

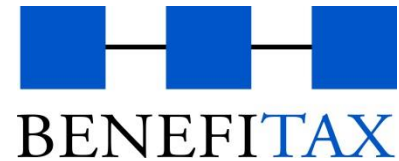
ITPG Meeting (International Taxation Practice Group)

Agenda ITPG meeting - 7 November 2019



- 14.30: Welcome
- 14.55 Video on differences between two American presidents (<https://youtu.be/OsBOWSjOLsE>)
- 15.18 Video proving that German electrical cars are the latest in technology
- 16.00 - 16.25: Coffee Break
- 17.07 Video on cultural differences
- 17.56 Video on an interview with a famous UK musician (<https://youtu.be/Nl0HqIbX7dc>)
- 18.00: Adjourn

Agenda ITPG meeting - 7 November 2019

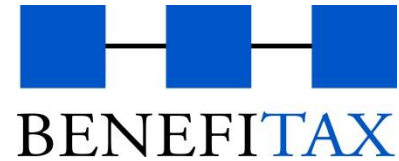


- 14.30 - 14.50: **Oliver Biernat**: Welcome and ITPG Internal Matters
- 14.50 - 14.55: **Alan Rajah, Oliver Biernat**: Next special edition of an FYI ITPG newsletter: 'Working Together to Optimise International Tax Compliance'
- 14.55: **Video on differences between two American presidents** (<https://youtu.be/OsBOWSjOLsE>)
- 15.00 - 15.18: **Réda Baghdadi**: Morocco Transfer Pricing Rules / Casablanca Finance City.
- 15.18 **Video proving that German electrical cars are the latest in technology**
- 15.20 - 16.00: **Oliver Biernat**: Panel Discussion on how to cope with the massive increase of requests for proposals from potential clients.
- 16.00 - 16.25: Coffee Break
- 16.25 - 17.07: **Robert Anthony**: CFC and Substance
- 17.07: **Video on cultural differences**
- 17.10 - 17.55: **Jeff Mowery**: Driving Explosive Growth through Alternative Service Offerings
- 17.55 - 18.00: Fill in the evaluation form in the conference app, thanks and Adjourn
- 17.56 **Video on an interview with a famous UK musician** (<https://youtu.be/Nl0HqIbX7dc>)

Internal ITPG Topics

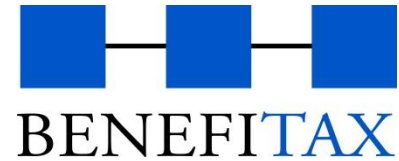
Oliver Biernat
ITPG Global Chairman

Agenda Internal Matters



- Presentation of first time attendees to an ITPG meeting
- 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
- Link via LinkedIn
- Disclaimer

Presentation of first time attendees to an ITPG meeting



Who of you has never been at an ITPG meeting before?

Please briefly introduce yourself with your

- name
- company
- country
- profession (e.g. lawyer, accountant, trustee)
- and your expectations from this meeting.

ITPG Chairs



Global Chairman
Oliver Biernat
(Germany)

Global Vice Chairman
Alan Rajah
(UK)

Global Vice Chairman
Ashishkumar Bairagra
(India)



Regional Chairman
Middle East Africa
Graeme Saggars
(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
Seres Baum
(Brazil)



Regional Vice Chairman
Europe
Bärbel Wierzoch
(Germany)



Regional Vice Chairman
Europe
Carlos Frühbeck-Olmedo
(Spain)



Regional Vice Chairman
Europe
Sergio Finulli
(Italy)



Regional Vice Chairman
Asia-Pacific
Ross Forrester
(Australia)



Regional Vice Chairman
Asia-Pacific
NN



Regional Vice Chairman
North America
Fernando Lopez
(USA)



Regional Vice Chairman
North America
Sébastien Lebrun
(Canada)



