

Agenda Saturday ITPG Meeting 2015 in Marbella



9.30 Ashish Bairagra: Taxation of Indirect Transfers.

10.00 Klaus Küspert: Case Study on Base erosion/profit shifting

11.30 coffee break

12.00 Oliver Biernat: Internal ITPG Topics

Update on development of ITPG, ITPG projects (old and new), Comtax, IBFD, ITPG, future events.

12.30 Robert Worthington: Cross-border Financing Using Hybrid Instruments

12.50 Huub Kapel

Art 15 OECD / Split salary

13.10 Matteo Bedogna: Transfer Pricing Litigation - Case History with Italian Tax Authority

13.30 Lunch

14.30 Arlene Rochlin: “COMPLIANCE is elementary, my dear Mr. Watson” or The elements of COMPLIANCE-for both accountants and lawyers.

15.30 Coffee Break

16.00 Santiago Lapausa:

Spanish Golden Visa and a few notes about the Spanish tax reform.

16.20 Stanley C. Ruchelman

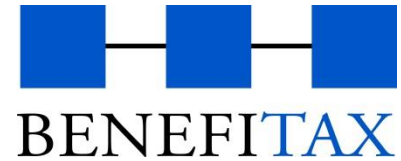
Treaty Abuse under B.E.P.S. – L.O.B.? G.A.A.R.? Both? **(20 min)**

16.40 Marc Nideröst

Update on planned major corporation tax reform in Switzerland

Approx. 17.00: Adjourn

Disclaimer



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Internal ITPG Topics

Oliver Biernat
ITPG Global Chairman

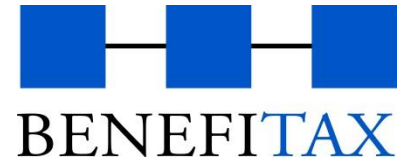
Agenda

- Overview on chairs and regions
- Statistics on the development of ITPG
- News from the regions
- News from the PG chairpersons meeting
- ITPG FYI client info newsletter 2015
- IFA Annual Meeting in Basel 2015
- IBFD and Comtax licenses
- Idea: Booklet: 50 grey zones?
- Certificates 2014
- Presentation of upcoming ITPG events
- Disclaimer

