciotto, S. and Scott, C. *International Regulatory Competition and Coordination*, Clarendon Press, Oxford, 1996.

McCahery, J., Picciotto, S. and Scott, C. *Corporate Control and Accountability*, Clarendon Press, Oxford 1993.

Dewar, John, Paliwala, Abdul, Picciotto, Sol & Ruete, Matthias *Nuclear Weapons, the Peace Movement and the Law*, Macmillan 1986.

Holloway, John, and Picciotto, Sol *State and Capital* Edward Arnold 1978.

Faundez, Julio and Picciotto, Sol *The Nationalization of Multinationals in Peripheral Economies*, Macmillan 1978.

Picciotto, Sol *Negotiable Instruments in East Africa: Text and Materials*. Faculty of Law, Dar es Salaam 1967.

#### **JOURNAL ARTICLES.**

Picciotto, S. (2018), 'International tax, regulatory arbitrage and the growth of transnational corporations', *Transnational Corporations* 25(3). Special Issue on Investment and International Taxation (Part 2): 27-53.

Picciotto, S. (2018), 'Problems of Transfer Pricing and Possibilities for Simplification'. International Centre for Tax and Development. Working Paper 86.

Picciotto S. (2017) Regulation: Managing the Antinomies of Economic Vice and Virtue. *Social & Legal Studies* 26: 676–699.

Picciotto S. (2016) International Taxation and Economic Substance. *Bulletin for International Taxation* 70: 752-759.

Picciotto S. (2016) Critical Theory and Practice in International Economic Law and the New Global Governance. In: Bungenberg M, Herrmann C, Krajewski M, et al. (eds) *European Yearbook of International Economic Law 2016*. Cham: Springer International Publishing, 3-22.

- Picciotto, S. (2015) Indeterminacy, Complexity, Technocracy and the Reform of International Corporate Taxation, *Social & Legal Studies*, **24**, 165-84,  
<http://sls.sagepub.com/content/24/2/165.full.pdf?ijkey=L.VJeI8jCrDNVdrS&keytype=finite>
- Picciotto S. (2015) The UK's Diverted Profits Tax: An Admission of Defeat or a Pre-Emptive Strike? *Tax Notes International* 77: 239-242.
- Picciotto S. (2014) From Independent Entity Back to the Unitary Principle. *Tax Notes International* 73: 13-18.
- Picciotto S. (2013) Mediating Contestations of Private, Public and Property Rights in Corporate Capitalism. *Onati Socio-Legal Series* 3: 622-646,  
<http://ssrn.com/abstract=2340587>. Spanish version in *Sortuz. Oñati Journal of Emergent Socio-legal Studies* 6(1) 82-110.
- Picciotto S. (2013) "Can the OECD Mend the International Tax System?" *Tax Notes International* 71: 1105-1115.
- Picciotto, S. (2013). *Is the International Tax System Fit for Purpose?* Working Paper 13, International Centre for Tax and Development.
- Picciotto S. (2012) 'Towards Unitary Taxation'. Tax Justice Network.
- Picciotto S. (2011) 'Paradoxes of Regulating Corporate Capitalism: Property Rights and Hyper-Regulation' *Oñati Socio-Legal Series*, vol. 1, no. 2,  
<http://ssrn.com/abstract=1955893>
- Picciotto S. (2008) 'Constitutionalizing Multilevel Governance?' *I.Con International Journal of Constitutional Law* 6(3-4) 457-479.
- Picciotto S. (2007) 'Die Internationale Transformation des Staates' *Prokla. Zeitschrift des kritische sozialwissenschaftes*, 37(2): 251-272.
- Picciotto S. (2007) 'Constructing Compliance: Game-Playing, Tax Law and The Regulatory State' *Law & Policy* 29(1): 11-30.
- Campbell D. and Picciotto S. (2006) 'The Acceptable Face of Intervention: Intellectual Property in Posnerian Law and Economics' *Social & Legal Studies* 15(3): 455-472.
- Picciotto S. (2005) Review Article of *Jurisprudence for an interconnected globe*. *International Journal of Law in Context*, 1(4): 427-434
- Picciotto S. (2005) 'The WTO's Appellate Body: Legal Formalism as a Legitimation of Global Governance' *Governance* 18(3) 477-503. "Rights, Responsibilities and Regulation of International Business", (2003) *Columbia Journal of Transnational Law* 42 (1) 131-152.
- "Private rights vs public standards in the WTO" (2003) *Review of International Political Economy* 10(3) 377-405.
- "Copyright Licensing: The Case of Higher Education Photocopying in the UK" (2002) *European Intellectual Property Review* vol. 24(2) 438-447
- "Liberalization and Democratization: the Forum and the Hearth in the Era of Cosmopolitan, Post-Industrial Capitalism" *Law & Contemporary Problems* 63(4), 157-178 (2000).

