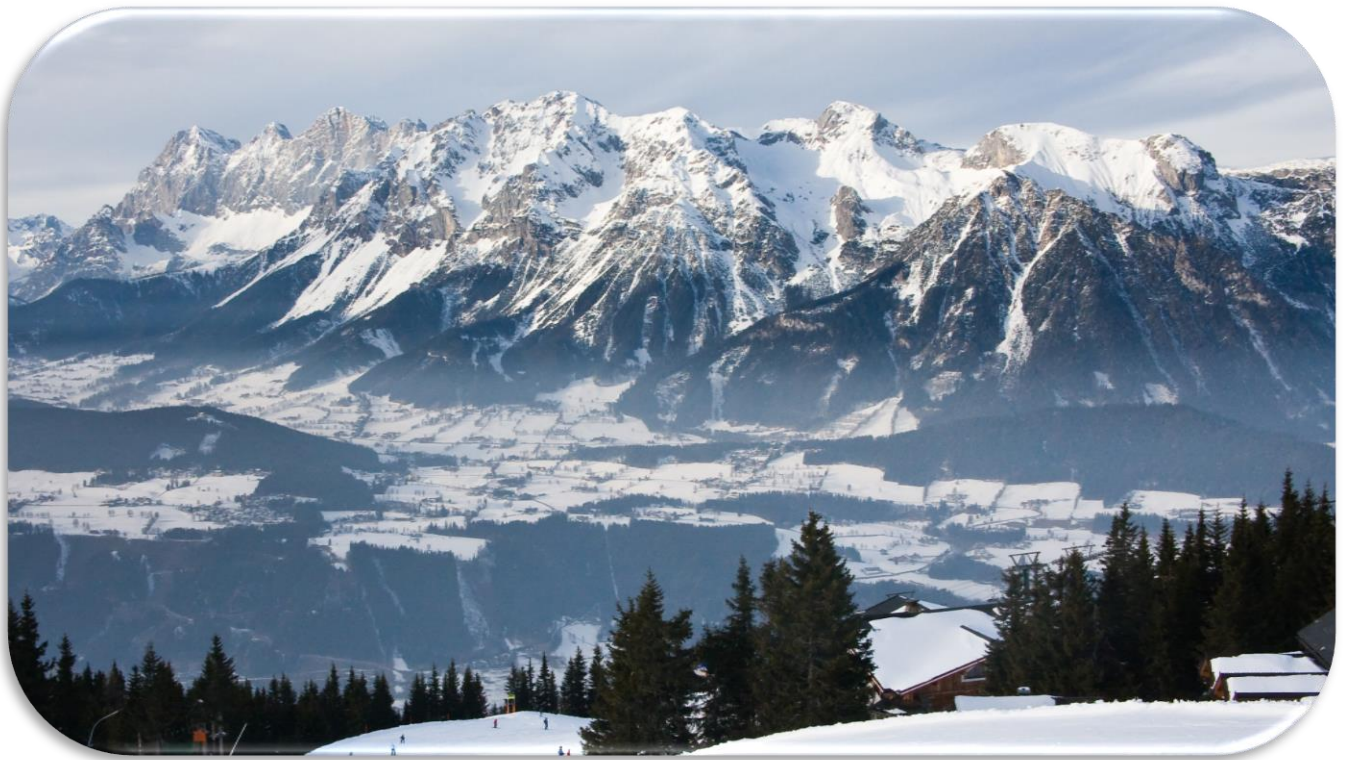
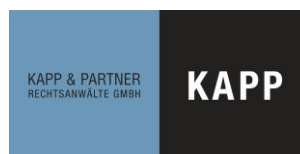


**GGI ITPG GLOBAL TAX SUMMIT
2-5 MARCH 2017
SCHLADMING, AUSTRIA**



Hosted by:



Hotel Pichlmayrgut
Pichl 54, 8973 Schladming, Austria
T: +43 6454 7305
W: www.pichlmayrgut.at

Dress Code: Casual

We kindly thank our sponsors:

BANK ALPINUM 

CORNER 
Cornier Bank AG


COMTAX

www.ggi.com
www.ggiform.com

PROGRAMME

Thursday, 2 March 2017

Individual arrival at Hotel Pichlmayrgut

19:00 – 23:00 Welcome Reception & “Alpentapas”, followed by Dinner
Room Hotelhalle

Friday, 3 March 2017

07:00 – 08:30 Breakfast available in the Hotel

09:00 – 10:00 Morning Session I
Room Dachstein

Words of Welcome from GGI Marco Izzo

Words of Welcome from the Hosts Mario Kapp & Raffaella Lödl

Presentation of First-Time Attendees and of Internal ITPG Topics Oliver Biernat

“Success Out of Insolvency” Mario Kapp

“Withholding Tax in Source Country vs Subsequent Tax Credit in Winfried Ruh &
Home Country – a case study between India and Germany with Ashish Bairagra
inputs from some other countries”

10:00 – 11:00 COMTAX Software – 6 Hours Billable International Tax Work Christoffer Asmundsson
Done in 10 Minutes!

