

TAXTEC

Withholding Tax Reclaim Providers Compared

Why institutional investors are rethinking the traditional operating model

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Withholding tax recovery is becoming a more strategic operational consideration for institutional investors. Jurisdictional expertise, reclaim experience, service quality and cost remain important, but they are no longer the only factors to consider.

Regulatory change, pressure to scale operations, stronger expectations around governance and transparency, and more mature technology are changing what institutions need from their reclaim arrangements. The key decision is increasingly not simply which provider to appoint, but which operating model best fits the organisation's objectives, controls and resources.

There is no single model that suits every institution. Internal teams, custodians, specialist providers, advisory firms and digital platforms each offer different strengths. A well-informed assessment considers how expertise, technology, oversight and delivery flexibility work together.

1. Why The Operating Model Matters

Traditional provider comparisons tend to focus on familiar criteria: jurisdictional coverage, technical expertise, documentation requirements, processing capacity, pricing, service quality and turnaround times. These remain essential, but they do not always reveal whether an arrangement will remain suitable as an institution evolves.

Institutions also need to consider how the service supports regulatory change, operational resilience, reporting, auditability, data quality and integration with wider operations. Can the model scale with transaction volumes? Does it provide sufficient visibility of claims and exceptions? Can workflows adapt to different client or portfolio requirements?

These questions shift the discussion from a list of provider features to the design of the service itself. A strong operating model should enable accurate and timely recovery while supporting appropriate oversight, efficient exception handling and the institution's longer-term plans.

2. What Is Changing In The Market?

Regulatory Transformation

Tax authorities are continuing to digitise administration and documentation. Initiatives such as the EU's FASTER framework and Germany's MiKaDiv illustrate the direction of travel towards more digital processes, structured information, transparency and intermediary accountability. Institutions need arrangements that can respond to changing requirements without relying solely on occasional, resource-intensive redesign.

Operational Efficiency and Resilience

Operations teams are expected to manage complex cross-border activity while controlling cost and headcount. Efficiency is therefore about more than processing speed: it also includes consistent controls, fewer avoidable manual steps, effective exception management and the ability to maintain service when circumstances change.

Governance and Fiduciary Stewardship

Recovering tax that is legitimately due can contribute to post-tax investment performance. Boards, trustees and investment committees may therefore expect clear evidence of oversight, including how recovery opportunities are identified, monitored and pursued. Reporting, traceability and well-defined responsibilities help institutions demonstrate that the process is appropriately managed.

Client Expectations and Technology

Clients increasingly expect timely information, responsive service and useful operational insight. Meanwhile, cloud infrastructure, workflow tools, APIs and improved data management can support different ways of delivering the service. Technology is most valuable when it strengthens the operating model not simply when it adds features.

3. Five Operating Models For Withholding Tax Recovery

The market includes several broad approaches. In practice, organisations may combine elements of more than one model, and capability varies between individual providers. The following descriptions are intended as a framework for evaluation, rather than a ranking.

1. Internal Tax Recovery

An institution's own team manages entitlement analysis, documentation, claim preparation and liaison with custodians or tax authorities. This can provide direct control and preserve specialist knowledge internally, which may be valuable where investment structures or governance requirements are particularly complex.

The trade-off is the continuing investment required to maintain jurisdictional expertise, monitor rule changes, manage documentation and support operational technology. Institutions should consider whether internal processing remains the best use of specialist resources and whether the model can scale sustainably.

2. Custodian-led Reclamation

Tax recovery is delivered through an existing custody relationship, often alongside safekeeping, settlement, corporate actions and other asset-servicing activities. For many institutions, this integration can be convenient and effective.

The evaluation should look beyond coverage to the service actually delivered: the level of automation, visibility of claim status, handling of exceptions, implementation of regulatory changes and ability to accommodate different client requirements. Custodians differ, so these capabilities should be assessed on evidence rather than assumption.

3. Specialist Reclaim Providers

Dedicated withholding tax recovery firms focus on reclaim expertise, jurisdictional requirements, documentation and claim processing. They may offer depth of experience and operational capacity that would be difficult for some institutions to maintain in-house.

Institutions should examine how the specialist service is supported by data, technology, reporting and governance. The key question is whether the provider's processes and tools meet current needs and can adapt as requirements change.



4. Advisory-led Support

Professional services and tax advisory firms can be particularly valuable for complex technical questions, tax interpretation, structuring and situations requiring specialist advice.

An advisory engagement may not, by itself, provide the ongoing operational infrastructure needed to manage high volumes of claims. Institutions should clarify whether they need advice, recurring processing, technology, or a combination of these capabilities.

5. Digital Tax Operating Platforms

Digital platforms use software, data management and workflow capabilities to support reclaim activity. Depending on the provider and arrangement, a platform may be used by an institution's own team, as part of a managed service, or in a hybrid model.

Potential benefits include more consistent workflows, improved visibility, structured document management, reporting and integration options. These benefits depend on the platform's actual capabilities, implementation and controls; technology does not remove the need for specialist tax knowledge or sound operational governance.

