



GENEVA GROUP INTERNATIONAL

**Practice Group International Taxation: Minutes of the ITPG Meeting,  
held in Lisbon, 18 April 2013, 14:30 – 18:00**

<b>Chairman:</b>	Oliver Biernat
<b>Secretary:</b>	Astrid Rechel-Götz

**Participants**

<b>Country</b>	<b>Company</b>	<b>Title</b>	<b>Name</b>	<b>First Name</b>
Austria	Grazer Treuhand Steuerberatung GmbH & Partner KG	Dr.	Drawetz	Stefan
Brazil	Grupo Work Independent Auditors		Baum	Seres
Canada	Shea Nerland Calnan LLP		Nerland	Dennis
China	Horizon Group		Mak	Gilbert
France	Anthony & Cie	Prof.	Anthony	Robert
France	FIDAG		Moro	Viviane
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Biernat	Oliver
Germany	WRT Revision und Treuhand GmbH	Dr.	Clemens	Olaf
Germany	Jakoby Dr. Baumhof - Wirtschaftsprüfer Steuerberater Rechtsanwälte		Jakoby	Brigitte
Germany	Jakoby Dr. Baumhof - Wirtschaftsprüfer Steuerberater Rechtsanwälte		Jakoby	Eugen
Germany	Jakoby Dr. Baumhof - Wirtschaftsprüfer Steuerberater Rechtsanwälte		Köhnlein	Katrin
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft		Rechel-Götz	Astrid
Germany	FACT GmbH Wirtschaftsprüfungsgesellschaft		Gottmann	Andreas
Germany	FACT GmbH Wirtschaftsprüfungsgesellschaft		Schwechel	Bernhard
Germany	Gehrke econ Steuerberatungsgesellschaft		Gehrke	Ulrich
Germany	WRT Revision und Treuhand GmbH		Schüssler	Björn
Ireland	Byrne & McCall Accountants & Tax Advisors		McCall	Joe
Isle of Man	Greystone LLC		Wiltcher	Guy
Italy	Dalla Libera & Partners	Dr.	Dalla Libera	Carlo
Italy	COMMA 10 – Commercialisti & Avvocati	Dr.	Finulli	Sergio
Italy	Refidata srl		Giannini	Patricia
Italy	Refidata srl	Dr.	Girardi	Ugo
Italy	Studio Bolla Quaglia & Ass.	Dr.	Bolla	Riccardo
Italy	Studio Bolla Quaglia & Ass.	Dr.	Quaglia	Stefano
Portugal	Pontes, Baptista & Associados. Sociedade de Revisores Oficiais de Contas, Lda	Dr.	García	Paula
Romania	Mirus Advisers S.R.L.		Tutu	Raluca

<b>Country</b>	<b>Company</b>	<b>Title</b>	<b>Name</b>	<b>First Name</b>
Romania	Mirus Advisers S.R.L.		Zeche	Ionut
Slovakia	AT Partners, k.s.		Augustin	Marian
Spain	Ficesa Treuhand, S.A. Auditores y Asesores Fiscales		Frühbeck	Carlos
Sweden	Comtax		Becker	Henri
Sweden	Comtax		Persson	Bernt
Sweden	Stromson Revisionbyra KB		Dellström	Frederik
Sweden	Stromson Revisionbyra KB		Henriksson	Claudio
Switzerland	Walser & Partner AG Freienbach		Demir	Abdullah
Switzerland	Walser & Partner AG Freienbach		Wilhelm	Tobias
The Netherlands	Limes International BV		Domburg	Nick
The Netherlands	Limes International BV		Seinstra	Age
The Netherlands	Contour Accountants		Geurts	Joris
The Netherlands	Contour Accountants		Joosten	Ton
The Netherlands	LIMES International B.V.		Van Harten	Martin
United Kingdom	Haines Watts		Bryant	Julie
United Kingdom	Lawrence Grant, Chartered Accountants		Busch	Graham
United Kingdom	Citroen Wells Chartered Accountants		Charles	Henry
United Kingdom	Lawrence Grant, Chartered Accountants		Harunani	Kassim
United Kingdom	Lawrence Grant, Chartered Accountants		Rajah	Alan
United States	Cantor & Webb P.A.		Cantor	Steven
United States	Prager & Fenton LLP		Gosch	John
United States	The Ruchelman Law Firm		Prisk	Simon