ITPG Chairs

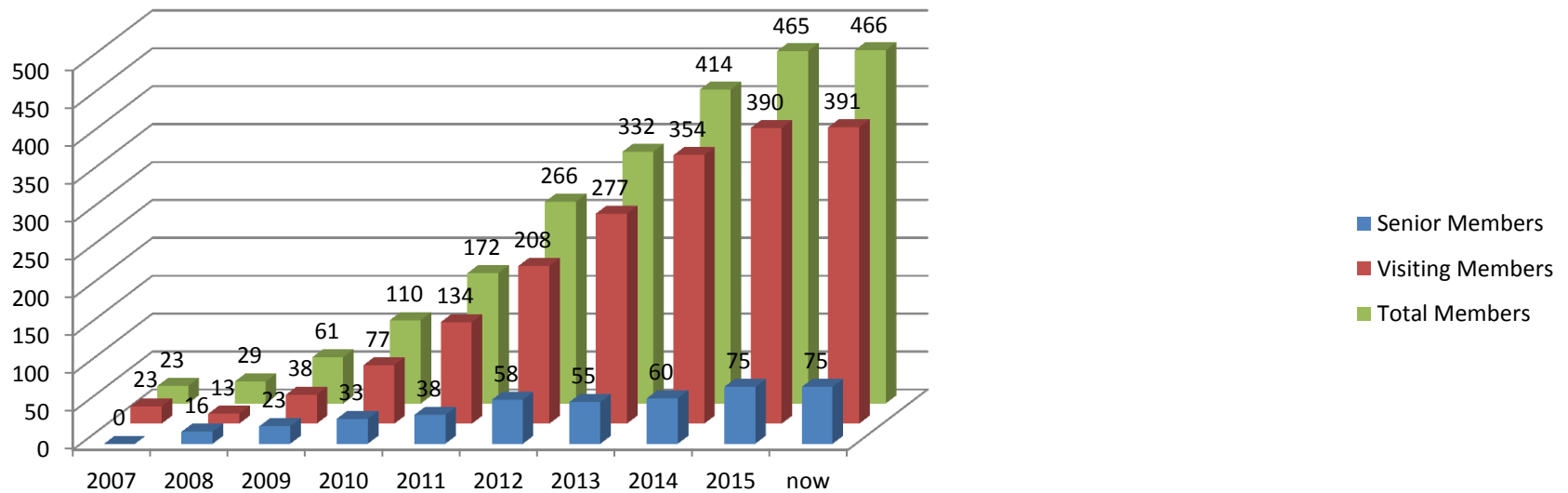


Statistics on the development of ITPG



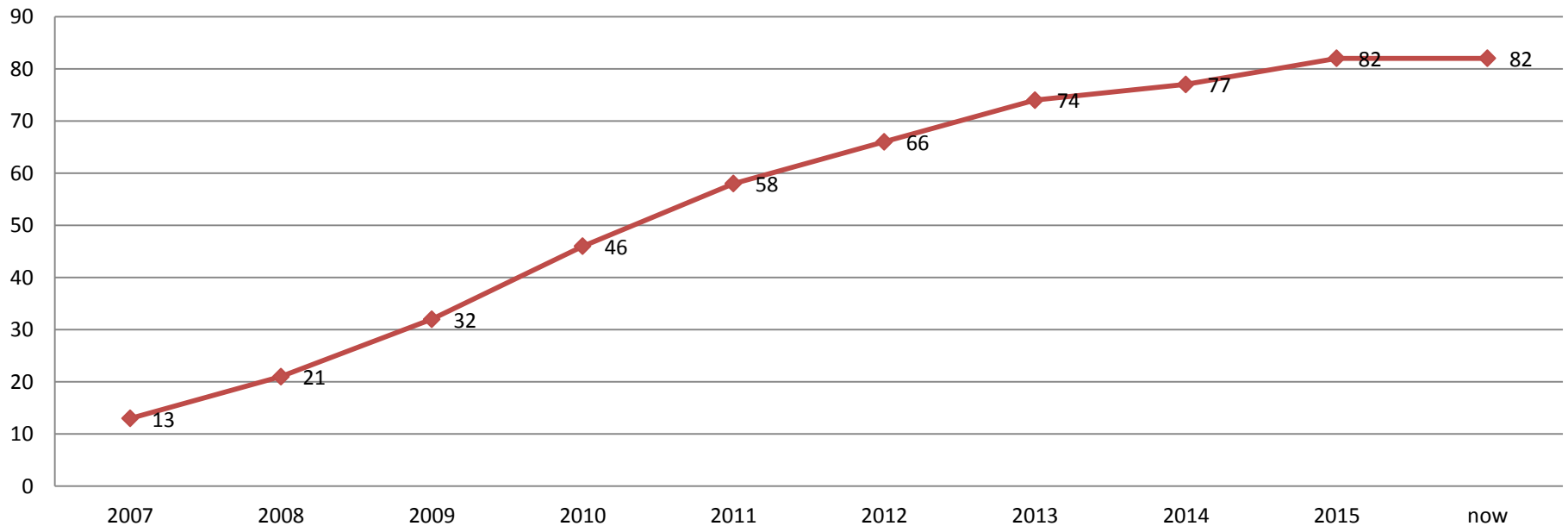
- 1 Member left because his company was dissolved
- 7 Members left because they left a GGI firm
- 16 Members and 2 senior members left because their firm left GGI
- 6 Members firms never became a GGI member (candidates)
- 2 Members were downgraded from senior to normal member
- 13 Members were upgraded from normal to senior member
- We are currently looking for regional vice chairs for
 - MEA region, esp. Middle East and North Africa
 - Asia Pacific, esp. Pacific
 - Regional chairs and vice chairs: Indirect Taxes subgroup for AP, NA and MEA

Statistics on the development of ITPG



Statistics on the development of ITPG

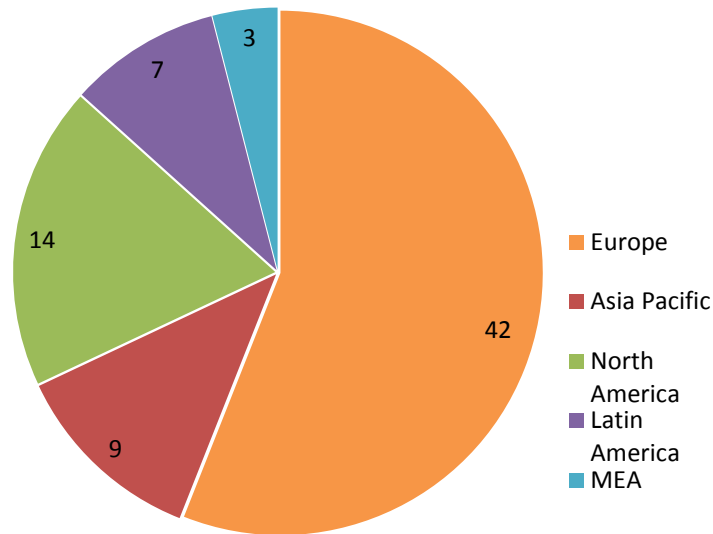
Number of countries covered by ITPG members



