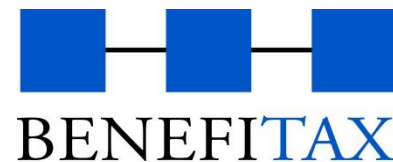


# ITPG Internal Matters

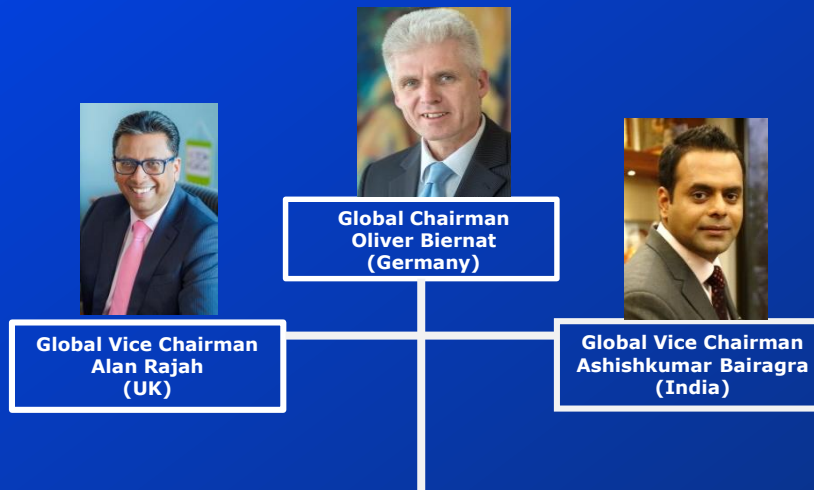
Ashishkumar Bairagra  
ITPG Global Vice-Chair

# Agenda Internal Matters



- Overview ITPG chairs
- Statistics on the development of ITPG
- New ITPG Senior members
- News from the regions
- ITPG Publications
- Comtax, IBFD & Bureau van Dijk
- 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  
Ashishkumar Bairagra  
(India)**



**Regional Chairman  
North America  
Jeff Mowery  
(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  
Fernando Lopez  
(USA)**