- “Lessons of the MAI: Towards a New Regulatory Framework for International Investment” (2000) (1) *Law, Social Justice & Global Development (LGD)*.  
[http://www2.warwick.ac.uk/fac/soc/law/elj/lgd/2000\\_1/picciotto/](http://www2.warwick.ac.uk/fac/soc/law/elj/lgd/2000_1/picciotto/)
- "La Naissance de l'Offshore, les Paradis Fiscaux, et le Système Internationale", *L'Economie Politique*, 4(4), 44-69 (1999).
- (With Jason Haines) "Regulating Global Financial Markets" (1999) *Journal of Law and Society* 26(3) 351-368.
- "Linkages in International Investment Regulation: The Antinomies of the Draft Multilateral Agreement on Investment" (1998) *University of Pennsylvania Journal of International Economic Law* 19(3) 731-768
- (With David Campbell), "Exploring the Interaction between Law and Economics: the Limits of Formalism", (1998) *Legal Studies* 18(3): 249-278.
- "Towards Open Access for British Official Documents" (1996) 2 *The Journal of Information Law and Technology (JILT)*,  
[<http://www2.warwick.ac.uk/fac/soc/law/elj/jilt/1996\\_2/picciotto/#fnb8/>](http://www2.warwick.ac.uk/fac/soc/law/elj/jilt/1996_2/picciotto/#fnb8/)
- "Fragmented States and International Rules of Law", (1997) *Social and Legal Studies* 6(2): 259-279.
- "Networks in International Economic Integration: Fragmented States and the Dilemmas of Neo-Liberalism" (1997) *Northwestern University Journal of International Law and Business* 17 (2/3): 1014-1056
- "International Taxation and Intra-Firm Pricing in Transnational Corporate Groups" (1992) *Accounting, Organizations & Society* 17(8), pp.759-792.
- "Die Krise des Internationalen Staats" *Prokla: Zeitschrift für Kritische Sozialwissenschaft* No. 90: 34-49
- "The Internationalization of the State" (1991) *Capital & Class* No. 43, Special Joint Issue with *Review of Radical Political Economy*, pp.43-63.
- "The Control of Transnational Capital and the Democratisation of the International State" (1988) 15 *Journal. of Law & Society* 58-76.
- "On the Trail of Missing Millions", *South* (March 1987) 77, 16-21.
- "The Anti-Nuclear Movement and the Law in Britain", *Law and Democracy* (Japan, in Japanese) (1986) 40-43.
- "Ten Years of *Capital & Class*", (1986) *Capital & Class* No. 30, 7-15.
- (with M. Ruete) "Copyright in Court Judgments and Reports" (1985) 6 *Journal of Media Law & Practice* 75-86.
- "The Battles at Talbot-Poissy: Workers' Divisions and Capital Restructuring" (1984) *Capital & Class* 5-17.
- "Röhrenembargo, Wirtschaftsboykott und multinationale Kartelle; die Souveränitätsdoktrin im Konflikt zwischen USA und Europa" (1983) 3 *Demokratie und Recht* 262-282.

"Jurisdictional Conflicts, International Law and the International State System" (1983) 11 *International Journal of the Sociology of Law* 11-40. ( Cited by US Court of Appeals for District of Columbia, in *Laker Airways v. Sabena et al* (1984) 731 F 2nd 909, fn31.)