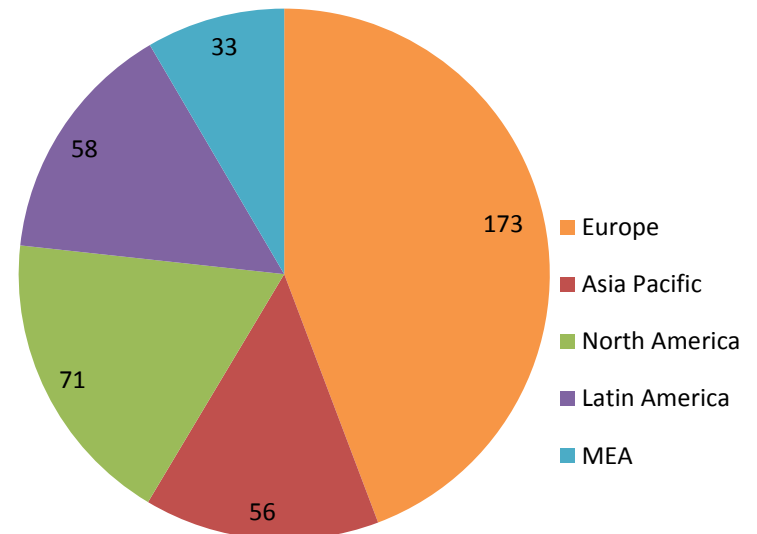
Statistics on the development of ITPG

Which region do our members come from at the moment?

Senior Members

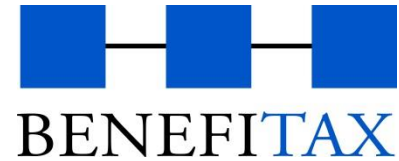


Members



- **Asia/Pacific** (Ashish Bairagra): Update Questionnaire for Tax and Regulatory Aspects for Expatriates in AP region, new Project for developing a Questionnaire for Tax and Regulatory Aspects for Royalty and Fees for Technical Services
- **Latin America** (not represented by chair in Marbella). WebEx conferences planned for March & June/July, ITPG meeting at regional conference in Costa Rica in April
- **Northern America** (Doug Dickey): ITPG Meeting in May in Las Vegas, New Transfer Pricing Webcast by Kurt Wulfekuhler, CPE credits helpful for ITPG (WebEx) events
- **MEA region** (Graeme Saggars): MEA conference in Feb. 2016
- **VAT Subgroup** (Raluca Tutu):
Products: quarterly newsletter, VAT matrix updated frequently, Reverse charge mechanism matrix per each country – updated frequently.
Projects: VAT International booklet per country profile, Procedures for pitching on multi-jurisdictional mandates and alignment of fees.

News from the PG Chairpersons meeting



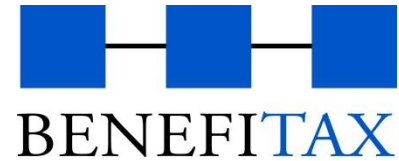
Held in Zurich on Saturday 7th. February 2014:

- New PG Chairs:
 - Labor Law: Jeffrey Kenens
 - Audit PG: NN replacing Thomas Geiger as of April 2015
 - Real Estate: Paul Simmons replacing Reinhard Nacke
- M&A PG has own LinkedIn group? Does it make sense for ITPG?
- Sponsors who are ready to spend 2,500 € for a 15 min presentation at an ITPG meeting ? M&A did that.
- PG meetings will not be charged extra in future GGI meetings (Test in Bangkok)
- How to achieve that members no longer register for a PG meeting, but then do not show up? GGI now allows to register for a GGI conference without registering for a PG Meeting (voluntary).

