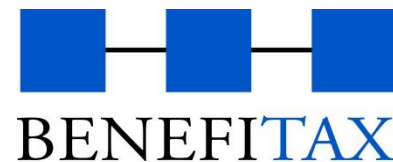


Internal ITPG Topics

Oliver Biernat
ITPG Global Chairman

Agenda Internal Matters



- Overview ITPG chairs
- Statistics on the development of ITPG
- News from the regions
- ITPG Publications
- Comtax, IBFD & Bureau van Diyk
- Upcoming ITPG events
- ITPG awards
- Disclaimer

ITPG Chairs



**Regional
Chairman
Middle East Africa**
Graeme Siggers
(South Africa)



**Regional Chairman
Europe**
Oliver Biernat
(Germany)



**Regional Chairman
Asia-Pacific**
Ashish Bairagra
(India)



**Regional Chairman
North America**
Doug Dickey
(USA)



**Regional Chairman
Latin America**
Sergio Guerrero
(Mexico)



**Regional Vice
Chairman
Middle East Africa**
Abdulateef Olatunji
Abdulrazaq (Nigeria)



**Regional
Vice
Chairman
Europe**
Bärbel
Wierzoch
(Germany)



**Regional
Vice
Chairman
Europe**
Julie
Bryant
(UK)



**Regional
Vice
Chairman
Europe**
Sergio
Finulli
(Italy)



**Regional
Vice
Chairman
Asia-Pacific**
Ross
Forrester
(Australia)



**Regional Vice
Chairman
Asia-Pacific**
Ricky WP
Wong
(China, Hong
Kong)



**Regional Vice
Chairman
North America**
Robert
Worthington
(Canada)



**Regional Vice
Chairman
North America**
Jeff Mowery
(USA)

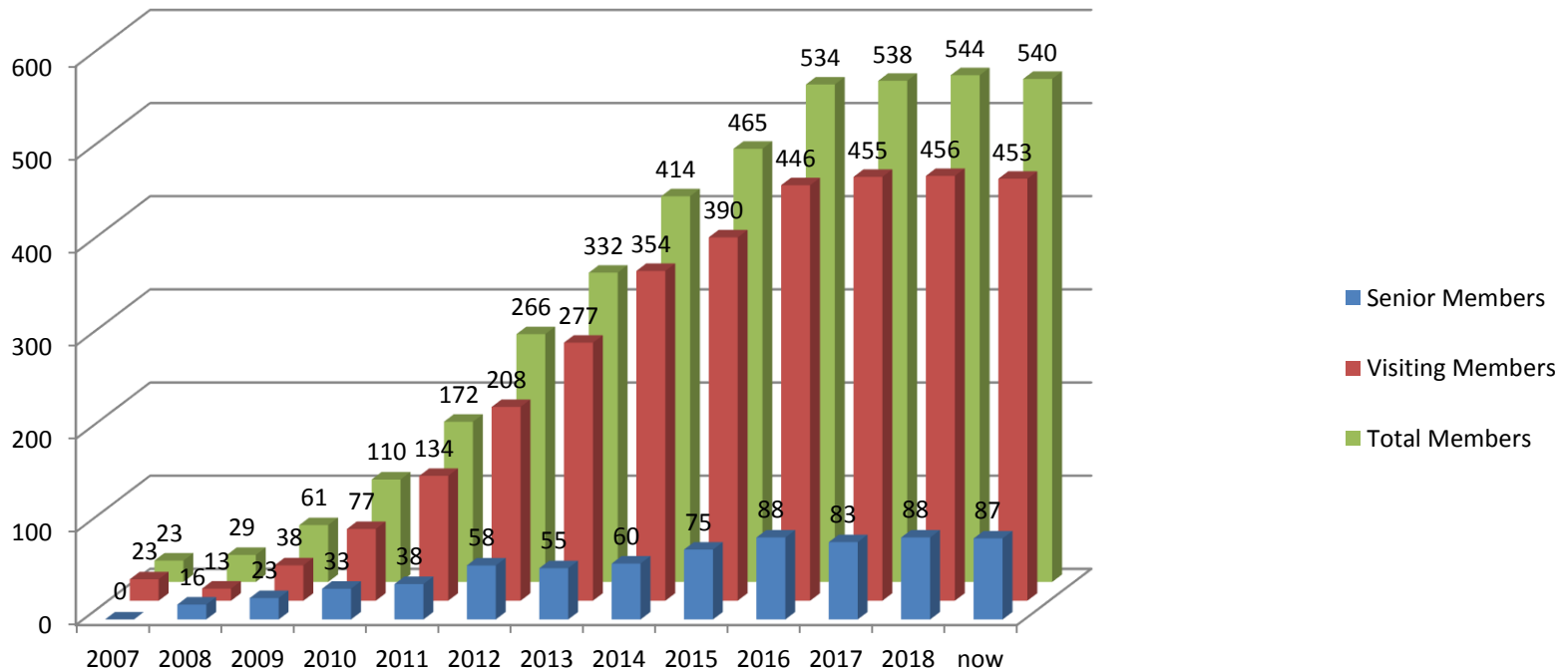


**Regional Vice
Chairman
Latin America**
Angel Gabriel
Viso
(Venezuela)

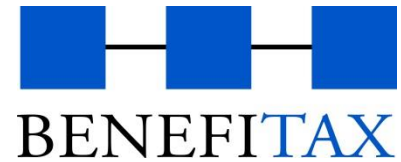


**Regional Vice
Chairman
Latin America**
Seres Baum
(Brazil)

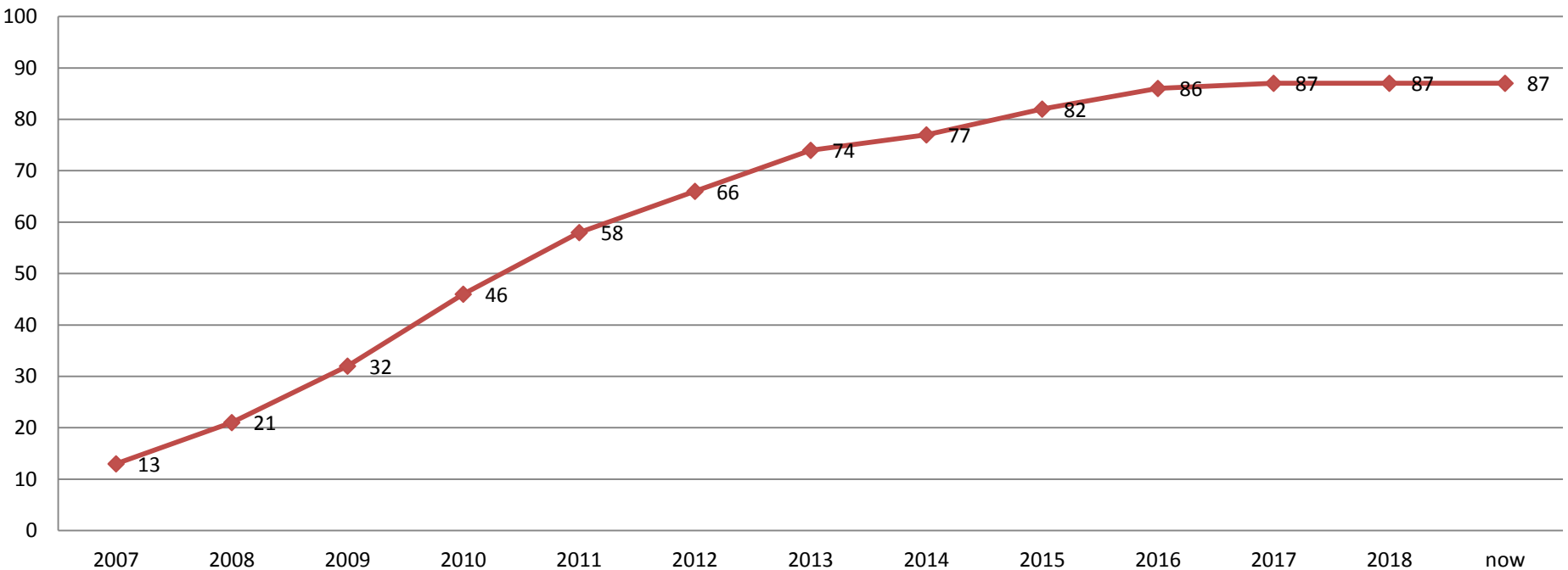
Statistics on the development of ITPG



Statistics on the development of ITPG



Number of countries covered by ITPG members



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