"The Limits and Prospects of Trade Union Internationalism" (Review Article) (1982) 10 *International Journal of the Sociology of Law* 317-339.

(with John Holloway) "Capital, the State and European Integration" (1980) 3 *Research in Political Economy* 123-154.

(Review Article) "B.Edelmann: The Legal Form and the Commodity Form" (1980) 8 *International Journal of the Sociology of Law*, 319-325.

(with John Holloway) "Capital, Crisis and the State" (1977) 2 *Capital & Class* 76-101.

(with John Holloway) "A Note on the Theory of the State: In Reply to Ian Gough" (1976) *Bulletin of the CSE* No.14.

"The International Firm, International Law and the Nation-State" (1973) 6 *Eastern Africa Law Review* 1-13.

(with H.Radice) "European Integration, Capital and the State" (1971) 1 *Bull. of the Conf. of Soc. Econ.* 32-37.

"Foreign Investment and Underdevelopment", *History of the 20th Century* (1970) No. 110

(with W.C.Whitford) "The Impact of the Tanzania Hire Purchase Act, 1966" (1969) 2 *Eastern Africa Law Review* 11-45.

"Payment by Cheque" (1967) 3 *East Africa Law Journal* 175-185.

"Extradition and Independence" (1966) 2 *East Africa Law Journal* 198-210.

"The South-West Africa Case, the New Nations, and International Law" (1966) *Journal of Modern African Studies* 375-380.

#### **CHAPTERS IN BOOKS.**

Picciotto, S. (2017) 'Corporate tax avoidance, evasion and the offshore system', in O.-H. Fjeldstad, S. K. Jacobsen, P. Henriksen and H. P. Ngowi, *Lifting the veil: International taxation and capital flight from Africa*, Chr. Michelsen Institute: 140-142.

Picciotto, S (2017) 'Transnational Corporations and the International Tax Haven and Offshore Finance System', In G. Baars, G and A. Spicer (eds) *The Corporation. A Critical, Multi-Disciplinary Handbook*. Cambridge UP pp. 303-312.

Picciotto, S. (2016) 'The Deconstruction of Offshore', In: Klug H and Merry SE (eds) *The New Legal Realism vol II. Studying Law Globally*. Cambridge UP, 160-179.

Picciotto, S. (2014), 'Humanizing Global Economic Governance', in D. Drache and LesA. Jacobs (eds.) *Linking Global Trade and Human Rights*. (Cambridge U. P.) pp. 27-45.

Picciotto, S. (2011), 'Disembedding and Regulation: the Paradox of International Finance', in C. Joerges and J. Falke (eds.), *Karl Polanyi, Globalisation and the Potential of Law in Transnational Markets* (Oxford: Hart) pp. 157-180.

