

Agenda ITPG Meeting Brussels 2017



2:30 p.m. and 4:30 p.m. on 11th May 2017.

2:30 - 2:50 Oliver Biernat: Slideshow „past ITPG winter meetings“, Internal ITPG topics

2:50 - 3:10 Alan Rajah: "UK Holding company – substantial shareholding exemption"

3:10 - 3:30 Olivier Bertin: “The Belgian Tax innovation box”

3:30 - 4:00 Robert Frank and Jeffery L. Mowery : „Taxes in Trump’s America“

4:30 - 4:50: Oliver Biernat: “Implementation and review of Tax Compliance Management Systems: Benefits for clients and their tax advisors“

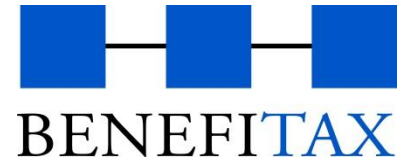
4:50 - 5:30: Bärbel Wierzoch: „Panel discussion on how different countries treat netting finance costs within a group (loans, cash-pool)“. Panelists: Rusudan Shervashidze (USA), Attila Kovács, (Hungary), Werner Prenner (Austria), Julie Bryant (UK) and Tobias Wilhelm (Switzerland).

5:30 - 6:00: Sven Cornelis: „Taxtasting of Belgian Beers“ and spectacular video about the ITPG Global Tax Summit 2017 in Austria