News from the PG Chairpersons meeting

- Results from evaluation sheets on PG meetings (not only ITPG):
 - Presenter was hardly understandable (bad English)
 - Presenter just marketed his own firm
 - Presenter was not well prepared
 - Too many slides/took much longer than scheduled
 - Letters on slides were too small (40 lines per slide)

ITPG FYI client newsletter



In 2014 ITPG started the ITPG FYI client newsletter with 2 editions per year.

If you are interested to publish an article in 2015 please contact: b.reiss@ggi.com

Priority for authors:

- a) ITPG chairs
- b) Those who recently made a presentation
- c) senior ITPG members
- d) normal ITPG members

IFA Annual Meeting 2015

- The IFA (International Fiscal Association) holds its Annual Meeting 2015 in
- Basel/Switzerland
- From 30 August 2015 - 4 September 2015
- Detailed information/registration: www.ifabasel2015.com

Main topics:

- Tax incentives on Research and Development (R&D)
- The practical protection of taxpayer's fundamental rights

Other topics:

- Cross-border supply of services and VAT/GST: Development of IFA-proposals
- The taxation of expatriates
- The taxation of global families
- Effectiveness of the participation exemption
- Cross-border mergers of companies
- Recent developments in international taxation
- Timing issues in the application of tax treaties

Who plans to participate?

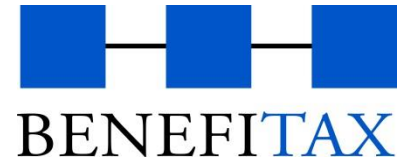
Comtax Tax Planning software



- It is a tax calculation tool for 129 countries. **11** GGI members have subscribed for a Comtax license. License year from 1st. June -30th May . Termination possible with a 3 month notice. Who else is interested? Free online demonstrations available. More information on: <http://www.comtaxit.com/>

Belgium	Acco Accountants
Canada	Shea Nerland Calnan LLP
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft
Germany	Munkert & Partner GbR
Germany	WRT Revision und Treuhand GmbH
Italy	Dalla Libera & Partners
Luxembourg	GT Fiduciaires SA
Romania	Mirus Advisers S.R.L.
Spain	Ficesa Treuhand, S.A. Auditores y Asesores Fiscales
The Netherlands	Limes International BV
United Kingdom	Lawrence Grant, Chartered Accountants

IBFD full membership



General conditions:

- Minimum duration of the subscription is 12 month with the same starting and end date for all participating members; License year: 1 March 2015- 28 Feb. 2016.
- Minimum number of participants requested: 5 (reached)
- Total annual fee per block of 5 users is € 3,262 € per year and user including all IBFD databases.

IBFD full membership



5 GGI firms have joined so far (minimum) . Who else wants to join?

Canada	Shea Nerland Calnan LLP	Nerland	Dennis
Czech Republic	Grinex Czech Republic	Jahoda	Richard
Poland	EFS Group Sp. z o.o.	Plutowski	Artur
The Netherlands	Limes International BV	Domburg	Nick
United States	The Ruchelman Law Firm	Ruchelman	Stanley

General conditions:

- Minimum duration of the subscription is 12 month with the same starting and end date for all participating members;
- Minimum number of participants requested: 10.
- Total annual fee per block of 10 users is € 3,890 ex VAT; effectively € 389 per year and per single user if 10 or more users share a license.

Contents of Module TRANSFER PRICING

- Transfer Pricing topical chapters for 55 jurisdictions,
- Transfer Pricing and Business Restructurings – online book,
- Transfer Pricing and Customs Valuation – online book,
- Transfer Pricing and Dispute Resolution – online book,
- Transfer Pricing and Intragroup Finance – online book.
- Quick Reference Tables (Transfer Pricing Tables)
- Models
- EU Law (Transfer Pricing only)
- International Organizations' Documentation (all Transfer Pricing related documents)
- Case Law (Transfer Pricing only)
- Country Chapters Comparison (Transfer Pricing)
- Transfer Pricing Tables Comparison