- Picciotto, S. (2008) 'Regulatory Networks and Multi-Level Global Governance', in Olaf Dilling, Martin Herberg, and Gerd Winter (eds.), *Responsible Business: Self-governance and the law in transnational economic transactions* (Oxford: Hart) pp. 315-341.
- Picciotto, S., Campbell, David, (2003) 'Whose Molecule is it Anyway? Private and Social Perspectives on Intellectual Property', in Alistair Hudson (ed.) *New perspectives on property law, obligations and restitution* (Cavendish) pp. 279-303.
- Picciotto, S. (2002) 'Introduction: Reconceptualizing Regulation in the Era of Globalization', in S. Picciotto and D. Campbell (eds.) *New Directions in Regulatory Theory*. (Oxford, Blackwell), 1-11.
- Picciotto, S. (2002) 'Defending the Public Interest in TRIPS and the WTO', in Peter Drahos and Ruth Mayne (eds.) *Global Intellectual Property Rights: : Knowledge, Access and Development* (Palgrave and Oxfam).
- Picciotto, S. (2001) 'Democratizing Globalism'" in Drache, Daniel (ed.), *The Market or the Public Domain: Global Governance and the Asymmetry of Power*. (London: Routledge), 335-359.
- Picciotto, S. (2000), 'North Atlantic Cooperation and Democratizing Globalism', in G. Bermann, M. Herdegen, and P. Lindseth (eds) *Transatlantic Regulatory Cooperation* (Oxford, OUP) 495-519.
- Picciotto, S. & Campbell, David (2000), 'The Justification of Financial Futures Exchanges', in A. Hudson (ed.) *Modern Financial Techniques, Derivatives and Law*, pp.121-33, Kluwer Law International.
- Picciotto, S. (1999), 'Introduction: What Rules for the World Economy?', in Sol Picciotto and Ruth Mayne (eds.) *Regulating International Business. Beyond Liberalization*, pp. 1-28, Macmillan.
- Picciotto, S. (1999), 'A Critical Assessment of the MAI', in Sol Picciotto and Ruth Mayne (eds.), *Regulating International Business. Beyond Liberalization*, pp. 82-108, Macmillan.
- Picciotto, S. (1999), 'Offshore: The State as Legal Fiction', in Mark P. Hampton and Jason P. Abbott (eds.) *Offshore Finance Centres and Tax Havens. The Rise of Global Capital*, pp. 43-79. Macmillan Press, Basingstoke.
- Picciotto, S. (1997), 'International Law: The Legitimation of Power in World Affairs', in P. Ireland and P. Laleng (eds.), *The Critical Lawyers' Handbook 2* , pp. 13-29. London, Pluto Press.
- Picciotto, S. (1996), 'The Regulatory Criss-Cross: Interaction Between Jurisdictions and Global Regulatory Networks', in Bratton. McCahery, Picciotto & Scott (eds.) *International Regulatory Competition & Coordination* , pp. 89-123, Clarendon Press, Oxford.



- Bratton, W., McCahery, J, Picciotto, S. and Scott, C., (1996) 'Introduction: Regulatory Competition and Institutional Evolution', in Bratton, McCahery, Picciotto & Scott (eds.) *International Regulatory Competition & Coordination* pp. 1-55, Clarendon Press, Oxford.
- Picciotto, S. (1995), 'International Law in a Changing World', in G.P.Wilson (ed.) *Frontiers of Legal Scholarship*, John Wiley.
- Picciotto, S. (1995), 'The Construction of International Taxation' , ch. 1 of Y. Dezalay and D. Sugarman (eds.) *Professional Competition and Professional Power. Lawyers, Accountants and the Social Construction of Markets* Routledge, pp.25-50.
- Picciotto, S. & McCahery, J. (1995), 'Creative Lawyering and the Dynamics of Business Regulation', ch. 10 of Y. Dezalay and D. Sugarman (eds.) *Professional Competition and Professional Power. Lawyers, Accountants and the Social Construction of Markets*, Routledge, pp.238-74.
- McCahery, J., Picciotto, S. and Scott, C., 'Introduction: Corporate Control: Changing Concepts and Practices of the Firm', in J. McCahery, S. Picciotto, C. Scott (eds.) *Corporate Control and Accountability*, pp. 1-20 Clarendon Press, Oxford 1993.
- Picciotto, S. (1993), 'Transfer Pricing and the Antinomies of Corporate Regulation, in J. McCahery, S. Picciotto, C. Scott (eds.) *Corporate Control and Accountability*, pp. 375-405, Clarendon Press, Oxford.
- Picciotto, S. (1993), 'Compétition et innovation en matière de fiscalité transnationale', ch. 1 of Y. Dezalay (ed.) *Batailles territoriales et querelles de cousinage. Juristes et comptables européens sur le marché du droit des affaires.* LGDJ, Paris, pp.29-44.
- Picciotto, S. (1993), 'International Business and Global Development', in S. Adelman and A. Paliwala (eds.) *Law & Crisis in the Third World*, Hans Zell, London.
- Picciotto, S. (1991), 'The Internationalization of Capital and the International State System', in S. Clarke, *The State Debate*, Macmillan, pp. 214-224.
- Picciotto, S. (1989), 'Slicing a Shadow: Business Taxation in an International Framework', in Hancher & Moran (eds.) *Capitalism, Culture and Legal Regulation* , Clarendon Press, Oxford, pp.11-47.
- Picciotto, S. (1986), 'Law, Life and Politics', in Shivji (ed.) *Limits of Legal Radicalism*, Dar es Salaam, pp.36-47.
- Picciotto, S. (1986), 'Nuclear Weapons, State Power and Legitimacy in International Law', in Dewar, Paliwala, Picciotto & Ruete (eds.) *Nuclear Weapons, the Peace Movement and the Law*, Macmillan, pp.3-24.
- Picciotto, S. (1984), 'Political Economy and International Law', in S.Strange (ed.) *Paths to Political Economy*, Allen & Unwin, pp.164-182.
- Picciotto, S. (1984), 'Jurisdictional Conflicts, International Law and the International State System' in D. Massey (ed.) *Geography Matters*, Cambridge University Press, for the Open University, pp.85-105.

