

Minutes of ITPG Skype conference held on: 7th of April, 2009, 2.00 – 3.00 p.m. (GMT)

Participants:

Alan Rajah

Carlos Frühbeck

Graham Bush

Niels Fischer

Oliver Biernat

Peter Ormandi

Santiago Lapausa

Sergio Finulli

Sergio Gurerro Rosas

Nick Brennan

1) Topics for discussion/presentations at the next ITPG meeting at May 14th in Lucerne just before the European conference. It was noted that the schedule is too wide, it is not sure if we have enough time to go through all the pegged topics. All named below for a topic are asked to contact the chairman if and how much time they would like for their presentation.

- Swiss topics e.g. bank secrecy in Switzerland, G20 decision on blacklist of tax heavens, agreements on exchange of information between tax authorities signed by many countries (Niels Fischer). The - G20 decision and consequences are welcomed from all of the participants- we should put more emphasize on this one
- Follow-up on Permanent Establishment rules in other countries (participants from countries that did not present their P.E. rules in Malta; please prepare!)
- Discussion of comtax software proposal and commitment from those who like to participate (Oliver Biernat)
- Economic employment case study (Attila Kovacs)
- Presentation from a professor from Vienna University on training for juniors in int. tax. (Ionut Zeche)
- European court decision on double inheritance/gift tax in two member countries on the same assets (Oliver Biernat)
- Probably update on “Doing Business in ...” for every member country” (probably Robert D’Alessandro and others (tbd))
- UK Holding Companies – No Tax At All (Graham Busch-entered into the agenda after the Skype conference due to recent important tax changes in the UK)

2) Presentation of an ITPG workshop to be held in Eisenberg, a case-study of about 2 hours is planned which is also suitable for participants with just basic knowledge in international taxation (Graham Bush) GGI HQ needs to be informed about the details!

3) Discussion if there shall be an additional physical one full day ITPG meeting in Frankfurt at September 5th 2009 (as indicated in Oliver’s email on March 9th. 2009). The following participants said that they would come: Carlos Frühbeck, Peter Ormandi or s.b. else from GGI HQ, Nick Brennan, Nils Fischer, Alan Rajah. Graham Busch and Sergio Finulli will not be able

to come at this day. It was decided to send out invitations and put an article in the GGI Insider. (Oliver Biernat)

- 4) Discussion on the updated proposal from Comtax for their international tax planning software. Many participants are ready to spend 1.000 Euros per year but not 2.788 Euros, which is the price asked for the full version. Graham Busch (1.000 Euros), Ionut Zeche (1.000 Euros), Nils Fischer (full version for 1.000 Euros!), Sergio Guerra Rosas (full version), Angel Viso (full version), Oliver Biernat (full version for less than 2.788 Euros) and Gernot Kos (who was interested long before this conference) said that they are interested. Nick Brennan, Carlos Frühbeck and Sergio Finulli will check with their partners and come back later with an answer. It was decided to
 - a) find more GGI members – also outside ITPG- in order to reach the minimum number of ten participants or even 20-25 participants in order to profit from further price reductions offered by Comtax for large scales. This shall be achieved asking all ITPG Members again (probably GGI HQ), a short presentation in front of all participants of the European Conference in Lucerne in May (by Oliver Biernat) and the Latin American conference in June 2009 (by Sergio Gurerro Rosas)
 - b) restart price discussions with Comtax and ask them for references and ongoing support. (Nils Fischer) The latest offers from Comtax are:
 - 1.000 Euros per year for the Basic version (e.g. one restriction is that taxation for transfers from one country to another can be checked but no simultaneous tax planning via various countries) for) or
 - 2.788 Euros per year for the full version.
 - 1.000 Euros for a three months test period for the full version and another 1.788 Euros for the following nine months if contract shall carry on
- 5) The development of the holding company matrix (Graham Busch). It was agreed that Graham would circulate all of the ITPG members and visitors with the outline matrix and ask them to complete this for their country and return it to Graham prior to Lucerne, where it would be presented to the ITPG meeting and if possible to the whole conference (and e-mailed to all members thereafter). It was hoped that members outside of the ITPG address group would be able to add their country details thereafter.