**Regional Vice  
Chairman  
North America  
Sébastien  
Lebrun  
(Canada)**

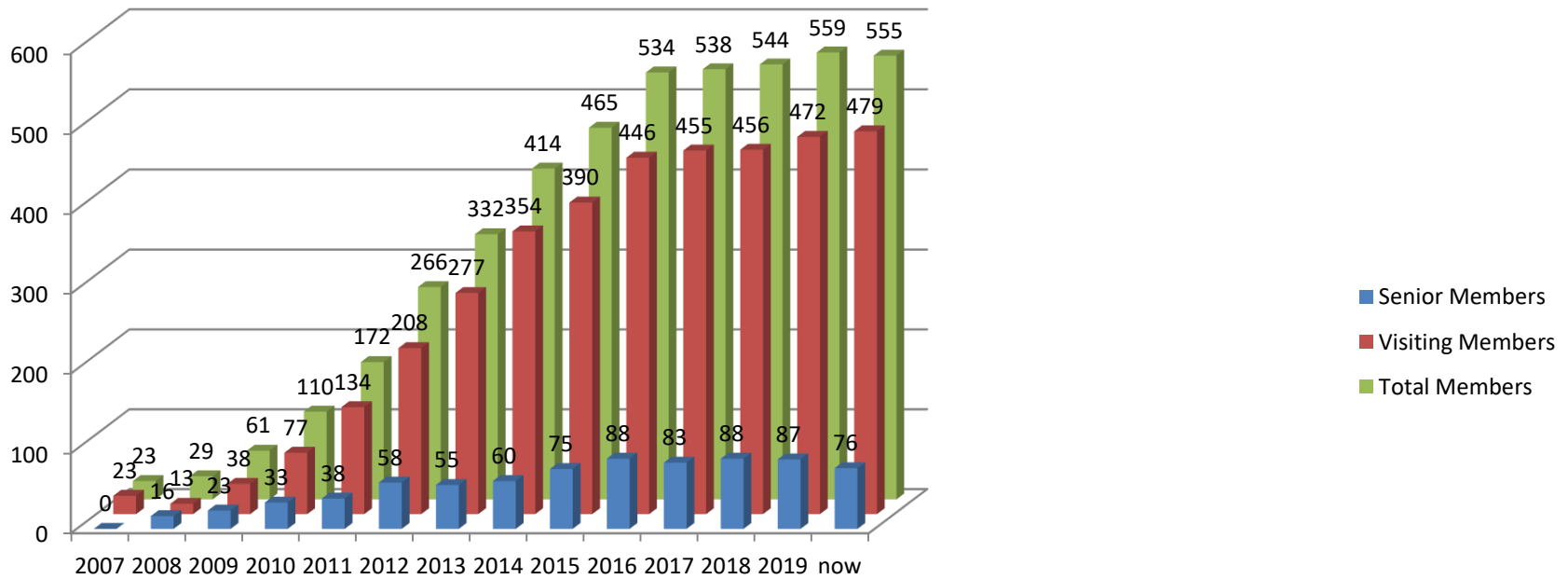


**Regional Vice  
Chairman  
Latin America  
Angel Gabriel  
Viso  
(Venezuela)**



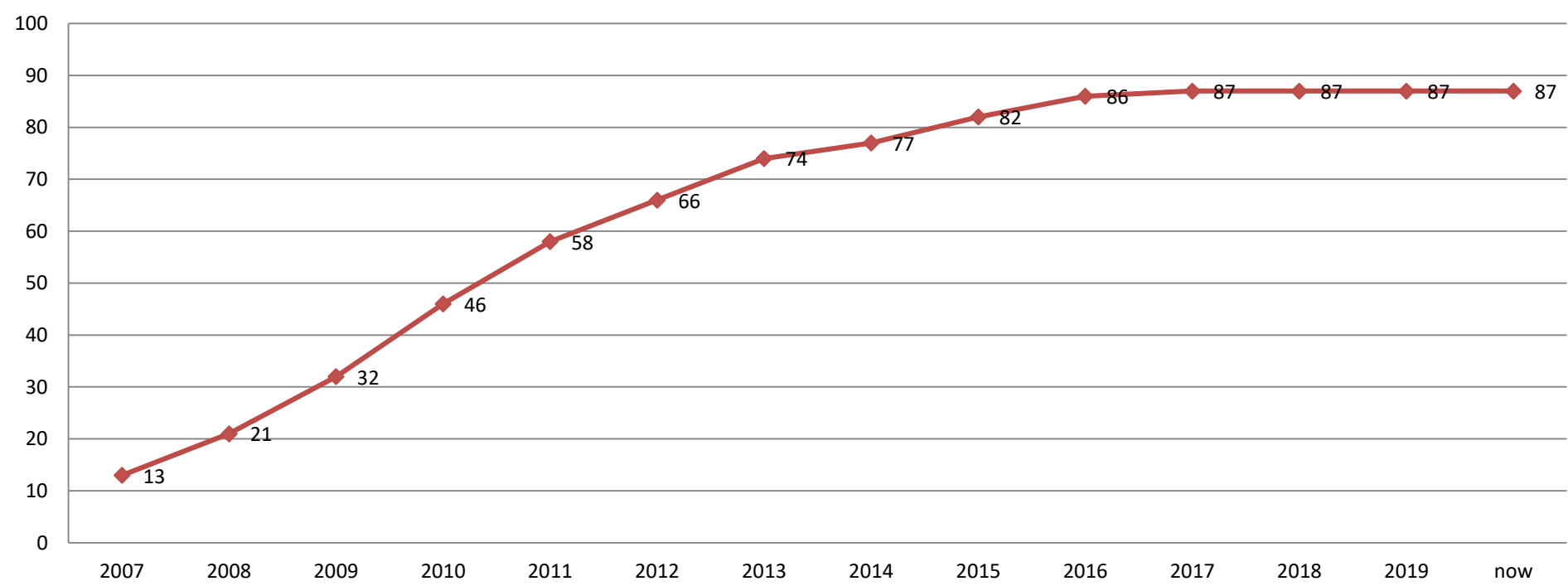
**Regional Vice  
Chairman  
Latin America  
Seres Baum  
(Brazil)**

# Statistics on the development of ITPG



# Statistics on the development of ITPG

## Number of countries covered by ITPG members



# New ITPG Senior members



Country	Firm	Name	First Name
Australia	Kelly + Partners Chartered Accountants	Nunes	Tony
Canada	Labranche Therrien Daoust Lefrancois	Labranche	Yves
Germany	KPP Steuerberatungsgesellschaft mbH	Fransen	Uwe
Italy	STUDIO TRIBUTARIO CAGNAZZO	Cagnazzo	Roberto M.
Luxembourg	Engelwood	Verlaine	Jean-Pierre
Switzerland	Bonnfous & Cie SA	Bonvin	Sandrine
The Netherlands	EJP Accountants & Adviseurs	Hendrickx	Edward
The Netherlands	EJP Accountants & Adviseurs	Groeneveld	Andrè
United States	Frank & Company, p.c.	Frank	Matthew
United States	Thorn Law Group PLLC	Thorn	Kevin