- 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 2018. If you are keen to contribute to this project, please do get in touch us.
- We may plan an online ITPG AP meeting to compensate for the cancelled meeting (which was to be held in Bali) and will keep you posted.
- The next ITPG meeting for the AP region will be held in Bali during the AP Regional Conference from 28th – 31st November 2018.
- In case you are keen to present during any of the ITPG AP meetings, please contact us.

Europe (Oliver Biernat)

Possibilities in 2018 to attend ITPG meetings in Europe:

- Marbella (now)
- IBS in March 2018 was cancelled – no ITPG meeting
- European regional conference in Berlin in April: Draft agenda:
 - Olga Ottstadt (tbc): The choice of a holding location considering the tax aspects
 - Robert Frank & Jeffery L. Mowery: an outline of Trump's US tax reform. The ITPG European chairs will give them a hard time with a controversial discussion on the impact for Europeans.
 - Edward Hendrickx and Andre Groeneveld: EU data protection rules for tax professionals
 - Robert Anthony: Presentation and round table discussion: Can one today hide in an ever public digital world? Is being offshore a paradise or a future hell?

Latin America (Sergio Guerrero)

- LA ITPG Webex meetings will be held throughout the year 2018.

2018
April 10 th , 2018
July 10 th , 2018
November 13 th , 2018

- UPCOMING EVENTS – LA Conference may be held during 2018, before Worldwide Conference in Buenos Aires, Argentina.

MEA Region (Graeme Siggers)

- Report from ITPG meeting at the MEA regional conference 16 – 18 Feb 2018 in MARRAKECH, MORROCO.

North America (Robert)

