

Agenda ITPG Global Tax Summit 2017



Friday 3rd. March 2017

9:00 - 9:05 Words of Welcome from **GGI**: Marco Izzo

9:05 - 9:10 Words of Welcome from the **Hosts**: Mario Kapp & Raffaella Lödl

9:10 - 9.30 Presentation of First-Time Attendees and of **Internal ITPG Topics**:
Oliver Biernat

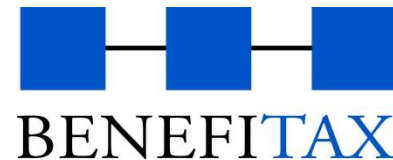
9:30 - 9:45 “Success Out of **Insolvency**”: Mario Kapp

9:45-10:00 “**Withholding Tax** in Source Country vs Subsequent Tax Credit in Home Country – a case study between India and Germany with inputs from some other countries: Winfried Ruh & Ashish Bairagra

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

11:00 - 11:30 **Coffee** Break

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11:30 – 11:45 **“Implementation of a Transfer Price System in a Group, where the Mother Company is located in Germany with Subsidiaries in China and India”:**

Bernhard Schwechel

11:45 – 13:15 **Panel Discussion: “Compliance Requirements in Source Country – are Your Clients (really) Compliant?”:** Graeme Saggars & Panellists: Susann Roll (Germany), Dr. Sergio Finulli (Italy), Vijesh Zinzuwadia (India), Tobias Wilhelm (Switzerland)

13:15 – 14:15 **Lunch**

14:15 – 14:30 **Case Study: “Transfer Pricing Documentation Requirements for Multinational Groups”:** Elisa Martinelli

14:30 – 16:00 **Panel Discussion: “Are Tax Laws BEPS-Compliant already?”** Ashish Bairagra & Panellists: Robert Worthington (Canada), Alan Rajah (UK), Carlos Fruhbeck (Spain), Oliver Biernat (Germany)

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Friday 3rd. March 2016

16:00 – 16:30 **Coffee** Break

16:30 – 16:50 “Last Chance Saloon for Non-Doms before Changes to the **UK Taxation of Non-Domiciliaries** Takes Effect from 6 April 2017”: Nick Brennan

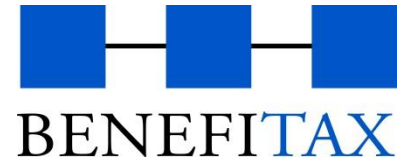
16:50 – 17:10 “Third Company **Tax Reform in Switzerland**: Marc Nideröst

17:10 – 17:30 Feedback from the **Survey on CFC**: Artur Plutowski

17:30 – 17:45 **Break**

17:45 – 18:30 **Yoga** Session for Beginners: Ashish Bairagra

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Saturday 4th. March 2016

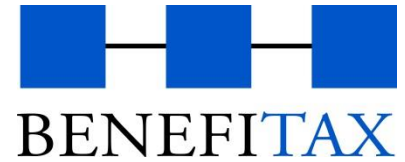
09:00 – 11:00 **Tax Marketing and Sales** or “How to Sell Consulting Services for USD 1,500 per hour”: Dennis L. Nerland

11:00 – 11:30 **Coffee** Break

11:30 – 11:45 “Unintended Foundation of a **Permanent Establishment** through Distribution and Other Activities”: Olga Ottstadt

11:45 – 13:00 “The Next Generation of CEOs and How to Market to Them: **Millennialise Your Message**”. Maddalena Biasiol

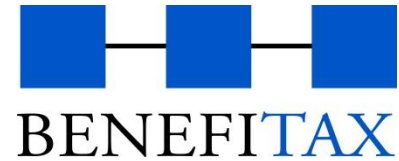
13:00 – 13:45 **Lunch** (Soup & Salad)



