

Subject	To Do	In Charge	Due Date
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**Practice Group International Taxation: Minutes of the ITPG Meeting,
held in Marbella, on 11 February 2012, 9.15-18.00**

Chairman:	Oliver Biernat
Secretary:	Astrid Rechel

Participants				
Country	Company	Title	Name	First Name
Austria	Grazer Treuhand Steuerberatung GmbH & Partner KG	Dr.	Drawetz	Stefan
Austria	Heller Consult Tax & Business Solutions Prodinger Hoffmann & Partner Steuerberatung GmbH & Co KG		Heller	Elisabeth
Austria	Acco Accountants		Leitinger	Manfred
Belgium	Acco Accountants		Cornelis	Sven
Belgium	Acco Accountants		Deprey	Yannick
Cyprus	Eliades & Partners Avocates – Tax & Business Consultants		Christou	George
France	FIDAG		Moro	Viviane
Germany	Benefitax GmbH Steuerberatungsgesellschaft Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	Munkert & Partner GbR		Küspert	Klaus
Germany	Benefitax GmbH Steuerberatungsgesellschaft Wirtschaftsprüfungsgesellschaft		Rechel	Astrid
Germany	Benefitax GmbH Steuerberatungsgesellschaft Wirtschaftsprüfungsgesellschaft		Thieslauk	Martin
India	M.L. Bhuwania & Co. Chartered Accountants		Bairagra	Ashish
Italy	Comma 10 Commercialisti & Avvocati	Dr.	Angheldu	Andrea
Italy	Comma 10 Commercialisti & Avvocati		Cucchi	Simona
Italy	Dalla Libera & Partners	Dr.	Dalla Libera	Carlo
Italy	Comma 10 Commercialisti & Avvocati	Dr.	Finulli	Sergio
Italy	Balassone Casini Girardi (BCG) Associati	Dr.	Girardi	Ugo
	New Corporate Approach, S.C.		Sánchez Arrellano	Rodolfo
Mexico			Buziewski	Jacek
Poland	EFS Group Sp.z.o.o.		Plutowski	Artur
Poland	EFS Group Sp.z.o.o.		Tutu	Raluca
Romania	Mirus Advisors S.R.L.		Zeche	Ionut
Romania	Mirus Advisors S.R.L.		Augustin	Marian
Slovakia	AT Partners, k.s.		Frühbeck	Carlos
Spain	Ficesa Treuhand, S.A. Auditores y Asesores Fiscales		Lapausa	Santiago
Spain	Javier Carretero y Asociados - Abogados		Cocca	Claudio
Switzerland	Geneva Group International AG		Demir	Abdullah
Switzerland	Walser & Partners AG Freienbach		Wilhelm	Tobias
Switzerland	Walser & Partners AG Freienbach		Everaerd	Hugo
The Netherlands	De Keijzer Nipius & Co Accountants B.V.		Jarallah	Samir
United Arab Emirates	Al Zarooni Tureva Auditors Accountants Advisors		Bryant	Julie
United Kingdom	Haines Watts Chartered Accountants		Busch	Graham
United Kingdom	Lawrence Grant Chartered Accountants			

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United Kingdom	Haines Watts Chartered Accountants		McCrindale	Steve
United Kingdom	Lawrence Grant Chartered Accountants		Rajah	Alan
United Kingdom	Lawrence Grant Chartered Accountants		Shah	Sonal
United States	DRDA, PLLC		Dickey	Douglas
United States	Rowbotham & Company LLP		Hsieh	Cindy
United States	Ciuni & Panichi, Inc. CPA		Marita	Brian
United States	The Ruchelman Law Firm		Ruchelman	Stanley
United States	Eisner Lubin	Prof.	Simon	Robert
United States	Eisner Lubin		Springsteen	David

1.	<p>09:15 – 9.20 Welcome addresses The host of this meeting Santiago Lapausa and chairperson Oliver Biernat welcome the attendees. Oliver gives an overview on the timetable of the meeting with a focus on transfer pricing and proposals from two service providers which ITPG members could share.</p>			
2.	<p>9:20 - 10:15: Presentation by Pavel Grishunin - Regional Account Manager of IBFD He presents all IBFD services, the IBFD online portal, its content, functionalities and in details demonstrates a selection of databases on Transfer Pricing, (European) VAT and a number of publications on global issues (tax news, country surveys, country analyses, tax treaties, case law etc.).</p> <p>Pricing: In case there are at least 20 users from GGI IBFD offers, 1/5 rate of a standard license rate for GGI members, which then comes to</p> <ol style="list-style-type: none"> 1) online access to the Global Tax Explorer Plus collection is € 1,277 ex VAT for 1 single user or 2) The above plus the Transfer Pricing and VAT content modules is € 2,280 ex VAT for 1 single user or 3) IBFD Online Membership with the above plus access to 35 individual databases is € 2,957 ex VAT for 1 single user. <p>The presentation is followed by Q&A and Oliver asks who would be interested in licensing the database. IBFD will offer a more detailed online presentation of the programme to those members interested before taking a decision on purchasing and on which modules should be licensed.</p> <p><u>Interested members:</u> Cindy Hsieh Stanley Ruchelman Klaus Küspert Ashish Bairagra Yannick Deprey Manfred Leitinger Ionut Zeche</p>	<p>Please contact Oliver if you are interested in joining the users of IBFD services and have not said so in Marbella.</p>		