Internal ITPG Topics

Oliver Biernat
ITPG Global Chairman

Agenda Internal Matters

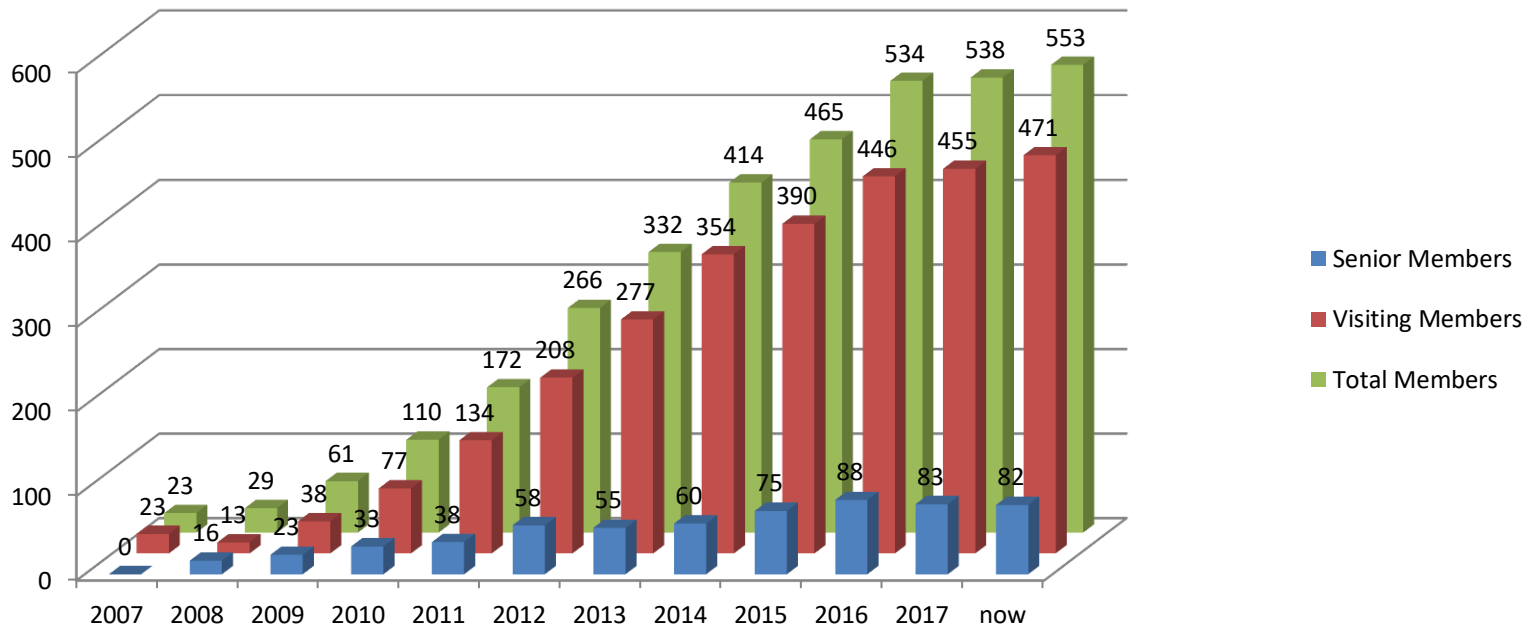


- Overview ITPG chairs and changes in senior members
- Statistics on the development of ITPG
- News from the regions
- ITPG Publications
- Comtax, IBFD & Bureau van Diyk
- Upcoming ITPG events
- Cooperation of members in Online Marketing