Internal ITPG Topics

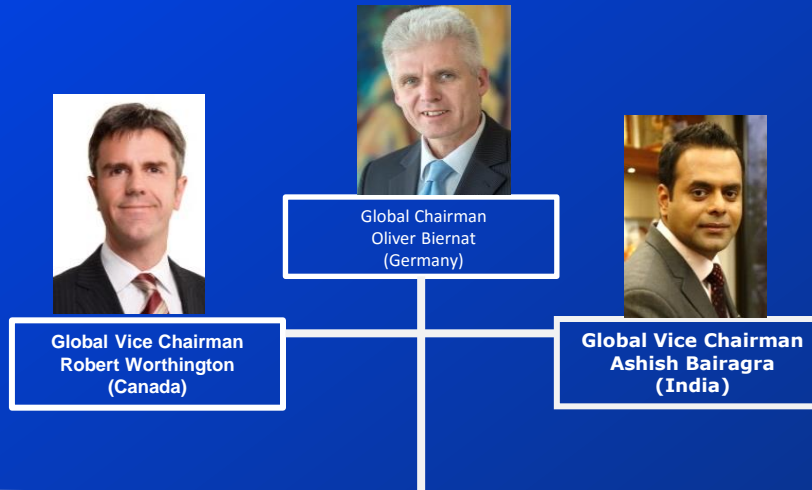
Oliver Biernat
ITPG Global Chairman

Agenda Internal Matters

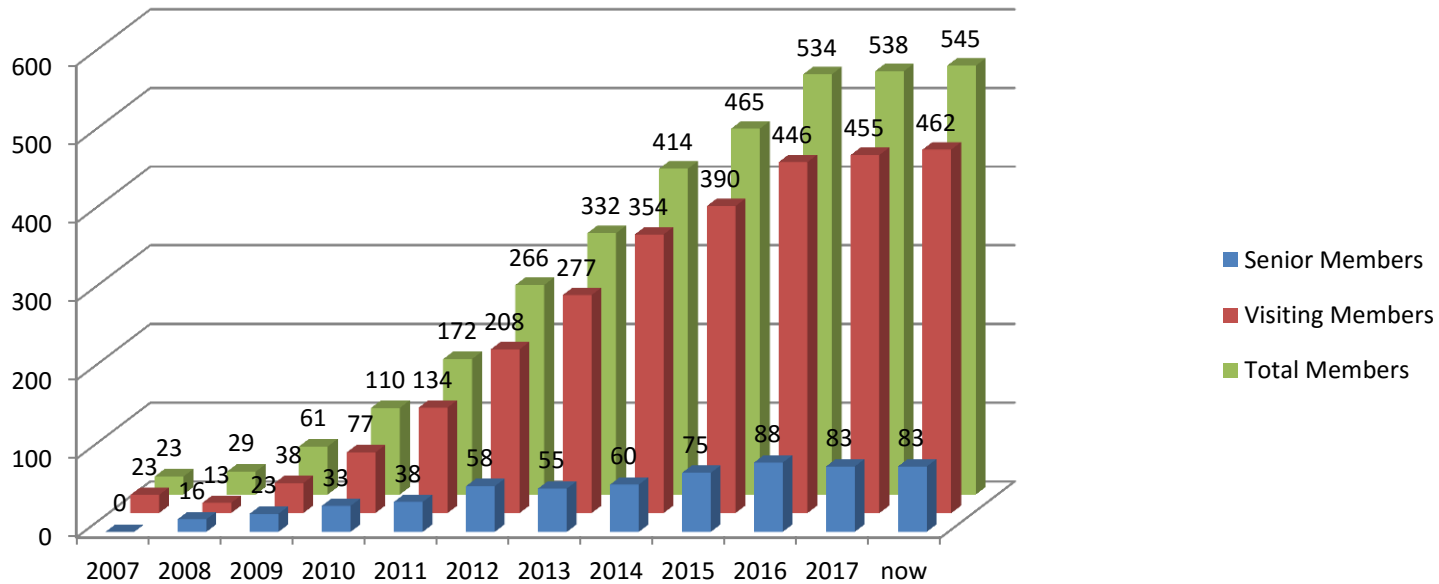


- Overview ITPG chairs and changes in senior members
- Statistics on the development of ITPG
- News from the regions
- ITPG Publications
- Comtax, IBFD & Bureau van Diyk
- Upcoming ITPG events
- Cooperation of members in Online Marketing
- Surprise
- Disclaimer