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	<p>Elisabeth Heller Artur Plutowski Sergio Finulli Alan Rajah Oliver Biernat</p> <p><u>Possibly interested members:</u> Santiago Lapausa Julie Bryant Hugo Everaerd George Christou Marian Augustin Abdullah Demir Bob Simon Carlo Dalla Libera Carlos Frühbeck</p>			
3.	<p>10:15 -10:45 Klaus Küspert: Presentation on “documentation duties and intercompany pricing, fierce enforcement or a lame duck? - He gives an introduction on the current German approach and comparison with other countries (UK, Italy, France, Spain, India) for which the information had been provided to him by ITPG members of these countries. In the following discussion members contribute experiences from other countries.</p>			
	10.50.-11.10 coffee break			
4.	<p>11:10-13:00: Dr. Shee Boon Law from the International Tax Academy of IBFD “Tax Planning and the Arm’s Length Principle” The presentation deals with the application of arm’s length principle in tax planning structures such as finance company and branch structures as well as some common business restructuring structures. The participants also discuss the relevant recent OECD developments in these areas.</p>			
	13.00 -14.00 lunch break			
5.	<p>14:15-15:10: Luis Carrillo from Bureau van Dijk (BvD), Amsterdam presents BvD’s transfer pricing databases, including a new platform, TP Catalyst pro, which is a web based tool and integrally contains Amadeus but also a lot of other data and search options. According to Luis, the cheaper version Osiris (already used by Stan Ruchelman in the US) is not suitable for European companies as it contains data from listed companies only.</p> <p><u>Special Price offer for GGI members:</u></p> <p><u>Main user</u> Access Fee (Amadeus via TP Catalyst Pro) €25,000 per year per concurrent user Usage Fee (up to 50 benchmarks) <u>€35,000</u> Total main user fee: €60,000</p>	If you are also interested in using BvD database please contact Artur Plutowski.		

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	<p><u>Beneficiary Offices</u> Beneficiary License Fee (European members)... €25,000 per year per country</p> <p>Basic usage conditions are as follow: Anybody wants to let participate and use the benchmarks, must</p> <ol style="list-style-type: none"> Be located in Europe Be a member of the GGI group Must have a beneficiary license* . Only if European GGI Group members pay that license to BvD, Main user may serve them benchmarks Users may not generate and distribute any master files <p>* A beneficiary license being a license to receive benchmarks generated by Main user and sell these to end users only (not to other consultants). The license does NOT include access to any database or to TP Catalyst Pro.</p> <p>Most participants were shocked by the relatively high price and some knew that other firms have lower price offers. Artur Plutowski, who has organised this contribution and was and is main contact partner for BvB, will re-negotiate with them.</p> <p><u>Interested members:</u> Carlos Frühbeck Artur Plutowski Iount Zeche Stanley Ruchelman (already using Osiris) Hugo Everaerd (?) Marian Augustin (?)</p>			
6.	<p>15:10-15:20: Oliver Biernat reports on “Tax changes when Germans hold/sell real estate properties in Spain”. Key information: If Germans intend to sell real estate property in Spain it is advisable to do so before ratification of the new DTT.</p>			
7.	<p>15:20 -15:35: Graham Busch “Recent developments in international tax matters”.</p> <p>15:35 -15:55 coffee break</p>			
8.	<p>15:55 – 16:10: Hugo Everaerd “R&D tax incentives in an international environment”</p>			
9.	<p>16:10 – 16:30: Samir Jarallah. Very funny presentation on “UAE tax regime, DTA and company structures”.</p>			
10.	<p>16:30 – 17:30: Cindy Hsieh: “Third wave of offshore voluntary disclosure program for taxpayers with non-U.S. accounts” and Claudio Cocca: “Swiss Banking Secrecy- The Beginning for the End.”</p> <p>The presentation is followed by a lively discussion.</p>			