Picciotto, S. (1979), 'The theory of the state, class struggle and the rule of law', in Fine, Kinsey, Picciotto & Young (eds) *Capitalism and the Rule of Law* Hutchinson, pp.164-177. (Reprinted in Beirne & Quinney, *Marxism & Law* John Wiley, New York, 1982.)

Holloway, J. and Picciotto, S. (1978), 'Towards a Materialist Theory of the State' in Holloway & Picciotto (eds) *State and Capital, A Marxist Debate* Edward Arnold, 1-31.

Picciotto, S. (1978), 'Firm and State in the World Economy', in Faundez & Picciotto (eds.), *The Nationalization of Multinationals in Peripheral Economies*, Macmillan, pp.215-234.

Holloway, J. and Picciotto, S. (1977), 'Capital, the State and European Integration, *Colloque Sur L'Etat*, ACSES, Paris.

Picciotto, S. (1973), 'The International Firm, International Law and the Nation-State, Zorn & Bayne (eds) *Foreign Investment, International Law and National Development*, Butterworths.

## **REPORTS**

Picciotto, S., et al. (2017). *The G20 and the "Base Erosion and Profit Shifting (BEPS) Project"*. Bonn, German Development Institute / Deutsches Institut für Entwicklungspolitik (DIE).

## **RESEARCH MEETINGS AND CONFERENCES ORGANISED**

Director, conference on *The Social Economy: Corporate Responsibility, Private Property & Partnerships, Workers' Rights and Cooperatives*, Oñati (Gipuzkoa), Spain, July 2011.

Joint Organiser, Seminar on the Multilateral Agreement on Investment, London, sponsored by Oxfam and WWF, March 1998.

Joint Organiser, Colloquium on International Regulatory Competition and Coordination, University of Warwick, July 1994.

Joint Organiser, Workshop on Corporate Control and Accountability, University of Warwick, July 1991.

Joint organiser, Conference on Anglo-Argentine Relations since the South Atlantic Conflict, funded by the Ford Foundation and the University of Warwick, Buenos Aires, April 1988.

Organiser, Symposium on Anglo-Japanese Law, funded by The Japan Foundation, Warwick University, December 1986.

Organising Committee member, joint conference of National Deviancy Conference and CSE Law & State group, London, January 1979.

Conference Organiser, Annual Conference of the Conference of Socialist Economists, Coventry, July 1976.

Secretary, East & Central African Conference on World Peace through Law, funded by the World Peace through World Law Foundation, Dar es Salaam, May 1966.

#### SELECTED CONFERENCE PAPERS

‘Corporations in International Law: Between a Hard and a Soft Place’, paper delivered to the annual conference of the British Branch of the International Law Association, London, 16-17 May 2008, *Does International Law Mean Business - A Partnership for Progress?*.

‘Constitutionalizing Multi-Level Governance’, paper delivered to the Conference on *Rethinking Constitutionalism in an Era of Globalization and Privatization*, Cardozo School of Law and New York University School of Law, New York, 4<sup>th</sup>-5<sup>th</sup> November 2007.