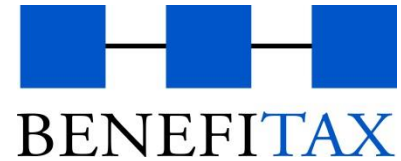
ITPG Chairs



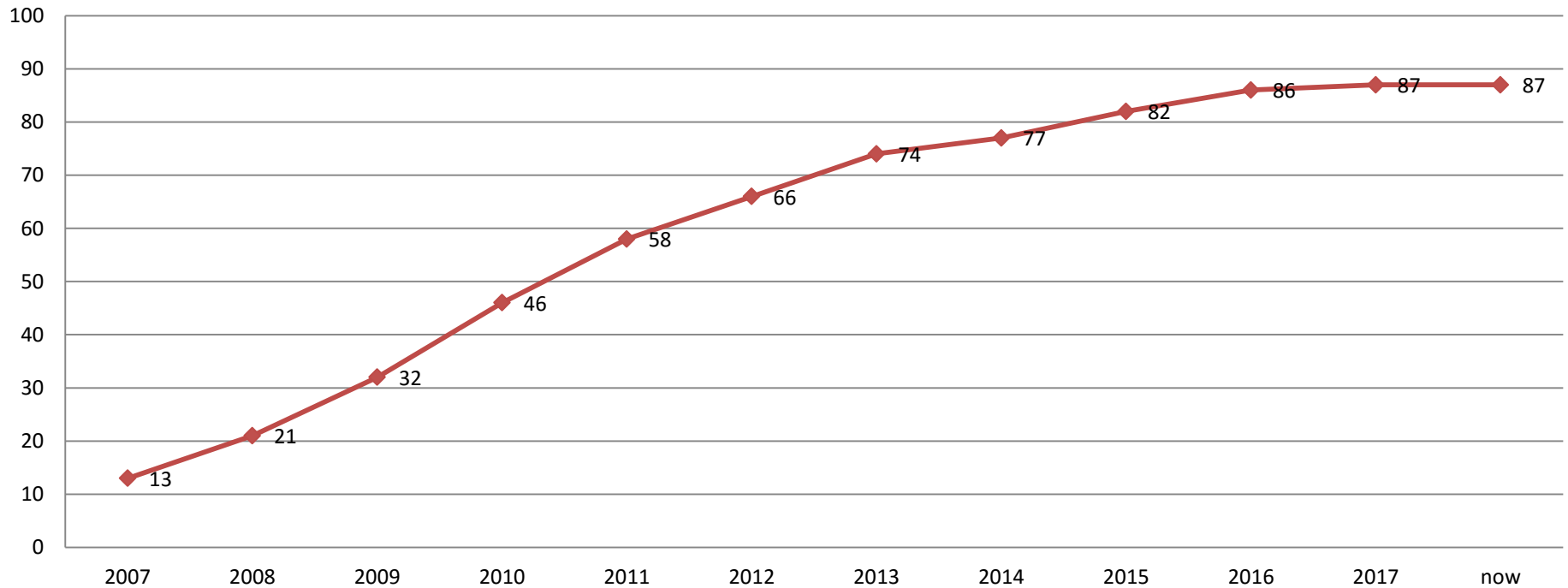
Statistics on the development of ITPG



Statistics on the development of ITPG



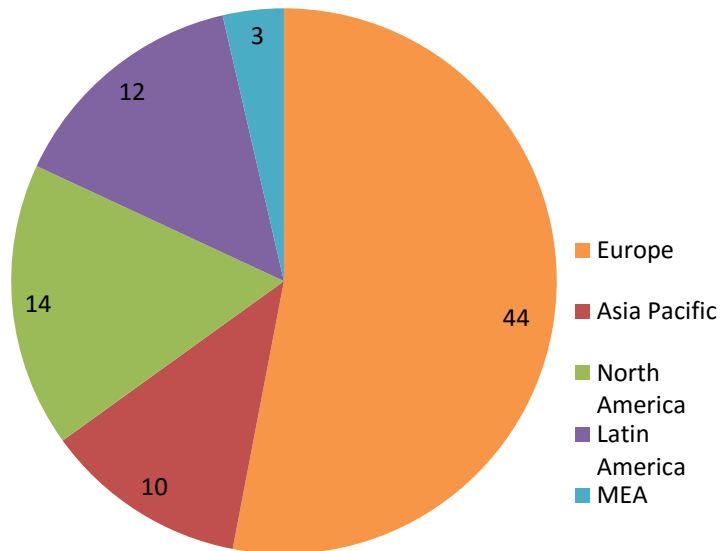
Number of countries covered by ITPG members