	Subject	To Do	In Charge	Due Date
1.	<p><b>Oliver Biernat</b> opens the session at 14:45 hours. He welcomes the participants and the sponsor Mr. Bernt Persson, MD of Comtax and the main speaker Mr. Henri Becker. Oliver gives an overview on the agenda.</p> <p>He reminds the attendees not to leave the room before having filled in the new evaluation questionnaire provided from GGI because only those that have filled in the questionnaire properly have been officially present, which is important for a number of things, e.g. receiving an attendance certificate.</p>			
2.	<p><b>Steven Cantor:</b> The Latest FATCA Regulations - The Plot Thickens! (15 min) Steven's short presentation is followed by a Q&amp;A round. The presentation will be stored on the GGI intranet.</p>			
3.	<p><b>Graham Busch:</b> Latest tax developments in the UK of interest to foreign investors or workers (15 min) Graham invites to come back to him for further questions during the conference. Besides his presentation will be stored on the GGI intranet.</p>			
4.	<p><b>Carlos Frühbeck:</b> Recent changes in Spanish taxation with respect to foreign investments in Spain (15 min)</p>			
5.	<p><b>Internal (Biernat): Update of ITPG Tax and Business Guide:</b> The task force has been eagerly working on various topics. This is the status:</p> <p>a) So far 3 <b>sponsors</b> have been found who pay a <u>total of 9.500 Euros</u>. More are very welcome. There has been a conflict re. sponsors as the majority of the participants in the ITPG meeting in Amsterdam voted against Swiss banks as sponsors but GGI HQ insisted to allow their two main sponsors Corner Bank and Bank Alpinium as sponsors. The task force decided that these two Swiss banks will be allowed if there will be at least two more sponsors that are non banks. So far only one more sponsor (Samsung) has been found.</p> <p>Oliver informs that a new incentive for PGs from GGI HQ will be fully used for this project in 2013, so that another 2,500 Swiss Franks can be added to the sponsoring. Therefore Oliver believes that the cost per copy come to less than 5 €.</p> <p>Contact person for sponsoring at GGI HQ is Natalia Bednarczyk (<a href="mailto:bednarczyk@ggi.com">bednarczyk@ggi.com</a>) who informs that the sponsors have the chance to put advertisements in the guide. 2,500 EUROS per page, 1,500 EUROS per half a page. She invites all participants to forward to her information about possible sponsors.</p> <p>b) Annina Bannwart from GGI HQ informs about the procedure of becoming an author: Following a ranking list authors of the previous edition that are still GGI members have been asked first, now all regular members have been asked to contribute for countries not covered yet. In a next step all visiting members will be asked and if a last step all GGI members will be asked to contribute. Conditions are mainly the confirmation to deliver the article in time and to order at least 100 copies of the book in order to make sure that costs per</p>	<p>a) Recommend sponsors to Natalia</p> <p>b) Contact Annina for being an author</p> <p>c) Order copies with Annina</p>	all	