‘The International Crisis of Income Taxation’, paper delivered to the 15<sup>th</sup> Commonwealth Law Association Conference, Nairobi, Kenya, 9<sup>th</sup>-13<sup>th</sup> September 2007.

‘Expertise, National Interest and Universal Values in the Transnational Transformation of the State’, paper given at the Law & Society Conference, Berlin, 25<sup>th</sup>-29<sup>th</sup> July 2007.

‘Tackling Tax Havens and Offshore Finance’, paper for the Seminar on Money Laundering, Tax Evasion and Financial Regulation Transnational Institute Amsterdam 12<sup>th</sup>-13<sup>th</sup> June 2007.

‘Law and Legitimacy in Multi-Level Governance’, paper for the Workshop on Multi-Level Governance, Centre for Globalization and Regionalization, University of Warwick, 17<sup>th</sup>-19<sup>th</sup> May 2007.

‘Devising Fair Rules for Multi-Level Games: Limitations of the OECD’s Harmful Tax Practices Initiative’, presentation to the Tax Justice Research Workshop, Nairobi, Kenya, 18<sup>th</sup>-19<sup>th</sup> January 2007.

“WTO: From Trade Organization to Node of Global Governance”, Paper for the Conference on WTO at the Crossroads: the Challenges Ahead organised by the Asian WTO Research Network, Bangkok, 25-27 November 2006.

“Information Exchange: the Developmental Implications”, presentation to Tax Justice Seminar for Developing Countries organised by the South Centre and the Tax Justice Network, Palais des Nations, Geneva, 30 October 2006.

“Networks of Regulation” invited presentation to a Policy Forum organised by the Society for Computers and the Law, London 26<sup>th</sup>-27<sup>th</sup> October 2006.

“Coordination and Legitimacy in International Business Taxation”, invited paper to International Research Collaborative on Transnational Transformations of the State, Law & Society Association Annual Meeting, Baltimore (Md) USA 6-9<sup>th</sup> July 2006.

“Regulatory Networks and Global Governance”, invited plenary paper to the Hart Legal Workshop, Institute of Advanced Legal Studies, London University, 29<sup>th</sup> June 2006.

“The WTO as a Node of Global Governance: Economic Regulation and Human Rights Discourses”, Paper for the Conference on Human Rights and Global Justice University of Warwick, 29-31 March 2006.

- “Fairness and the Public Interest in International Taxation”, opening presentation to a Workshop on The Public Interest in International Taxation, Exeter University, February 2006.
- “Public-private Interactions in International Regulation for Corporate Social Responsibility”, Inaugural Workshop of the Amsterdam Centre for Corporate Governance Regulation, 17-18 December 2004.
- “Compatibility of Public Interest Regulation or Open Access Models of IPRs with the TRIPS Agreement”, Lund Workshop of the Property Regulation in European Science, Ethics and Law (PropEur) Project, Sweden, 26-27 November 2004.
- “Legalisation, Formalism and Global Governance”, Conference on Economic Reform, Rule of Law, Social Justice, Boğaziçi University, Istanbul, 5-6 November 2004
- “Tax Jurisdiction and Global Apportionment”, presentation to workshop on *Tax Competition and Tax Avoidance: Implications for Global Development*, Essex University, July 2004.
- “International Investment Agreements and their Interaction with Related Agreements”, paper delivered to the Investment Experts Group, Asia-Pacific Economic Cooperation (APEC), seminar in Phuket, Thailand, August 2003.
- "Investor Obligations and Home Country Measures", UNCTAD & Government of India *International Conference on Trade, Investment and Development* 18-20 May 2003, New Delhi
- "Eu Company Taxation: Competition, Coordination, Harmonisation, Integration", ARENA Seminar, Oslo University, 13 May 2003.
- "Private Rights vs Public Interests in the TRIPs Agreement", Panel on *Is the International Trade Régime Fair to Developing States?*, American Society of International Law Annual Meeting, Washington DC, April 2003.
- "Rights, Responsibilities and Regulation of International Business", First Appel Conference, Columbia University, New York, March 2003.
- (with David Campbell) “The Antinomies of Intellectual Property: Rationing, Regulation, Remedies and Revenues”, W. G. Hart Workshop The Idea of Property and Obligations in Law, Institute of Advanced Legal Studies, London, July 2002
- "Private Rights vs Public Standards in the WTO: For a Margin of Appreciation in the Interpretation of the WTO Agreements", Beyond the Washington Consensus: Revisiting the Fundamentals. Chandigarh, India, 11th-14th February 2001.
- "What's New About Global Governance", invited paper to ERC/METU International Conference in Economics IV, Ankara, Turkey, 13-16 September 2000.
- "The Global Anti-Globalism Movement", Law & Society Association Annual Meeting, 26-29<sup>th</sup> May 2000, Miami Beach, Florida.
- "Transnational Civil Society and Models of International Governance", Roundtable on Transnational Lawmaking, Fordham University Law School, New York City, 26<sup>th</sup> April 2000.