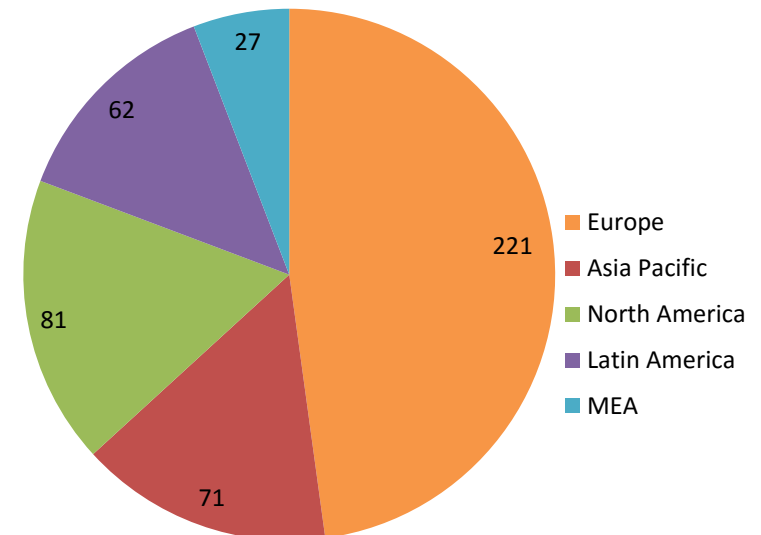
Statistics on the development of ITPG

Which region do our members come from at the moment?

Senior Members



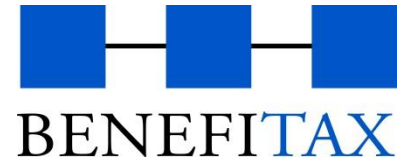
Members



Asia / Pacific (Ashish Bairagra / Ricky Wong / Ross Forrester)

- There was no ITPG Asia Pacific Region meeting in 2016 since the world conference was merged into the Asia Pacific Regional conference.
- In 2016 we had planned to update the version of the ITPG Asia Pacific Questionnaire on Regulatory and Tax Aspects for Expatriates. Though this could not be completed, the Global Mobility Solutions PG has decided to take this questionnaire on a global level and will initiate the process soon. Members who contributed to the first questionnaire will hear from them soon.
- The proposed project on Regulatory and Tax Aspects for Royalty and FTS payments has been pending for long. We will check the level of members interest to contribute to this project and then decide the course of action in 2017. If you are keen to contribute to this project, please do get in touch us.
- 2017 Meeting – to be held during the Asia Pacific Regional Conference in Nov. Online meetings yet to be planned, but we will have at least one during the year.

News from the regions



North America (Robert Worthington):

- The United States is likely to undergo a substantial tax reform.
- Legislative changes will likely take more than 1 year to complete.

Upcoming ITPG meetings in North America:

- North America Conference in May (Vancouver), and
- Best Practices Conference in September (Pittsburgh).

REGIONAL UPDATE

North America

An aerial photograph of Vancouver, Canada, showing the city's dense skyline of skyscrapers, the harbor with numerous boats, and the surrounding mountains under a clear sky.

GGI North American Regional Conference
Vancouver, Canada
June 22 – June 25, 2017

- **NEWS FROM MEA REGION (Graeme Saggars):**
 - 1. Still looking for an additional vice chairman from Middle East region preferably someone who deals with free trade zones
 - 2. GGI have added at least 3 new firms from the region. We have reached out to new firms to join the ITPG however have not had any response.
 - 3. Activity in the region has been slow from an international tax perspective as most governments are focusing on refining their legislation particularly with respect to transfer pricing. Slow economic growth across Africa has seen governments seeking to improve tax collections and administration.
 - 4. Next MEA regional conference is planned for early 2018 however date and venue has not been set.

- **Latin America (Sergio Guerrero):**
- LA ITPG Webex meetings will be held on 19/Apr/2017, 14/Sept/2017 and 07/Dec/2017
- LA Regional Conference - 29/Jun/2017-01/Jul/2017 at Santiago de Chile, Chile,
- ITPG meeting on Friday June 30th, 2017 at 14:00 Topics:
 - García Landa: “Outsourcing as a service provider for managing Human Resources”
 - Guerrero y Santana: “Tax considerations against Trump’s administration”
 - Acender: “Chile’s considerations and efficient structures after the Amnesty”
 - Still one space open to offer short tax presentation.
- ITPG FYI NEWSLETTER - Invitation for co-authored article on new Trump Border Tax – Repatriation Tax

Europe (Oliver Biernat):

IBS in Naples, 7th. April 2017 with a focus on Italian tax topics

(organized by Dr. Ugo Girardi)

- Andrea Fantozzi "tips and suggestion for Italian consultants assisting Italian investors in USA"
- Simona Cucchi "tips and suggestions for foreigner consultants assisting foreign investors in Italy"
- Campagnola Advisers "topic tbd"
- Oliver Biernat: ITPG internal matters and surprise