### **Asia / Pacific (Ashishkumar 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 2019. If you are keen to contribute to this project, please do get in touch us.
- Online ITPG AP meetings are planned once in two months, to be led by Ross Forrester. A common case study has been developed and in each online meeting, 1 or 2 members will present their countries view on that case study. If you wish to present on the case study in the online meeting, please get in touch with Ross Forrester to register for the upcoming or future online meetings.
- In case you are keen to present during any of the ITPG AP meetings, please contact Ashishkumar Bairagra.

## Europe (Oliver Biernat)

- For the ITPG meeting 2019 at the European conference we plan to present a role-play which will be prepared in Tel Aviv in Feb. 2018. It will include aspects from:
  - transfer pricing/substance requirements,
  - fighting against the accusation of tax evasion,
  - knowing about advantages and risks of low tax regimes or
  - insolvency proceedings.
- Julie Bryant will chair a panel discussion on what is happening with Brexit - effects on business both in the UK and in the rest of the EU.
- Dr. Sergio Finulli will talk about the ATAD Directive 2016/1164 (Anti Tax Avoidance Directive) which should be implemented by 1<sup>st</sup>. Jan. 2019.
- Bärbel Wierzoch will discuss secondary declaration duties of small subsidiaries of larger groups, if the group is affected by Country-by-Country-Reporting.
- Alan Rajah will talk about AI and digital transformation in accounting firms



### Latin America (Sergio Guerrero)

- LA ITPG Webex meetings will be promoted for more participation of GGI Members. All GGI members of the Region shall be invited in order to increase the regional ITPG membership. Dates should be scheduled in advance.
- UPCOMING EVENTS – GGI Pan-American Regional Conference in Houston, Tx. (June 20-23, 2019) and GGI ITPG Conference in Houston, Tx. (June 21, 2019)
- ITPG FYI Newsletter – Invite ITPG members to write articles about International Tax matters
- Increase the exchange with the North American Region. Eg. Webex meetings
- Create task forces for special cases: Transfer pricing, double taxation treaties, etc.

## MEA Region (Graeme Saggars)

- We are sorry that Olatunji (Nigeria) and Graeme (South Africa) were unable to make it to Tel Aviv
- The two of us had a successful meeting in Johannesburg in late 2018 and discussed some content ideas that we hope to pitch to the group to get more interaction from our region. Stay tuned.
- We are looking forward to welcoming the ITPG members into our region for World Conference taking place in Marrakech in September 2019.
- To all our friends in Tel Aviv, we hope you have a good and productive time... Shalom!

## North America (Jeff Mowery)

- Jeff Mowery has taken over as North American ITPG Chairman. We thank Robert Worthington for serving as North American Chairman. Jean Sebastien Lebrun from Ravinsky, Ryan, Lemoine, LLP in Montreal has taken over as North American Vice-Chairman along with Fernando Lopez from Prager Metis.
- There will be a joint regional conference between the North American and Latin American Regions from June 20 – June 22, 2019 in Houston. The ITPG meeting will be held at the Pan-American Conference on 20 June 2019 in Houston. It will be a combined ITPG meeting with the North American and Latin American regions of the ITPG.
- The agenda for the meeting is displayed on the next page-

## Agenda for the ITPG Pan American Meeting to be held in Houston – June 2019

- 2:00 – 2:15 – ITPG Update – Jeff Mowery/Sergio Guerrero
- 2:15 – 2:45 – Hybrid M & A Transactions in Canada – Jean Sebastien Lebrun & Ben Jeske from Ravinsky, Ryan, Lemoine, LLP in Montreal
- 2:45 – 3:45 – Regulatory Pronouncements Relating to 2017 US Tax Reform
  - Foreign Aspects – Fernando Lopez – Prager Metis
  - Case Studies on sections 199A and 163(j) under US Tax Reform – Pam Roberts from JTaylor in Fort Worth.
- 3:45- 4:00 – Refreshments
- 4:00 – 4:30 – Marketing Tax Services – Christine Hollinden from Holliden Marketing in Houston
- 4:30 – 4:45 – Considerations for foreign investments – due changes in Mexico Tax Regime – Sergio Guerrero from Guerrero Santana
- 4:45 – 5:00 – Tax Haven – the birth, growth and the OECD wall – Seres Baum from Grupo