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11.	<p>17:30: Claudio Cocca initiates the statutory election/re-election of the chairpersons. The present holders of the positions, Oliver Biernat as chairperson, Graham Busch and Ionut Zeche as vice-chairpersons, are willing to reassume the positions. The audience re-elects them with great majority. The candidates accept and receive the audience's congratulations. Special thanks are given to Oliver for his continuous effort and success in bringing this PG forward.</p>			
12.	<p>17:35-18:00: Internal Matters</p>			
	<p>a) News from the regions - Latin America and - Northern America: both regions invite for the joint Panamerican Conference in Miami in June 2012. An ITPG meeting will take place on 21 June 2012 in the afternoon.</p> <p>- Asia: Ashish Bairagra informs that the tax matrix on Regulatory and Tax Aspects of Expatriates, initiated in Kuala Lumpur in December 2011, is close to be finished for Asia. So far 14 members have submitted information from their countries.</p> <p>- VAT subgroup: Raluca Tutu informs that the subgroup held its first meeting on 10 February 2012. Chairperson is Raluca Tutu from Romania. Vice Chairperson is Steve McCrindle from UK (last information provided by Raluca Tutu after the meeting). If you are interested in working with the VAT subgroup please contact Raluca.</p>			
	<p>b) Oliver informs about the Chairpersons Meeting held the week before in Zurich/Switzerland: GGI headquarter has subscribed to Web-Ex as new internet based communication platform which shall replace Skype. It is in testing phase and will soon be at cost-free disposal of all Practice Group chairpersons and individual GGI members. A test meeting shall take place between various PG chairpersons on 16 February. More information to be followed.</p>			
	<p>c) The certificates of attendance in ITPG meetings in 2011 are given to all regular members. Details for 2011 about the topics which have been discussed and when can be found on GGI intranet for download on Practice Groups/International Taxation/Downloads.</p>			
	<p>d) Oliver informs that the discussion for an update of the ITPG International Tax and Business Guide has started. GGI HQ has offered help in the whole process. The topic shall be developed in further meetings. P.S. After the meeting it was suggested to go for an update to be published not before January 2013,</p>			

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	<p>provided that all GGI members have updated their country profiles by then, more GGI members have sent new country profiles, all authors order a minimum of 100 copies and GGI headquarter takes over the majority of the admin work involved. The format shall be a printed version again.</p>			
	<p>e) European Conference in Cannes: Oliver invites members to send him proposals for the agenda.</p>	<p>Members are invited to send ideas for the agenda.</p>	<p>All</p>	<p>a.s.a.p.</p>
	<p>f) World Conference in Rome: ITPG regular member Robert Anthony has suggested to moderate a discussion at the ITPG meeting in Rome in October about “Comparative Issues of International Taxation developments of trusts”. Representatives from about 10 countries could present and discuss the topic. Like before after the “substance over form” panel discussion in Munich it is planned that an article in the press will follow. The attendees agree to spend about 1.5 hours on the topic in Rome.</p>	<p>Members are invited to send other ideas for the agenda.</p>	<p>All</p>	<p>Before September</p>
	<p>g) Easy Meet in Austria in March: Oliver asks regular members if they would like to chair an ITPG workshop to young GGI at the Easy Meet.</p>	<p>Volunteers for chairing an ITPG workshop (regular members only) are asked to contact Oliver.</p>	<p>All</p>	<p>a.s.a.p.</p>
	<p>h) Venues and dates for 2012 and 2013 ITPG events <u>Next scheduled events are:</u></p> <ul style="list-style-type: none"> - Cannes – France 26 April 2012, 14.30 -18.00, before the European Conference - Eisenberg- Austria 9-11 March 2012, Workshop during Easy Meet? Who would like to chair it (present ITPG to Young GGI)? - Miami - 21 June 2012 14.30 -18.00, before Panamerican Regional Conference. - Rome - 18 October 2012, 14.30. -18.00, ITPG before World Conference - Prague - Czech Republic, 16.11.2012 (tbc), Workshop during Easy Meet chaired by Graham Busch - ITPG Meeting before Asian Conference in Bangkok in December. <p>Skype or Web Ex events will be added later.</p>			
	<p>k) Venue for next annual meeting: There are some divergent opinions: Have an easy accessible location with many direct flight connections or prefer locations in a good (sunny) climate? There are also various locations which do offer both, but are at a longer distance from Europe where still most ITPG</p>	<p>Send applications for next winter meeting at short term to Oliver; he will sent out a poll</p>	<p>All</p>	<p>A.s.a.p.</p>

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	<p>members come from.</p> <p><u>First Suggestions:</u> Mumbai Houston Dubai Istanbul Amsterdam Zürich (at GGI headquarter) Paris (?) San Francisco.</p> <p>Oliver will check details with the candidates and come back with a list of not more than 5 locations. Regular members will then be able to vote for these locations and the venue shall be presented in Cannes.</p>			
13.	<p>18:00: Closure: Oliver Biernat thanks the hosts, esp. Maria José, the speakers and participants and closes the meeting.</p>			