- "Linking Rights with Responsibilities: Corporate Codes and International Law", Conference on Corporate Governance and Corporate Responsibilities, York University, Toronto, April 17-18<sup>th</sup> 2000.
- "The End of Offshore? Regaining Public Control of Finance and Taxation in the Era of Globalization", conference on Governing the Public Domain Beyond the Era of the Washington Consensus? Redrawing the Line between the State and the Market. York University, Toronto, 4-5<sup>th</sup> November, 1999.
- "Balancing Corporate Rights with Responsibilities", Conference on the Role of International Investment in Development, Corporate Responsibilities and the OECD Guidelines for Multinational Enterprises, Organisation for Economic Cooperation and Development, Paris, 20-21<sup>st</sup> September, 1999.
- "Corporate Social Responsibility", Inter-regional Symposium on International Investment Agreements and their Implications for Development, organised by the United Nations Conference on Trade and Development, Xiamen, China, 9-10<sup>th</sup> September, 1999.
- "Liberalization and Democratization", Public Perspectives on Privatization: An International Conference, Geneva, Switzerland, 16-18<sup>th</sup> July 1999.
- "Democratizing Globalism", conference on Transatlantic Regulatory Cooperation, European Legal Studies Centre, Columbia Law School, New York, April 1999.
- "Lessons of the MAI: Towards a New Regulatory Framework for International Investment", Panel on International Investment, American Society of International Law, Washington D.C., March 1999.
- "Regulating Global Financial Markets" (with Jason Haines), W.G. Hart Legal Workshop 1998, Transnational (Corporate) Finance and the Challenge to the Law, London 7-9 July 1998.
- "The Origins and Justification of Financial Futures Exchanges" (with David I. Campbell), W.G. Hart Legal Workshop 1998, Transnational (Corporate) Finance and the Challenge to the Law, London 7-9 July 1998.
- "Globalisation, Liberalisation, Regulation", Conference on Globalisation, The Nation-State, and Violence organised by the Review of International Political Economy, Sussex University, 16th April 1998.
- "Linkages in International Investment Regulation and the Multilateral Agreement on Investment", Conference on Linkage as a Phenomenon: An Interdisciplinary Approach, organised by the International Economic Law Group of the American Society of International Law, Washington D.C., December 1997.
- "Global Regulation, Financial Risk, and Futures Markets", Colloquium of the CONGLASS (Consortium of Globalisation of Law and Social Sciences), New York University, April 1997.
- "Networks in International Economic Integration", Conference on Institutions in International Economic Integration organised by the International Economic Law Interest Group of the American Society of International Law, Washington DC, 17-19 May 1996.