Europe (Oliver Biernat):

European Conference in Brussels, 11th. May 2017

(chaired and organized by Oliver Biernat)

- Oliver Biernat: ITPG internal matters and surprise
- Alan Rajah: Update on UK holding company structure
- Bärbel Wierzoch: Panel discussion on the how different countries treat netting finance costs within a group (loans, cash-pool, hybrid structures).
- ??? Olivier Bertin: The Belgian Tax innovation box
- Robert Frank/Jeff Mowery: Trump's US tax reform
- **Oliver Biernat: Panel discussion about tax compliance systems** and their benefits for clients and advisors. **Panellists wanted:**
- Filip Camps: "Taxtasting" of Belgian Beers, followed by beer tasting.

ITPG publications (1)

FYI newsletter (Robert Worthington)

- 2 editions per year, provided sponsor is found (who will get the lead article)
- Very short articles on tax changes as appetizers (max. 1,500 characters incl. blanks, lead article for sponsors only max. 3,000 characters incl. blanks)
- Detailed marketing section (name, contact data and photo of authors).
- Anita Szöke from GGI HO will coordinate (szoeke@ggi.com)
- Robert Worthington is editor in chief and will decide on topics, authors etc.
- In 2017 there will be two editions. One will be distributed in Brussels in May and one in Vienna in October. Sponsoring firms will be for the 1st. edition Allen Kutchins from Kutchins, Robbins & Diamond, Ltd. in Chicago /USA and for the 2nd. edition Dr. Sergio Finulli from COMMA 10 in Milan/Italy.



ITPG publications (2)

FYI newsletter Sponsorship

Advantages for sponsors of an edition:

- Lead article with double length (3,000 characters) than normal articles
- Advertisement (DIN A5) in the Newsletter (only promotional material of the sponsor)
- 50 printed copies of the Newsletter for free
- The sponsor will be mentioned by company name in the Editorial of the Newsletter
- The sponsor will be mentioned with company logo on the front page (in the online version with a link to their website)

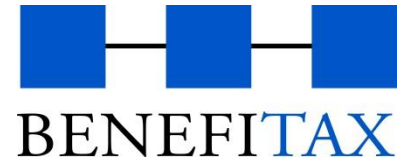
Costs:

- The sponsor will cover all expenses of the production of the Newsletter (graphic design, translation agency, print office, shipment) up to an amount of maximal EUR 1.200.

Question:

- **Who volunteers to be sponsor of a future edition in 2018?**

ITPG publications (3)

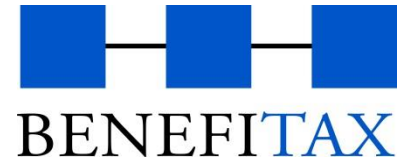


Insider (ITPG Pages)

- 6 editions per year
- Longer articles on tax issues with technical tax background (max. 6,000 characters incl. blanks)
- Marketing section (name, contact data and photo of authors).
- No sponsoring possible, no costs, longer waiting time
- Mags Leddy from GGI HO will coordinate (leddy@ggi.com)
- ITPG global chairman will decide on topics, authors etc.
- Who would like to publish something in the next edition

ITPG Tax and Business Guide (update not planned as of now)

Comtax Tax Planning software



- Tax calculation tool for 131 countries.
- 11 GGI members have subscribed for a Comtax license.
- License year from 1st. June -30th May .
- Termination possible with 3 month notice before end of license year.
- Free online demonstrations available.
- License fee: 2.000 € p.a. or less, in case more GGI members join (decreasing)
- More information on: <http://www.comtaxit.com/>

A) Full Membership:

- Includes all IBFD databases
- Minimum number of participants requested: 5 (reached)
- Total annual fee per block of 5 users is € 3,392 € per year and per user

B) Topical collection: Transfer Pricing

- Includes only Transfer Pricing data
- Minimum number of participants requested: 10 (not reached at the moment)
- Total annual fee per block of 10 users is € 409 per year and per single user

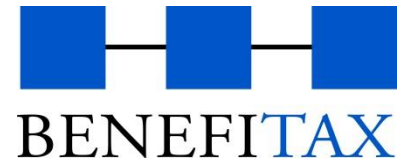
General information:

- Minimum duration of the subscription is 12 month with the same starting and end date for all participating members;
- License year: 1 March 28 February of the following year
- Please contact for more details, free online training or interest to license:
Pavel Grishunin, Regional Account Manager IBFD,
E: p.grishunin@ibfd.org | M: +31623951715 | T: +31205540184