- ITPG meeting will be held at the North American Conference in Denver on 21 June 2018.
- Agenda:
 - Doing Business In Canada and Canadians Doing Business in the U.S.
 - USA – 2017 Tax Cuts and Jobs Act – Provisions effecting businesses in the U.S.
 - USA – 2017 Tax Cuts and Jobs Act – Provisions effecting international business
 - Panel Discussion on U.S. Tax Reform

ITPG publications (1)

FYI newsletter (Robert Worthington)

- 2 editions per year, provided sponsor for 2018 has been found (who will get the lead article)
- Very short articles on tax changes as appetizers (max. 2,000 characters incl. blanks, lead article for sponsors only max. 3,000 characters incl. blanks)
- Detailed marketing section (name, contact data and photo of authors).
- Julia Benn from GGI HO will coordinate (benn@ggi.com)
- Robert Worthington is editor in chief and will decide on topics, authors etc.
- In 2018 there will be two editions. One will be distributed in Berlin in April and the second in Buenos Aires. Sponsoring firm for both editions is Allen Kutchins from Kutchins, Robbins & Diamond, Ltd. in Chicago /USA. Thank you!



ITPG publications (2)

FYI newsletter Sponsorship

Advantages for sponsors of an edition:

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

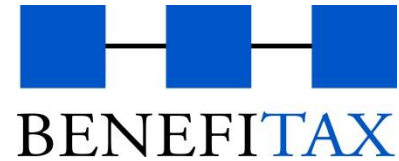
Costs:

- 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.

Sponsor 2019:

- Who is interested (apart from Allen)?

ITPG publications (3)

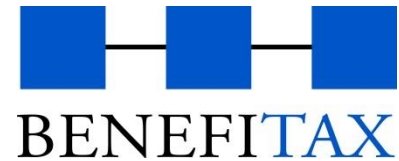


Insider (ITPG Pages)

- 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
- Barbara Reiss from GGI HO will coordinate (b.reiss@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: Who volunteers to do it?