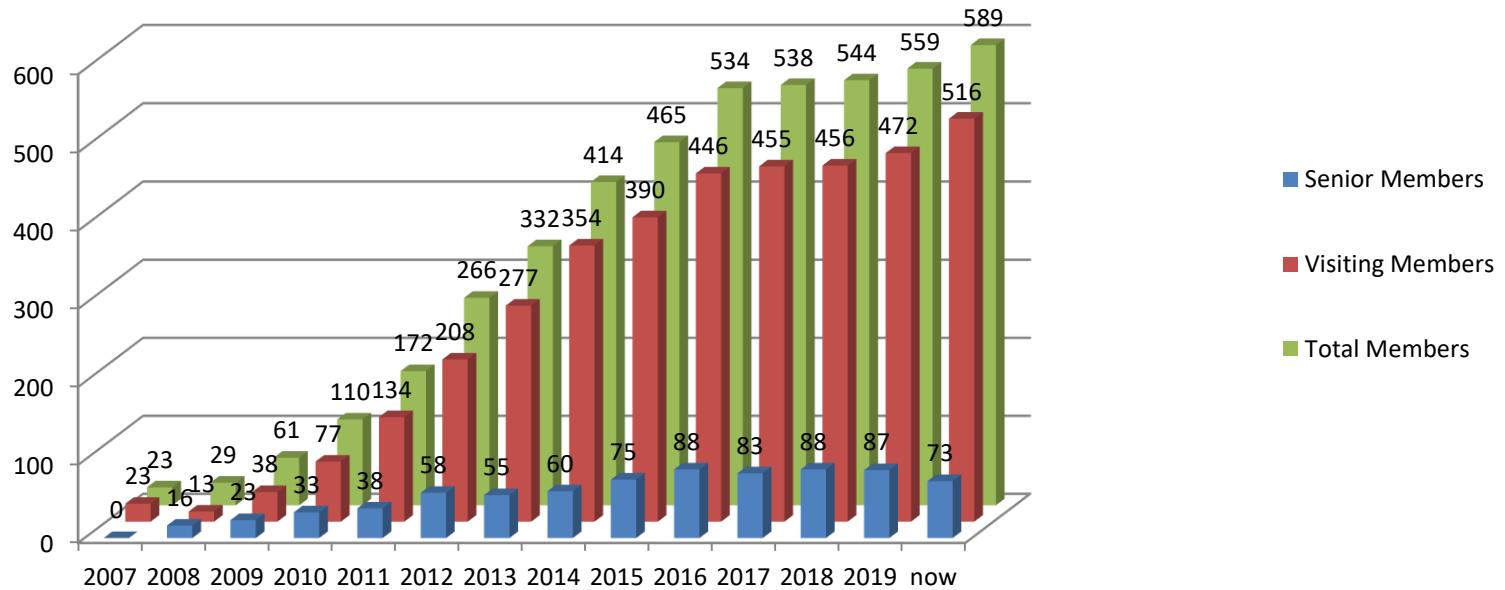
Regional Vice Chairman
Latin America
Angel Gabriel Viso
(Venezuela)



Regional Vice Chairman
Latin America
Sergio Guerrero
(Mexico)

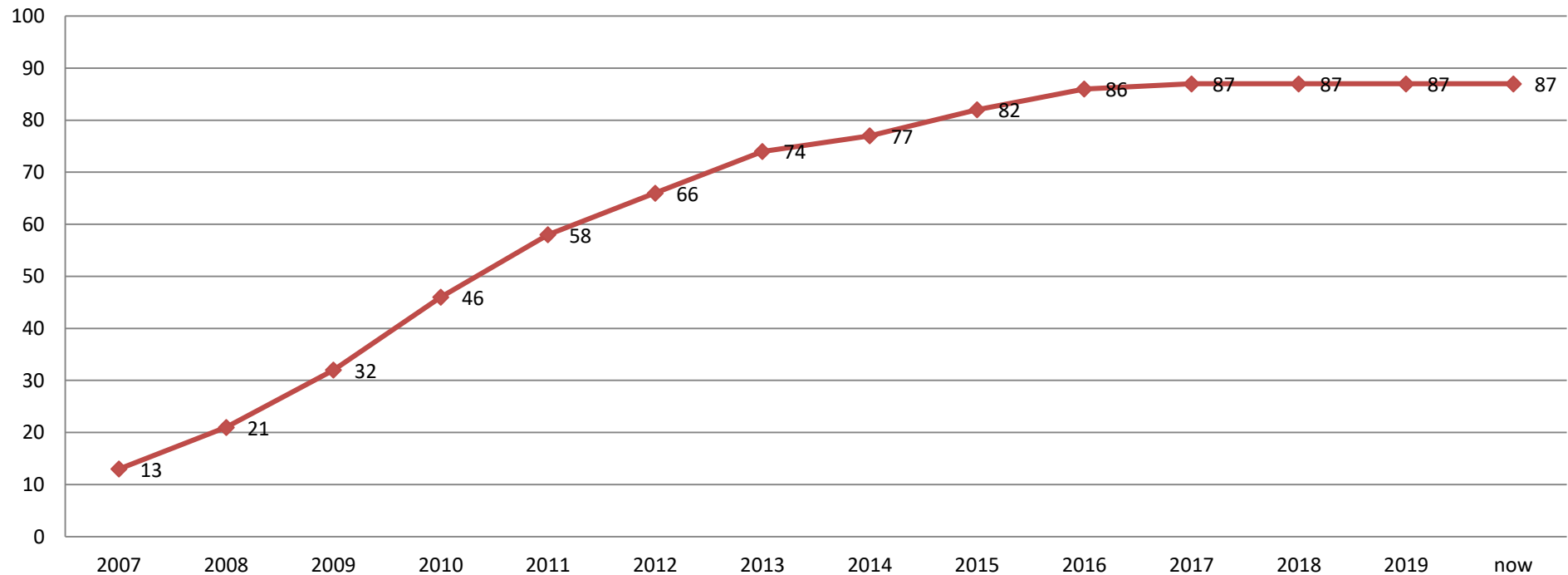
Regional Vice Chairman
Middle East Africa
NN