Bureau van Dijk

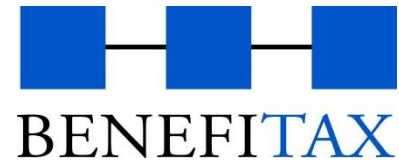
- BvD's product range includes databases of company information and business intelligence for individual countries, regions and the world.
- Their global database, Orbis, combines information from more than 140 sources and covers close to 180 million companies. BvD's TP Catalyst simplifies the execution of transfer pricing analyses and benchmark studies.
- Offer from BvD for TP Catalyst: 50 k€ per licensee with unlimited access annually or 5 K€ per case.
- Pro's: good database, also used by all major advisory firms and tax authorities, rising need for TP documentation
- Con's: expensive, not easy to handle if not done on a regular basis. If we share a license neither GGI HO nor a GGI member is ready to accept liability in case not sufficient members use it and pay for it.

ITPG Meetings 2017/18



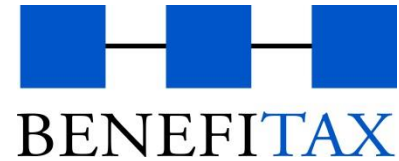
- 07 April 2017: Naples, Italy, Italian Business Summit (Ugo Girardi)
- 11 May 2017: Brussels, Belgium, GGI European Regional Conference (Oliver Biernat)
- 23 June 2017: Vancouver, Canada: North America Conference (Doug Dickey)
- 29 June 2017: Santiago de Chile, Chile: Latin American Conference (Sergio Guerrero)
- 21 Sept. 2017 (tbc): Best Practices Conference , Pittsburgh PA, North America (Doug Dickey)
- 19 Oct. 2017: Vienna, Austria: GGI World Conference (Oliver Biernat)
- 30 Nov. 2017: Bali (tbc) GGI Asia-Pacific Regional Conference (Ashish Bairagra)
- .???? 2018: in Marbella, Spain (tbc), ITPG Global Tax Summit 2018 (Robert Worthington)
- 19 April 2018: Berlin, Germany: GGI European Regional Conference (Oliver Biernat)
- WebEx Conferences (Latin America, the MEA region and Australia/New Zealand)

ITPG Meetings 2017/18



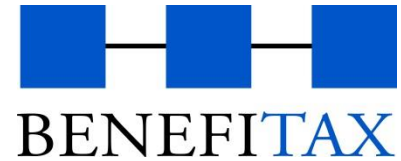
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- **21 Sept. 2017 (tbc):** Best Practices Conference , Pittsburgh PA, North America (Doug Dickey)
- 19 Oct. 2017: Vienna, Austria: GGI World Conference (Oliver Biernat)
- 30 Nov. 2017: Bali (tbc) GGI Asia-Pacific Regional Conference (Ashish Bairagra)
- **.???? 2018:** in Marbella, Spain (tbc), ITPG Global Tax Summit 2018 (Robert Worthington)
- 19 April 2018: Berlin, Germany: GGI European Regional Conference (Oliver Biernat)
- **WebEx Conferences (Latin America, the MEA region and Australia/New Zealand)**

Cooperation of members in Online Marketing



- Include backlinks to other ITPG members' homepage on your own homepage
- Include articles from other ITPG members in your company's newsletter
- Add all ITPG members as friends in Social Media. Like or share what they post.
- Confirm expert knowledge of other members in LinkedIn
- Make interviews with other GGI members and put them online
- Mention or link ITPG or other members activities on your own website /YouTube Channel or distribute in Social Media (e.g. articles in FYI ITPG newsletter, presentations at meetings like panel discussions your firm was involved in, having worked together on a successful project, etc.)

Disclaimer



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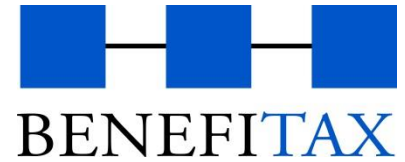
Surprise

Why should you join the Yoga session this evening?

Ashish will tell you the secret of how to live even longer!!!

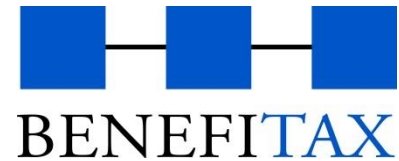


Surprise



See what we did in the past in ITPG

Thank you for your attention !



Oliver Biernat

[Benefitax GmbH](#)

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