The following members showed interest. **Who else wants to join? Interested:**

France	FIDAG	Moro	Viviane	viviane.moro@fidag.com
Germany	Benefitax GmbH, Steuerberatungsgesellschaft, Wirtschaftsprüfungsgesellschaft	Biernat	Oliver	o.biernat@benefitax.de
Germany	FACT GmbH Wirtschaftsprüfungsgesellschaft	Schwechel	Bernhard	b.schwechel@fact-ks.de
India	M.L. Bhuwania & Co., Chartered Accountants	Bairagra	Ashish	ashish@mlbca.in
India	Zinzuwadia & Co - Chartered Accountants	Zinzuwadia	Vijesh	vijesh@zinzuwadiaco.com
Italy	Studio Baldi	Bedogna	Matteo	matteo.bedogna@studiobaldi.it
Slovakia	AT Partners, k.s.	Augustin	Marian	marian.augustin@atpartners.sk
South Africa	Nolands SA	Saggers	Graeme	graemes@nolandscpt.co.za
Spain	Ficesa Treuhand, S.A. Auditores y Asesores Fiscales	Frühbeck	Carlos	fruhbeck@ficesa.es
United Kingdom	Lawrence Grant, Chartered Accountants	Rajah	Alan	alan@lawrencegrant.co.uk
United States	Rowbotham & Company	Rowbotham	Brian	br@rowbotham.com

Interested in any IBFD products or free online trainings?

Please contact for more details, free online training or interest to license:

Pavel Grishunin MA, International Bureau of Fiscal Documentation
Regional Account Manager IBFD

E: p.grishunin@ibfd.org | M: +31623951715 | T: +31205540184

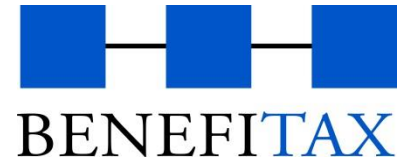
Address: Rietlandpark 301, 1019 DW Amsterdam, The Netherlands

50 grey zones in Taxation

- Project for Booklet to be discussed

- Information on participation in tax lectures during ITPG Meetings 2014 has been prepared by myself and GGI HO has been asked to prepare the certificates for senior members.

ITPG Winter Meeting 2016



- Where shall the ITPG winter meeting in 2016 take place?
- E.g. February 2016 (not 6th or 20th Feb.), better 27th Feb. or 13th Feb.
- Together with GGI MEA conference in the UAE?
- Organised by GGI HO means less work for me and host but more costs for all
- Nice weather but long flight times for many
- What do you think?
- Other suggestions?

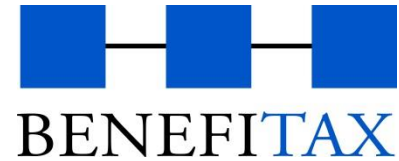
ITPG WebEx Meetings?

- **Problem 1: Time differences and different languages**
- Solutions:
- 3 different Web Ex meetings for different time zones /languages
- Joint meeting of Europe MEA and Asia Pacific
- Stand alone meeting for NA
- Stand alone meeting for LA in Spanish

ITPG WebEx Meetings?

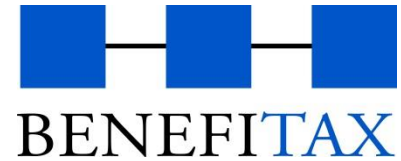
- **Problem 2: Little attendance**
- **Suggestions from ITPG chairs to make them more attractive**
- The regional chairs decide if they will have WebEx meetings in the future, unless the global chairs have a message to distribute.
- It is recommended to hold not more than 2 WebEx's p.a. per region
- It is recommended that they are timed sufficiently far enough away from other ITPG meetings and from each other. Mid- or late June and either early September or early December may work.
- It is not recommended to spend half of the WebEx time on administrative announcements and the content should be enhanced with at least one or two relevant pressies
- In NA the pressies should last at least 50 minutes in order to ensure the participants receive 1n hour of continuing education credits

ITPG Meetings 2015



- 11 Feb. 2015 : WebEx conf. for NA region (16)
- 16 Feb. 2015: WebEx conf. for Europe, AP and MEA region (20)
- 19.-22. Feb. 2015: Marbella/Spain: ITPG Winter meeting
- 3. March 2015: WebEx conf. in Spanish for LA region
- 16. April 2015: San Jose/Costa Rica: Latin American Conference
- 23. April 2015: Lausanne - Switzerland: GGI European Conference
- 14. May 2015: Las Vegas - USA: GGI Best Practices North America & GGI Developing Leaders North America
- 29. May 2015: Florence - Italy: Italian Business Summit
- 22. Oct. 2015: Boston - USA: World Conference
- 3. Dec. 2015 (tbc): Hong Kong: GGI Asia-Pacific Regional Conference

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Thank you for your attention !

Oliver Biernat

[Benefitax GmbH](#)

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