



**GGI ITPG Winter Meeting  
Marbella**

**Friday, February 20<sup>th</sup> 2015**

**Case Study on international holding and trade companies**

**Team leaders:**

Team "Blue": **Marian Augustin** / AT Partners, k.s. (Slovakia)

Team "Purple": **Julie Bryant** / Haines Watts (UK)

Team "Pink": **Carlos Frühbeck Olmedo** / Ficesa Treuhand (Spain)

Team "Orange": **Kapel Huub** / Limes International BV (The Netherlands)

Team "Black": **Stanley C. Ruchelman** / Ruchelman PLLC (USA)

Team "Green": **Wilhelm Tobias** / Walser & Partner AG Freienbach (Switzerland)

**Jury:**

**Robert Anthony** / Anthony & Cie (France)

**Oliver Biernat** / Benefitax GmbH (Germany)

**Claudio Cocca** / GGI (Switzerland)

**Case description:**

- A French national has invented a new medical device.
  - They have found funding from a USA venture capital company. It is their intention to eventually float the company.
  - They wish to protect the intellectual property rights. License the manufacturing and distribute and sell the product globally.
  - This raises several questions:
    - Where their holding company should be based?
    - Where should they license their product to minimize withholding taxes on royalties globally?
    - Where should they carry out their sales contracts?
    - What sales tax issues are there?
- **They need advice from various experts on "Which country would be best to install a holding company?"**

**The challenge:**

Prepare and finally deliver a **10 min presentation to explain what are the best country(ies)** as a holding location and how they would deal with the above issues.