Statistics on the development of ITPG



Statistics on the development of ITPG

Number of countries covered by ITPG members



Asia / Pacific (Ashishkumar Bairagra / Ross Forrester)

- The next physical meeting will be during the Asia Pacific Regional Conference in Bali, Indonesia on 5th December 2019 (Thursday) at 15:00 hrs.
- The main agenda of this meeting will be a round table discussion on "Residency traps for small offshore ventures" led by Ross Forrester from Australia. Other topics include tax updates from other countries and discussions with members for increasing the participation of AP members within GGI.
- In case you are keen to present during any of the ITPG AP meetings, please contact Ashishkumar Bairagra.

Europe (Oliver Biernat)

- The Agenda for the ITPG Global Tax Summit 2020 in Frankfurt is complete.
- Registration is online on LinkedIn and via a link in the latest ITPG newsletter
- We are currently looking for suggestions for presentations at the European Conference in Cyprus in April 2020.
- Who offers which presentation?

Europe (Oliver Biernat)

- The Agenda for the ITPG Global Tax Summit 2020 in Frankfurt is complete.
- Registration is online on LinkedIn and via a link in the latest ITPG newsletter
- We are currently looking for suggestions for presentations at the European Conference in Cyprus in April 2020.
- Who offers which presentation?
- E.g. taxation of digital services, implementation of changes in the allocation of costs within a group as described in the OECD transfer pricing guidelines, acceptance of intermediate company for tax planning, how to find new experienced staff for accounting firms, etc.

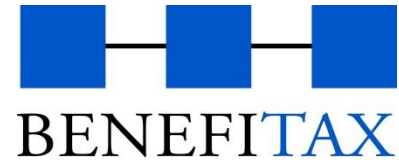
Latin America (Seres Baum)

- ACTIONS - Current discussion among Seres Baum vs Angel Viso vs Sergio Guerrero aiming to:
 - Map LATAM GGI members having taxation practices vs ITPG membership, expected to be finished in Dec/2019
 - Invite tax practicing members to enroll with ITPG and building an action plan to `appear` thru international writing articles in ITPG and local media – expected to March 2020
 - Build one-page summary (table) of existing DTA and investment treats among LATAM countries – Expected to June 2020
 - Find an efficient and effective way to prospect client based in the FDI among LATAM countries – After June 2020
 - Set up a `fixed` monthly WebEx/Skype agenda among us to succeed in the above topics
- UPCOMING EVENTS – GGI Iberic-American Conference in Spain (2020 tbc) and GGI ITPG Conference in Canada

MEA Region (Graeme Siggers)

- Welcome to the MEA region for the Global Conference. We hope everyone enjoys their time in Marrakech.
- Unfortunately Graeme Siggers (MEA Chairperson) could not attend this year.
- Réda Baghdadi from Morocco will be presenting on the following topic:
Morocco Transfer Pricing Rules / Casablanca Finance City.
- We look forward to seeing you at the Global Tax Summit in Frankfurt in February 2020 where Graeme Siggers will be presenting on the following topic:
Exchange of information: Does it work? A South African perspective

News from the regions



North America (Jeff Mowery)

- The ITPG meeting will be held at the North American Conference in Nassau, Bahamas on June 4, 2020.
- The agenda is being formulated, but likely topics include:
 - An update on 2017 U.S. tax reform as proposed regulations and IRS announcements have been released.
 - Impact of potential ratifications of USMCA Trade Agreement.
 - An interesting tax practice management topic.