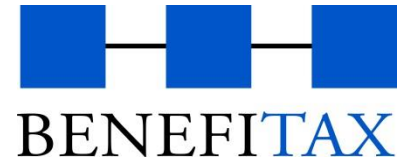
ITPG Chairs



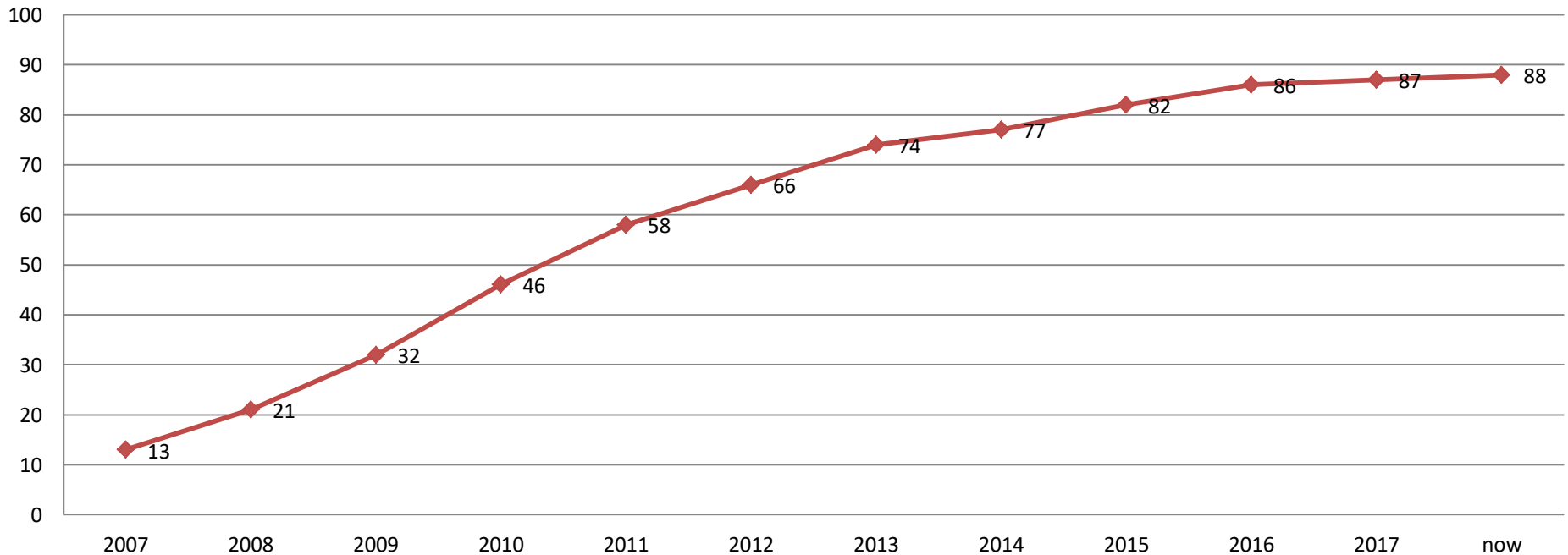
Statistics on the development of ITPG



Statistics on the development of ITPG



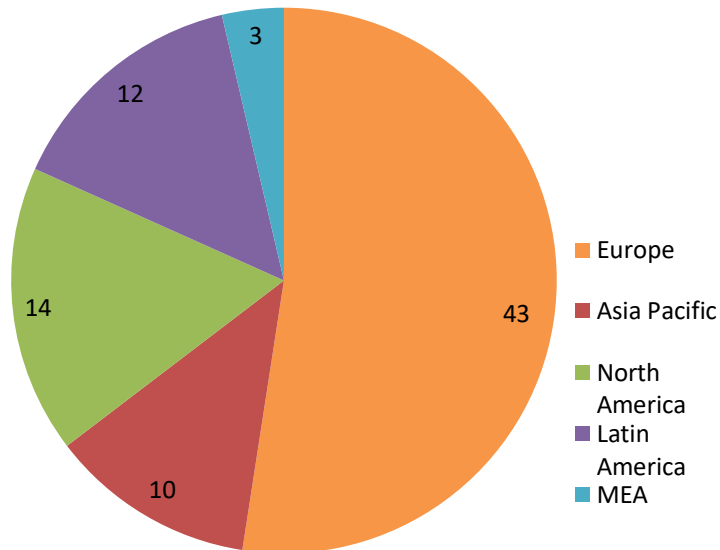
Number of countries covered by ITPG members



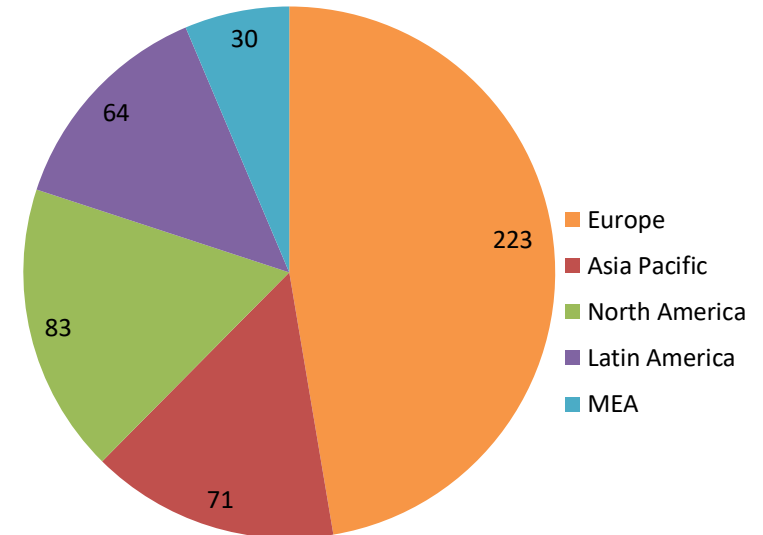
Statistics on the development of ITPG

Which region do our members come from at the moment?

Senior Members



Members



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

- 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 Bali (Indonesia) on 3rd December 2017 (tbc). This will be a joint meeting with the Indirect Tax PG and a panel discussion is planned for this meeting.
- Online meetings yet to be planned, but we will have atleast one during the year.

Latin America (Sergio Guerrero)

- LA ITPG Webex meetings will be held on 14/Sept/2017 and 07/12/2017
- UPCOMING EVENTS - LA Regional Conference - 29/Jun/2017-01/Jul/2017 at Santiago de Chile, Chile

Jorge García Landa - García Landa	“Outsourcing as a service provider for managing Human Resources”
Sergio Guerrero - Guerrero y Santana	“New era of global tax digitalization”
Chile	“Chile’s considerations and efficient structures after the Amnesty”
Fernando Martins - Wfaria Advogados	“Brazilian greenfield investment scenarios and tax considerations”

- ITPG FYI NEWSLETTER - Sponsorship available: Lead article and half page advertisement at the back page.
- Invitation for co-authored article on new Trump Border Tax – Repatriation Tax

MEA Region (Graeme Siggers)

- Still looking for an additional vice chairman from Middle East region preferably someone who deals with free trade zones
- 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.
- 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.
- Next MEA regional conference has been provisionally planned for 16 – 18 Feb 2018 in **MARRAKEH, MORROCO**. This is less than a 4 hour flight from most places in Europe so we invite all member firms to join us!