# ITPG publications (1)

## FYI newsletter

2 editions per year, provided sponsor has been found

- Very short articles on tax changes as appetizers (max. 2,000 characters incl. blanks)
- Detailed marketing section (name, contact data and photo of authors).
- Aleksandra Jagiello from GGI HO will coordinate ([jagiello@ggi.com](mailto:jagiello@ggi.com))
- Spring 2019 edition is full (max 15 contributions)
- Oliver Biernat is editor in chief and will decide on topics, authors etc.
- In 2019 we plan two editions (spring and autumn). Sponsoring firm for both editions is Allen Kutchins from Kutchins, Robbins & Diamond, Ltd. in Chicago /USA. Thank you!



## **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.

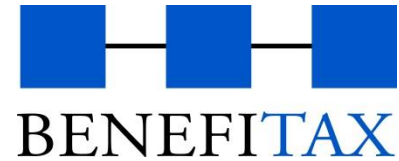
Future Sponsors:

- Who is interested (apart from Allen)?

### FYI special newsletter (NEW!)

- One topic, several authors describe this topic for their own country
- Max. 1 author per country (or 2 if the are co-authors from the same firm)
- 1 or 2 editions per year, provided funds are available and at least 6 authors
- Technical contribution must be between 4,500 - 7,500 characters incl. blanks
- Technical contribution must be exclusively subject-related
- Detailed separate marketing section (name, contact data, photo of author).
- No lead article, no printouts – only digital version
- Barbara Reiss from GGI HO will coordinate ([b.reiss@ggi.com](mailto:b.reiss@ggi.com))
- Oliver Biernat is editor in chief
- First edition on “Taxation of Cryptocurrencies” has just been released

# ITPG publications (4)



## Insider (ITPG Pages)

- 6 editions per year
- One longer article on tax issues with technical tax background per edition (max. 6,000 characters incl. blanks)
- Marketing section (name, contact data and photo of authors).
- No sponsoring possible, no costs, longer waiting time
- Interested authors should contact Aleksandra Jagiello from GGI HO ([jagiello@ggi.com](mailto:jagiello@ggi.com))
- ITPG global chairman will decide on topics, authors etc.
- Who would like to publish something in the next editions
- INSIDER Last submission due dates for 2019: March 2019 – on 05 March 2019, May 2019 – on 02 May 2019, July 2019 – on 02 July 2019, September 2019 – on 03 September 2019, November 2019 – on 05 November 2019



- Fast tax calculation tool and comprehensive worldwide commentaries for 131 tax jurisdictions.
- Comes with many more useful features for corporate taxes e.g. Tax Calendar, Ratefinder, Capital Gains, Thin Cap, Entity Manager, BEPS-Tracker.
- 9 GGI members are subscribing to COMTAX in 2018/19.
- License year from 1<sup>st</sup> June - 30<sup>th</sup> May.
- Termination possible with 3 month notice before end of license year.
- License fee: 2.400 € p.a. at the moment. The fee will decrease if more than 11 GGI members join and will increase if less than 11 members join)
- Free online webinars for users.
- Who is interested in free online demonstration?
- To get in touch: [sotirios.apostolou@comtaxit.com](mailto:sotirios.apostolou@comtaxit.com) or: [ian.wood@comtaxit.com](mailto:ian.wood@comtaxit.com)
- Find more information on: <http://www.comtaxit.com/>

## 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 licenses requested: 5 (**problem**)
- Total annual fee per block of 5 users is € 3,707 € ex VAT per year and per user

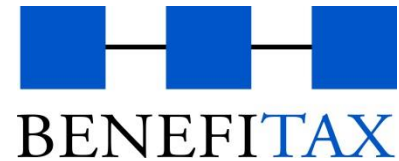
## B) Topical collection: Transfer Pricing

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

## General information:

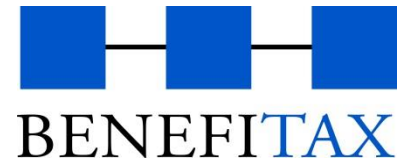
- Minimum duration of the subscription is 12 month with the same starting and end date for all participating members;
- License year: 1 March 28 February of the following year
- Please contact for more details, free online training or interest to license:  
Pavel Grishunin, Regional Account Manager IBFD,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