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	<p>copy come down and ensure wide distribution of the book in many countries.</p> <p>c) Annina further informs that 4,200 copies have been ordered so far. She distributes some more agreement forms and is available for signature of order forms. Oliver reminds that the project will only start if at least 5,000 copies have been ordered.</p>																	
6.	<p><b>Internal (Biernat): IBFD tax database.</b> Oliver announces that the minimum number of 5 members has been met. So far the following 7 GGI members have signed up, which can be considered as a little success.</p> <table border="1"> <tr> <td>Canada</td> <td>Shea Nerland Calnan LLP</td> </tr> <tr> <td>Germany</td> <td>Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft</td> </tr> <tr> <td>Poland</td> <td>EFS Group Sp. z o.o.</td> </tr> <tr> <td>The Netherlands</td> <td>Limes International BV</td> </tr> <tr> <td>United Kingdom</td> <td>Haines Watts</td> </tr> <tr> <td>United States</td> <td>Cantor &amp; Webb P.A.</td> </tr> <tr> <td>United States</td> <td>The Ruchelman Law Firm</td> </tr> </table>	Canada	Shea Nerland Calnan LLP	Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft	Poland	EFS Group Sp. z o.o.	The Netherlands	Limes International BV	United Kingdom	Haines Watts	United States	Cantor & Webb P.A.	United States	The Ruchelman Law Firm			
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7.	<p><b>Internal (Biernat):</b></p> <p><b>Changes for confirmations for making presentations in ITPG Meetings:</b> Due to negative experience in the past the following sentences in red was added in the ITPG Q&amp;A in GGI intranet:</p> <p style="background-color: #e0e0e0; padding: 5px;">I would like to make a presentation on a tax topic in one of the meetings. What shall I do?</p> <p>Please contact the person chairing the meeting (e.g. Global Chairperson, Regional Chairpersons) and provide him/her with a short description of your topic. Cross-border topics have priority to national tax topics. Regular Members have priority to Visiting Members. <b>Confirmation for making a presentation is given under the condition that you sign up for the respective conference or meeting within 4 weeks after registration has started. Presentations of those not registered will be cancelled.</b></p>		all															
8.	<p><b>Internal (Biernat):</b></p> <p>Ashish Bairagra our ITPG Chairman Asia/Australia had asked Oliver to make the following announcement:</p> <p>Project on Regulatory and Tax Aspects for Royalty and FTS payments has been launched and all ITPG members are invited to contribute. Also if any of the European members would like to contribute to the first project on Regulatory and tax Aspects for Expatriates, the Asian ITPG chairs will be more than happy to include them.</p>	Contact Ashish, Ricky or Dov if you wish to be part of the Asian projects																