COMTAX Tax Research & Planning software



- Fast tax calculation tool and comprehensive worldwide commentaries for 131 tax jurisdictions.
- Comes with many more useful features e.g. Tax Calendar, Ratefinder, Capital Gains, Thin Cap, Entity Manager, BEPS-Tracker.
- 9 GGI members are subscribing to COMTAX.
- License year from 1st. June -30th May.
- Termination possible with 3 month notice before end of license year.
- License fee: 2.000 € p.a. in case 10 GGI members join (fee decreasing, if more)
- Find more information on: <http://www.comtaxit.com/>
- To get in touch: christoffer.asmundsson@comtaxit.com
- Free online demonstrations/webinars available. Who is interested?

A) Full Membership:

- Includes all IBFD databases. More information can be found here: <https://www.ibfd.org/IBFD-Tax-Portal/About-Tax-Research-Platform>
- Minimum number of participants requested: 5 (reached)
- Total annual fee per block of 5 users is € 3,599 € ex VAT per year and per user, € 4,495.75 ex VAT for 4 users. **So far only 4 members signed up! Who else?**

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.

At a travel agency in Shanghai, I asked the Chinese girl behind the counter if she could escort me on a city tour and asked for her cell number so I could call her.

She gave me a big smile, nodded her head and said,
"Sex sex sex, wan free sex for tonight".

I replied, "Wow, you Chinese women are really hospitable!"

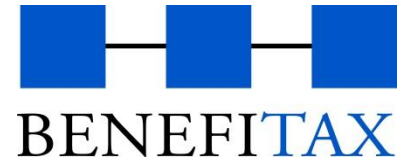
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She gave me a big smile, nodded her head and said,
"Sex sex sex, wan free sex for tonight".

I replied, "Wow, you Chinese women are really hospitable!"

A guy next to me overheard, tapped on my shoulder and said, "What she really said was: 666136429."

ITPG Meetings 2018



- 19 April 2018 Berlin, Germany: European Conference (Oliver Biernat)
- 21 June 2018 North American Conference, Denver/CO/USA, (Doug Dickey)
- 18 Oct. 2018, World Conference, Buenos Aires/Argentina, (Oliver Biernat)
- 30 Nov. 2018, Asia-Pacific Conference, Bali/Indonesia, (Ashish Bairagra)
- WebEx Conferences (Latin America, the MEA region and Australia/New Zealand)

New feature:

ITPG will give two awards to ITPG members who did an outstanding presentation at an ITPG meeting each year, starting in 2018.

- a. best tax presentation:
- b. the most innovative speaker:

Right to vote: All ITPG members who participated in the respective ITPG meetings

Purpose: Incentive for quality topics and speeches and for target group-oriented and innovative speeches.

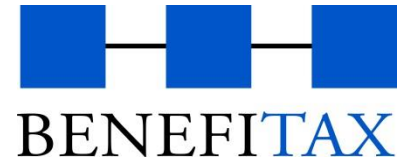
And the winners are:

- a. Award for the best tax presentation: ??? (33,3% of all votes)
- b. Award for the most innovative speaker: ??? (also 33,3% of all votes)

The winners get:

- a certificate,
- a tombstone (crystal trophy)
- a GGI press kit:
 - press announcement,
 - introduction of the winners in the March INSIDER issue,
 - allowed to use an „award logo“ for 12 months in emails on your homepage etc.

Disclaimer



The presentations are for internal use only. Presenters are solely responsible for the contents in their presentations, which have been prepared from data assumed to be correct at the time and from reliable sources. The contents within any presentation do not necessarily reflect the opinion of GGI or the ITPG Chairperson(s), and therefore no guarantee is implied or liability accepted.

Thank you for your attention !



Oliver Biernat

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Steuerberatungsgesellschaft Wirtschaftsprüfungsgesellschaft
(Tax Consultants and German Public Auditors)

Hanauer Landstraße 148a

60314 Frankfurt am Main

Tel. 069 – 25 62 27 60

Fax 069 – 25 62 27 611

info@benefitax.de

www.benefitax.de