- “Fragmented States and International Rules of Law”, Inaugural Lecture, delivered at Lancaster University, 31st January 1996.
- “Competition and Coordination in International Business Regulation: Regional and International Networking and Institutionalization”, Law & Society Association, Toronto, 1st June 1995.
- "International Regulatory Networks: The Globalisation of Business Regulation", delivered by invitation at the University of Wisconsin School of Law, and the American Bar Foundation, April 1995.
- "International Regulatory Networks: The Globalisation of Business Regulation", delivered by invitation at the University of Wisconsin School of Law, and the American Bar Foundation, April 1995.
- "International Regulatory Networks: The Globalisation of Business Regulation", Colloquium on Regulatory Competition and Coordination, The University of Warwick, July 1994.
- "Globalisation and Business Regulation", delivered at University of New South Wales, Canberra University, Macquarie University, University of Hong Kong, April 1994.
- "International Taxation and the Transfer Pricing Problem", The Law Society of Hong Kong, April 1994.
- "Competition and Innovation in International Tax Planning", discussion paper 2/93, The Management School, Lancaster University.
- "Regulating Intrafirm Transfer Pricing by TNCs", Workshop on Corporate Control and Accountability, Warwick University, July 1991.
- "The Construction of International Taxation", European Group on Corporate Professionals, CRIV Vaucresson, Paris, June 1991. Also presented at the International Conference of Law in Society Scholars, Amsterdam, June 1991.
- "Penumbra Lawyering and Regulatory Avoidance", (with Joe McCahery), European Group on Corporate Professionals, CRIV Vaucresson, Paris, June 1991.
- "International Action against Insider Dealing", Warwick-Giessen Colloquium, University of Warwick, September 1989.
- "The Internationalization of the State", Conference on Global Imbalances, The American University, Washington D.C., May 1989.
- "International Tax Avoidance", Socio-Legal Studies Conference, University of Edinburgh, April 1989.
- "Internationalisation of Capital and the State: International Business Taxation", Conference of Socialist Economists, Sheffield, July 1988.
- "International Administrative Assistance and Multinational Business Taxation", Warwick-Giessen Colloquium, Giessen, Nov.1987
- "Legal and Administrative Problems of Taxation of Multinational Companies", W.G.Hart Workshop, Institute of Advanced Legal Studies, London, July 1987
- "Political Economy and International Law", Kyoto Society of International Law, May 1986; also at Faculty of Law, University of Tokyo, June 1986.

- "Nuclear Weapons, State Power and Legitimacy in International Law", Peace Research Institute, Hiroshima University, May 1986.
- "Nuclear Weapons, the Peace Movement and the Law in the UK", Nagoya branch of the Law Section, Japan Association of Democratic Lawyers, May 1986.
- "The Internationalisation of Capital and the International State", Conference of Socialist Economists, Manchester, July 1985.
- "The Sizewell B PWR and Namibian Uranium: International Legal Aspects", Expert Evidence given to the Public Inquiry into the Sizewell B Power Station, RR/P/3, May 1984
- "Nuclear Weapons, State Power and Legitimacy in International Law", Conference on the Legality of Nuclear Weapons, Coventry, May 1984.
- "Jurisdictional Conflicts, International Law and the International State System", European Conference on Critical Legal Studies, Denmark, Sept. 1983.
- "The Copyright Controversy: An Academic Viewpoint", Annual Conference of the College and University Booksellers' Association, Harrogate, March 1983.
- "Repression and Legality", British Sociological Association group on Law and State, Glasgow, June 1980.
- "Die Britische Staatsdebatte", Conference on Theories of the State, Bremen University, February 1980.
- "The New Right and the Rule of Law", National Deviancy Conference, London, Sept. 1980.
- "The Right to Schooling", Socialist Teachers Alliance Conference, July 1978.
- "Neo-Marxist Theories of State and Law", Conference on Law and the State of US National Lawyers' Guild, Rutgers University, Sept. 1979.
- "Capital, the State and European Integration", Annual Conference of Association Critique des Sciences Economiques et Sociales, Nice, Sept. 1976.
- "Britain and the EEC", Conference of Socialist Economists, Workshop on the EEC, London, May 1975.
- "The International Firm, International Law and the Nation-State", 7th Waigani Seminar, University of Papua New Guinea, April 1973.
- "Negotiations Following Nationalisation", Study Seminar on the State Corporation, Institute of Development Studies, University of Sussex, May 1970.