4. How To Evaluate The Options

Rather than treating any one model as inherently superior, institutions can assess each option against a common set of requirements.

Regulatory Confidence and Expertise

Consider jurisdictional experience, how changes are monitored and implemented, how documentation requirements are managed, and how exceptions or complex cases are escalated.

Governance, Transparency and Control

Establish who owns each stage of the process, what oversight the institution retains, how decisions are recorded and what reporting is available. The model should support a clear audit trail and appropriate accountability.

Operational Performance and Scalability

Assess capacity, consistency, turnaround times, exception handling and the ability to manage changing volumes. Understand where manual intervention remains necessary and how operational resilience is maintained.

Technology, Data and Integration

Review workflow configuration, data quality controls, document lifecycle management, reporting, access controls and available integration methods. Ask for evidence of how technology supports the process in practice.

Service Flexibility and Future Fit

Different institutions have different priorities. A global custodian may focus on scale and integration; an asset manager may place greater weight on transparency; a pension scheme may emphasise governance and resilience; and a wealth manager may prioritise simplicity and client reporting. The chosen model should fit these requirements and allow for change overtime.



Traditional and Digitally Enabled Models: A Practical Comparison

The table below highlights common differences in emphasis. It is not a universal description of every provider: established service providers may offer advanced technology, and digital platforms vary in their functionality and delivery options.

Area	Service-led Approach	Digitally Enabled Approach
Primary Emphasis	Processing and submitting claims	Supporting the end-to-end operating process
Workflow	May rely on established, predefined processes	May offer configurable workflows and routing
Visibility	Reporting based on the service arrangement	Potential for more frequent, detailed operational insight
Data and Documents	Capabilities vary by provider	May support structured data and digital document management
Integration	May use existing or bespoke interfaces	May offer APIs or other integration options
Delivery Model	Often linked to a defined service	May support SaaS, managed or hybrid arrangements
Change and Scale	Depends on provider processes and resources	Technology may support more scalable adaptation

Questions to ask prospective providers

- How are regulatory and documentation changes identified, assessed and implemented?
- What visibility will we have over claims, exceptions, deadlines and outcomes?
- How are data quality, access, security and audit trails managed?
- Which activities remain with us, and which are the provider’s responsibility?
- How does the service scale when volumes, jurisdictions or client requirements change?
- Can the model integrate with our existing systems and reporting processes?
- Can we change the balance between internal ownership, external support and software over time?

5. Flexibility As A Strategic Consideration

Institutions do not all want to outsource the same activities. Some prefer a fully managed service; others want to retain process ownership and use software to support their teams; many sit between these approaches. Some may also want to embed reclaim activity within wider post-trade or asset-servicing operations.

A flexible model can allow an institution to choose the balance that suits its operating maturity, risk appetite and resources. It may also make it easier to evolve the arrangement gradually, rather than undertake a wholesale change whenever requirements shift. The important point is not that one delivery model is always better, but that the model should be appropriate and sustainable.



The TaxTec perspective

TaxTec's approach is built around supporting different client operating models through a common digital foundation. Depending on the client's needs, this can include a managed service, software that enables internal teams to retain process ownership, or a hybrid arrangement combining internal control with external technology and operational support.

The underlying principle is that technology should support the institution's chosen way of working. It should help make activity more visible and manageable without requiring every organisation to adopt the same delivery structure.

Frequently Asked Questions

What are the main types of withholding tax reclaim providers?

The main approaches are internal tax teams, custodian-led services, specialist reclaim providers, advisory firms and digital tax operating platforms. Each has different strengths, and some arrangements combine several approaches.

Should an institution use its custodian, a specialist provider or a digital platform?

There is no universal answer. The right choice depends on the institution's jurisdictional needs, internal capabilities, governance requirements, desired level of control, technology environment and long-term plans. Compare the actual service and operating model rather than relying on provider category alone.

Why has technology become more important?

Technology can support consistent workflows, data management, reporting, integration and operational visibility. Its value depends on how well it is implemented and combined with specialist expertise, effective controls and clear responsibilities.

How can the operating model support fiduciary responsibilities?

Clear ownership, reliable records, reporting and audit trails can help institutions oversee reclaim activity and evidence how opportunities and claims are managed. These capabilities should be assessed as part of the wider governance framework.

Can an institution change its operating model over time?

Potentially, yes. Depending on the provider and arrangement, an institution may move between internal, managed and hybrid approaches. It is worth assessing from the outset how easily responsibilities, workflows and technology can adapt as needs change.

Conclusion

Withholding tax recovery remains a specialist activity, but choosing a provider increasingly means evaluating the operating model behind the service. Expertise, coverage, cost and processing capacity remain fundamental. Institutions should also consider regulatory adaptability, governance, transparency, resilience, technology and delivery flexibility.

The most suitable model is the one that fits the institution's requirements today and can continue to support them as those requirements evolve. The key question is therefore not only, "Which provider should we appoint?" but also, "Which operating model will best support our organisation, our clients and our future?"