# Bureau van Dijk Amadeus Database (1)



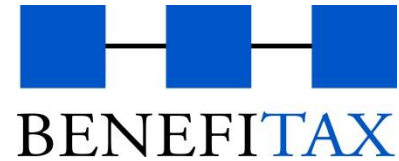
- BvD's product range includes databases of company information and business intelligence for individual countries, regions and the world.
- Their global database, Orbis, combines information from more than 140 sources and covers close to 230 million companies. BvD's TP Catalyst includes published financial data of 27 million companies and simplifies the execution of transfer pricing analysis and benchmark studies.
- New Catalyst Interface since March 2018: No more functions and risks evaluation included, but now its possible to save, export or print results at all steps.
- Other product „Document manager“ is suitable for large groups with 20+ subsidiaries“.
- More information on: <https://www.bvdinfo.com/en-gb/solutions-for-your-role/transfer-pricing>

## Bureau van Dijk Amadeus Database (2)



- Pricing for licenses in Germany (may be different in other countries):
- 1 TP benchmark study: 5,000 €
- 5 TP benchmark studies: 17,500 €
- 10 TP benchmark studies: 30,000 €. Unless you have an unlimited license the fee will not go under 3,000 € per study.
- License period: 12 months starting at any day
- Licensee: One branch of a company. Exceptions are possible for groups within one country (here: Germany)
- Pro's: good database, also used by Big4, tax departments of listed companies and tax authorities, rising need for TP documentation
- Con's: expensive, handling not easy if not done on a regular basis, detailed TP knowledge needed. They need one contract partner who pays upfront and this cannot be GGI HO. If we want to share a license one of us needs to act as contract partner we will know only afterwards who used it how many times.

# Upcoming ITPG Meetings



- 09 May 2019, European Regional Conference, Prague/Czech Republic (Oliver Biernat)
- 20 June 2019, PAN-American Regional Conference, Houston/TX/USA (Jeff Mowery and Sergio Guerrero)
- 24 Oct. 2019, World Conference, Marrakech/Morroco (Oliver Biernat)
- 28 Nov. 2019, Asia-Pacific Regional Conference, Bali/Indonesia (Ashishkumar Bairagra)

# ITPG awards (1)

In Marbella in Feb 2018, ITPG gave two awards to ITPG members who did an outstanding presentation at an ITPG meeting in 2017.

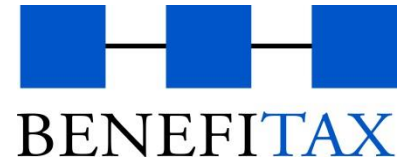
- a. best tax presentation: **Seres Baum**



- b. the most innovative speaker: **Dennis Nerland**.



## ITPG awards (2)



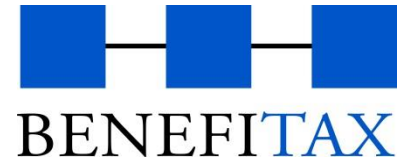
This year, ITPG nominated all speakers who arrived at an average (impact of the topic and how it was presented) number of credits above 4.0 (max. is 5.0)

a) Nominees for the Most innovative speaker 2019:

- Growth Strategies by merging with or acquiring other professional services firms (Marbella)
- Best Practices for Employee Retention (Buenos Aires)

And the winner is: .....

## ITPG awards (3)



### b) Nominees for the Best technical tax presentation 2019:

Robert Anthony: Can one today hide in an ever public digital world? Is being offshore a paradise or a future hell? (Berlin)

Fernando Lopez: USA - 2017 Tax Cuts and Jobs Act: Provisions Affecting International Business (Denver)

Alan Rajah: Brexit Update (Buenos Aires)

Oliver Biernat: Cross-Border Tax Case Study (Marbella)

Tony Nunes: Cryptocurrencies and Related Tax Issues (Marbella)

### Not nominated - because he and his firm left GGI

Robert Worthington: Reducing Canadian Corporate Tax on Investment Income (Denver)

And the winner with the highest average number of credits is: .....



## ITPG awards (4)

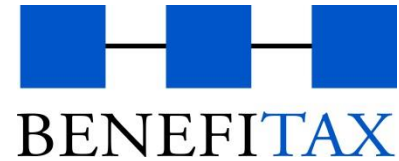
Congrats to the winners, who will receive:

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

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.

# 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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