11:00 – 11:30 Coffee Break

11:30 – 13:15 Morning Session II
Room Dachstein

“Implementation of a Transfer Price System in a Group, where the Bernhard Schwechel
Mother Company is located in Germany with Subsidiaries in
China and India”

Panel Discussion: “Compliance Requirements in Source Graeme Saggars, Susann Roll,
Country – are Your Clients (really) Compliant?” Sergio Finulli, Vijesh Zinzuwadia
& Tobias Wilhelm

13:15 – 14:15 Lunch
Hotel Restaurant

14:15 – 16:00	<p>Afternoon Session I <i>Room Dachstein</i></p> <p>Case Study: “Transfer Pricing Documentation Requirements for Elisa Martinelli Multinational Groups”</p> <p>Panel Discussion: “Are Tax Laws BEPS-Compliant Already?” Ashish Bairagra, Robert Worthington, Alan Rajah, Carlos Frühbeck Olmedo & Oliver Biernat</p> <p><i>All participants are requested to read about recent BEPS Action Plan measures introduced in their respective countries to make the panel discussion more interactive.</i></p>
16:00 – 16:30	Coffee Break
16:30 – 17:30	<p>Afternoon Session II <i>Room Dachstein</i></p> <p>“Last Chance Saloon for Non-Doms before Changes to the Nick Brennan UK Taxation of Non-Domiciliaries Takes Effect from 6 April 2017”</p> <p>“Third Company Tax Reform in Switzerland: Termination of Tax Marc Nideröst Privileges for Holding- and Admin Companies, Financial Permanent Establishments as well as Principal Companies; Termination of Privileges of the Cantons; Introduction of a Patent Box etc”</p> <p>Feedback from the Survey on CFC Artur Plutowski</p>
17:45 – 18:30	<p>Yoga Session for Beginners Ashish Bairagra</p> <p><i>All the yoga ‘asanas’ (exercises) will be conducted while sitting on a chair or standing. Specific (yoga) clothing is not required for this session. The objective of the beginners session is to help you repeat these ‘asanas’ (exercises) at home or in the office, anytime during the day, without any assistance.</i></p>
19:30 – 23:30	<p>Dinner at the Schafalm (Ski lodge event: “Hüttengaudi”) <i>Meeting Point: Hotel Lobby, 20 min bus ride</i></p> <p><i>Bus returns to the Hotel at 23:30 pm; those who would like to return earlier or later may use a taxi. (The taxi cost is not included in the Registration Fee.)</i></p>

Saturday, 4 March 2017

- 07:00 – 08:30 Breakfast available in the Hotel
- 09:00 – 11:00 Morning Session I
Room Dachstein
- Tax Marketing and Sales or “How to Sell Consulting Services Dennis L. Nerland for USD 1,500 per hour”
- Dennis will share his experience with us on how to market and sell tax services successfully. After his presentation certain aspects of his recommendations and how to implement them in your own firms will be discussed in small groups and the results will be presented in front of all attendees.*
- 11:00 – 11:30 Coffee Break
- 11:30 – 13:00 Morning Session II
Room Dachstein
- “Unintended Foundation of a Permanent Establishment through Olga Ottstadt Distribution and Other Activities”
- “The Next Generation of CEOs and How to Market to Them: Maddalena Biasiol Millennialise Your Message”
- 13:00 – 13:45 Lunch (Soup & Salad)
- 14:00 – 18:30 OPTIONAL: Guided tour to the “Dachstein Glacier”
Meeting Point: Hotel Lobby, 45 min bus ride
- 19:30 – 23:30 Dinner in the Hotel, including wine-tasting and dancing
Hotel Restaurant

Sunday, 5 March 2017

- 07:00 – 09:00 Breakfast available in the Hotel
- Individual check out no later than 11:00 am

MEETING LOCATION

Schladming

Schladming is a small town in the northwest of the Austrian state of Styria and one of the top ski areas in Austria. It has become a popular tourist destination and has held various skiing competitions, i.e. the FIS Alpine World Ski Championships 1982 and 2013. The Planai, Hochwurzen, Hauser Kaibling and Reiteralms are the four ski mountains of the Schladming ski area. The "Schladminger 4-Berge- Skischaukel" ("Schladminger 4-mountain-ski cable car") connects the four mountains: one big ski area with only one ski-ticket.

The Dachstein is the second highest mountain in the Northern Limestone Alps (2,995 m high). The Dachstein Glacier is only 20 km away from Schladming and is a "hot spot" for tourists. The view is stunning.

The shopping area of Schladming offers many cafes, restaurants and a variety of shops. So there are also a lot of possibilities for accompanying persons and for delegates who want to extend their stay, and explore Schladming and the surrounding area. The average temperature in March is between a lowest of -5° C and a highest of 14° C. Schladming and the surrounding mountains are the right place to strengthen body and soul.

Hotel Pichlmayrgut

The Meeting will take place in Hotel Pichlmayrgut Wellness Resort (<http://www.pichlmayrgut.at/>) in Pichl near Schladming (10 minutes by car). It is a **4-star** holiday village resort with traditional Austrian charm & hospitality. The hotel offers a spa, indoor and heated outdoor pool, meeting rooms, a cafe, bar, restaurants and free WIFI in all rooms. The Reiteralms ski area is very close to the hotel Pichlmayrgut. You can take the free ski bus from the Hotel Pichlmayrgut to the valley station of the Reiteralms. Sports equipment, ski-fashion, ski rental and ski service is available at the valley station of the Reiteralms.

The journey from Salzburg Airport to the Hotel Pichlmayrgut Wellness Resort takes about an hour. The transfer from the airport to the Hotel Pichlmayrgut is no problem. The Hotel offers a hotel shuttle service. This cost is not included in accommodation costs.

Munich Airport is also located fairly nearby (about 2 hours).