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9.	<p><b>Internal (Biernat):</b></p> <p><b>Comtax:</b></p> <p>At the moment 14 licenses are licensed by GGI members.</p> <table border="1"> <tr> <td>Belgium</td> <td>Acco Accountants</td> </tr> <tr> <td>Germany</td> <td>Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft</td> </tr> <tr> <td>Germany</td> <td>Munkert &amp; Partner GbR</td> </tr> <tr> <td>Germany</td> <td>WRT Revision und Treuhand GmbH</td> </tr> <tr> <td>Italy</td> <td>Dalla Libera &amp; Partners</td> </tr> <tr> <td>Luxembourg</td> <td>GT Fiduciaires SA</td> </tr> <tr> <td>Mexico</td> <td>Guerrero y Santana, S.C.</td> </tr> <tr> <td>Poland</td> <td>EFS Group Sp. z o.o.</td> </tr> <tr> <td>Romania</td> <td>Mirus Advisers S.R.L.</td> </tr> <tr> <td>Spain</td> <td>Ficesa Treuhand, S.A. Auditores y Asesores Fiscales</td> </tr> <tr> <td>United Kingdom</td> <td>Haines Watts</td> </tr> <tr> <td>United Kingdom</td> <td>Haines Watts</td> </tr> <tr> <td>United Kingdom</td> <td>Lawrence Grant, Chartered Accountants</td> </tr> <tr> <td>Venezuela</td> <td>Viso, Rodríguez, Cottin, Medina, Ramírez &amp; Asociados</td> </tr> </table> <p>Others can be added if your firm is a GGI member. The price list will be provided on request to GGI members (not to potential members or guests).</p> <p><b>Comtax new feature:</b> The Database section Transfer pricing is now amended to include references to local laws and rules, please see heading "Laws and rules" under Transfer pricing.</p> <p>Also there is a <b>new product called Comtax TP platform</b>, which is available for a separate license fee. Comtax offers free online tutorials during the next weeks or on request for GGI members.</p>	Belgium	Acco Accountants	Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft	Germany	Munkert & Partner GbR	Germany	WRT Revision und Treuhand GmbH	Italy	Dalla Libera & Partners	Luxembourg	GT Fiduciaires SA	Mexico	Guerrero y Santana, S.C.	Poland	EFS Group Sp. z o.o.	Romania	Mirus Advisers S.R.L.	Spain	Ficesa Treuhand, S.A. Auditores y Asesores Fiscales	United Kingdom	Haines Watts	United Kingdom	Haines Watts	United Kingdom	Lawrence Grant, Chartered Accountants	Venezuela	Viso, Rodríguez, Cottin, Medina, Ramírez & Asociados	<p>Contact Bernt Persson (<a href="mailto:bernt.persson@comtaxit.com">bernt.persson@comtaxit.com</a>) if you are interested to license the tax planning software or the TP platform.</p>		
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10.	<p><b>Internal (Biernat): The FYI international Tax newsletter</b> (decided in Amsterdam) is on hold since GGI HQ needs to check in more detail beforehand if this is not a conflict with the EU network definition for GGI</p>																															
11.	<p><b>Internal (Biernat): Polo shirt:</b> Project is cancelled. GGI HQ did not approve of funny slogans provided by the members and did not offer help in the logistics to distribute the shirts.</p>																															
12.	<p><b>Internal (Biernat): New feature in future ITPG meetings:</b> Discussion on recent tax topic (to be decided on one week before meeting) in order to discuss very recent developments</p>																															
13.	<p><b>Internal (Biernat):</b> Oliver informs that first discussions started with PG Governmental Affairs &amp; Public Procurements (Dr. Laszlo Tunyogi) to start a new project within GGI that provides professional up to date information and assistance for GGI members to perform</p>	<p>Contact Oliver or Laszlo if you want</p>	all	asap																												

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	consulting on how to apply for EU grants and subsidies. If of interest a joint task force shall be created.	to join that task force.		
14.	Speed networking planned to be presented by Graham Bush is skipped due to shortness of time			
	<b>Coffee Break (20 min)</b>			
15.	<b>Henri Becker</b> (Partner at Alder&Sound, Attorneys, Helsinki, Finland), Design, implementation and maintenance of a tax efficient business model for a multinational enterprise. Henri's presentation is followed by a lively discussion about the necessity of preparing transfer-price-documentation for smaller companies in different countries.			
16.	<b>Bernt Persson</b> , Managing Director of Comtax AB, Sweden: Special offer for GGI members for tax planning software. Joining company agreement is possible for all ITPG members at special conditions on site in Lisbon or any time via contact with Bernt Persson.			
17.	<b>Internal (Biernat):</b> Next ITPG Meetings: <ul style="list-style-type: none"> <li>- 09.05.2013: San Francisco ITPG (14:30-18:00)</li> <li>- 10.05.2013: San Francisco: Sub-group VAT</li> <li>- 20.06.2013: Eisenberg ITPG (16.00 -17.30)</li> <li>- 31.10.2013: Cancun: ITPG (14:30 – 18:00): Main topics “BRICS and International Taxation”, Discussion with representatives from BRICS countries moderated by Peter Wilson (Haines Watts)</li> <li>- 01.11.2013: Cancun: Sub-group VAT</li> <li>- 07.12.2013: Mumbai: ITPG (tbc)</li> <li>- 07.03.2014: Milan: ITPG winter meeting (with big carnival party, ski-outing to Engadina and big surprise).</li> <li>- For Webex meetings please check GGI Intranet.</li> </ul>	Please send proposals for topics in Cancun, Mumbai or Milan to Oliver.	all	
18.	<b>Oliver Biernat:</b> Oliver closes the meeting at 18:00.			