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
- Spring 2020 edition is confirmed (max 15 contributions) and will arrive in April 2020 (in time for the GGI European Conference in Cyprus, starting 23 April 2020)
- Interested authors should send their topic suggestion no later than mid January 2020 to Aleksandra Jagiello (jagiello@ggi.com)
- Oliver Biernat is editor in chief and will decide on topics, authors etc.
- In 2020 we plan two editions (spring and autumn). Sponsoring firm?
- If nobody else is interested we ask Allen Kutchins from Kutchins, Robbins & Diamond, Ltd. in Chicago /USA again



FYI newsletter Sponsorship

Advantages for sponsors of an edition:

- The sponsor will be mentioned with company logo on the front page (in the online version with a link to their website)
- 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

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.

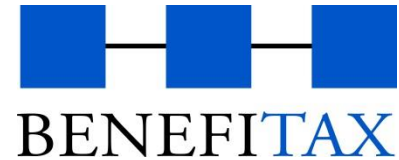
Future Sponsors:

- Who is interested (apart from Allen)?

FYI special newsletter

- 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)
- Oliver Biernat is editor in chief
- First edition on “Taxation of Cryptocurrencies” published in February 2019
- Second special edition will be on ‘Working Together to Optimise International Tax Compliance’, sponsored by Kevin Thorn.

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)
- 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 2020:**
 - January 2020: 07 January 2020
 - March 2020: 03 March 2020
 - May 2020: 05 May 2020
 - July 2020: 07 July 2020
 - September 2020: 01 September 2020
 - November 2020: 03 November 2020

- 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 2019/20.
- License year from 1st. June -30th May.
- Termination possible with 3 month notice before end of license year.
- License fee: **2.400 € p.a.** at the moment. The fee is decreasing if more than 11 GGI members join and increasing 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 or: 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
- Total annual fee per block of 5 users is € 3,707 € ex VAT per year and per user

B) Topical collection: Transfer Pricing

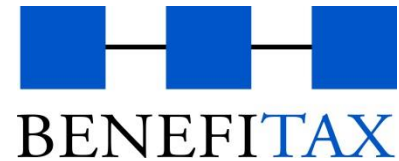
- Includes only Transfer Pricing data
- Minimum number of participants requested: 10 (not reached at the moment)
- Total annual fee per block of 10 users was € 409 per year and per user

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

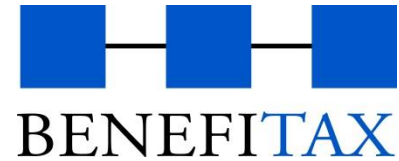
- BvD's product range includes databases of company information and business intelligence for individual countries, regions and the world.
- Their global database, Orbis, combines information from more than 140 sources and covers close to 230 million companies. BvD's TP Catalyst includes published financial data of 27 million companies and simplifies the execution of transfer pricing analyses and benchmark studies.
- More information on: <https://www.bvdinfo.com/en-gb/solutions-for-your-role/transfer-pricing>

Upcoming ITPG Meetings



- 05 December 2019, Asia-Pacific Regional Conference, Bali/Indonesia (Ashishkumar Bairagra)
- 27 February 2020 - 01 March 2020, ITPG Global Tax Summit, Frankfurt/Germany (Oliver Biernat)
- 23 April 2020, European Regional Conference, Limassol/Cyprus (Oliver Biernat)
- 04 June 2020, North American Regional Conference, Nassau, Bahamas/USA (Jeff Mowery)
- 25 June 2020, Latin American & Iberian Regional Conference, Madrid/Spain (Seres Baum)
- 22 October 2020, World Conference, Montréal QC./Canada (Oliver Biernat)
- TBC, Asia-Pacific Regional Conference, Venue tbc (Ashish Bairagra)

ITPG awards (1)



Winners of the ITPG awards for outstanding presentations at ITPG meetings

	2019	2018
Best Tax Presentation	Robert Anthony Fernando Lopez	Seres Baum
Most innovative speaker (non tax topics)	Jeff Mowery	Dennis Nerland

ITPG awards (4)

Award winners get:




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

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

Right to vote: All ITPG members who participated in the respective ITPG meetings. Please vote directly after the ITPG meeting is over.

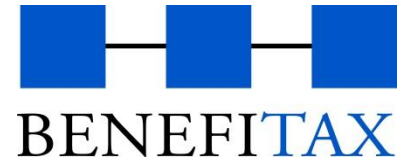
Link via LinkedIn

Please link via LinkedIn:

- Take out your smartphones
- Activate bluetooth in your general settings
- Open your LinkedIn App
- Click on the symbol  at the bottom
- Click on the symbol  at the bottom right
- Click on the symbol  : “Find nearby”
- After accepting bluetooth you can connect with other persons in this room

- Let's connect!

Disclaimer



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Thank you for your attention !



Oliver Biernat

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German Public Audit Company)

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