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)
 1. The effect of lower corporate tax rates on US/ Canada cross-border structures
 2. Nonresident Aliens with US Assets may still have to file US Estate Tax Returns
 3. US and Canadian reporting of foreign retirement plans
 4. The process and criteria to make someone a partner
- 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 filled with boats, and the surrounding mountains under a clear sky.

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

Europe (Oliver Biernat)

- Successful ITPG meetings 2017 held in Schladming and Naples.
- Video about Schladming: <https://www.youtube.com/watch?v=YbzFhYsxw1Y>
- Introduction of European ITPG Chairs:
 - Regional Chairman: Oliver Biernat,
 - Vice Chairmen: Julie Bryant, Sergio Finulli.
- Award from “Handelsblatt” as “Germany’s Top Tax Advisors 2017” to:
Kieffer Stübben (Düsseldorf), Connex (Leipzig), DITGES (Bonn), Benefitax (Frankfurt)

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 now and one will be distributed 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)

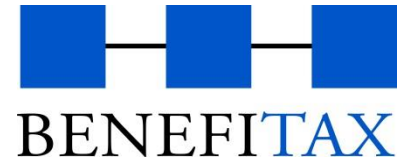
Costs:

- 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 a sponsor in 2018?**

ITPG publications (3)

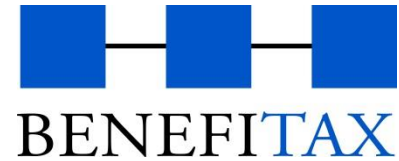


Insider (ITPG Pages)

- 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



- Fast tax calculation tool for 131 countries.
- 9 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: 2.222 € p.a. (on the basis of 9 GGI members sharing a license in 2017/18) or less, in case more GGI members join (decreasing fees)
- 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

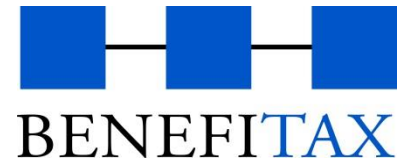
General information:

- 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,
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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



- 22 June 2017: Vancouver, Canada: North America Conference (Doug Dickey)
- 30 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), joint meeting with the Indirect Taxes PG
- 22 -25. Feb. 2018: in Marbella, Spain, 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)

Looking for topics/speakers for Vienna:

Two major challenges for CPA firms: digitalization and staff recruitment

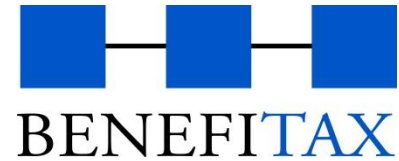
Fixed:

- Panel discussion on changes of the accountant's work by digitalization. Possible Panelists: Knut Einar Rishovd, Seres Baum, Sergio Guerrero, Son of Richard Jahoda.
- Introduction of the GST in India (Raghu Marwah)

Ideas:

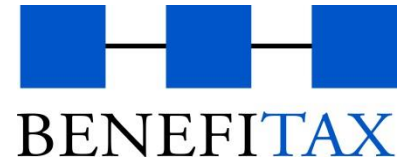
- The artificial tax advisor (shall declare taxes and travel expenses, e.g. Siemens).
- Outsourcing of tax departments to CPA firms (e.g. General Electric to PWC).
- Improve the attractiveness of your firm as an employer. “Great place to work” or “Gallup-contests” check how happy your employees are and help you to improve.

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 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 publish them
- 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.)
- Give a 5 star review in Google or Facebook about another GGI member firm

Disclaimer



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Thank you for your attention !



Oliver Biernat

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