

## **Minutes GGI Practice Group Meeting International Taxation**

**Majorca, Hotel Gran Melia Victoria, 22 – 23 February 2008**

**Host: Ficesa Treuhand, S.A., Palma de Majorca (Carlos Frühbeck)**

### **1. Participants**

Claudio Cocca	Geneva Group International	Switzerland
Csaba Valentik	United Trust Consulting AG	Switzerland
Attila Kovács, Dr.	Kovács Rèti Szegheö Attorneys-at-Law	Hungary
Carlos Frühbeck	Ficesa Treuhand, S.A.	Spain
Peter Ormandi, Dr.	Geneva Group International	Switzerland
Alan Rajah	Lawrence Grant, Chartered Accountants	United Kingdom
Santiago Lapausa	Javier Carretero y Asociados - Abogados	Spain
Cees Roeleveld	United Trust Corporation (Netherlands) BV	Netherlands
Sergio Finulli, Dr.	Studio Dottori Commercialisti Bianchi-Finulli	Italy
Ionut C. Zeche	Mirus Advisers S.R.L.	Romania
Nick Brennan	Citroen Wells, Chartered Accountants	United Kingdom
Oliver Biernat	Benefitax GmbH	Germany
Graham Busch	Lawrence Grant, Chartered Accountants	United Kingdom
Marios Eliades	ELIADES & PARTNERS Advocates	Cyprus
Astrid Dorfmeister, Dr.	Dr. Frühbeck Abogados y Economistas y Cía, S.C., Barcelona	Spain
Robert D'Alessandro, Dr.	Advocates CREDAL	Malta
Niels Fischer	Fischer & Partner	Switzerland
Matias Garcias	Dr. Frühbeck Abogados y Economistas y Cía, S.C., Palma de Mallorca	Spain
Guido Weikler	Dr. Frühbeck Abogados y Economistas y Cía, S.C., Palma de Mallorca	Spain

### **2. Place**

The venue was the Hotel Gran Melia Victoria\*\*\*\*\* in Palma de Majorca. The host, GGI member firm Ficesa Treuhand S.A. proposed to organise the European Conference 2009 in this hotel.

### **3. Participants / Robert van den Wall Bake**

There was a total of 20 people attending (refer to the participants list). The Practice Group Chairman Robert van den Wall Bake cancelled at short notice by email at 21.2.2008 (without any justification). Therefore, the program compiled by Robert van den Wall Bake had to be completely restructured.

### **4. Professional lectures**

The lectures proposed by Robert van den Wall Bake could not have been held due to his short-dated cancellation. Claudio Cocca assumed the moderation of the meeting and created a new program.

#### **Spain:**

ETVE- The Spanish Holding Company (Dr. Carlos Frühbeck, Ficesa Treuhand S.A., Madrid)

#### **Spain:**

Fiscal Reforms and Anti-Avoidance rules / Impact on real estate transactions in Spain (Santiago Lapausa, Javier Carretero y Asociados - Abogados, Marbella)

#### **Switzerland:**

Flat Taxation in Switzerland for wealthy private individuals (Csaba Valentik, Eurotrust Partners AG, Zurich)

#### **United Kingdom:**

Changes of legislation regarding domicile & non-domicile status (Graham Busch, Lawrence Grant, London)

#### **Cyprus / Romania:**

Tax planning opportunities available for seconded expatriot personell  
(Dr. Marios Eliades, ELIADES & PARTNERS Advocates, Limassol / Ionut Zeche, Mirus Advisers SRL, Bucharest)

#### **The Netherlands:**

The effects of the new Tax Legislation of Holding Companies in the Netherlands (Cees Roeleveld, United Trust Corporation (Netherlands) BV, Amsterdam)

### **5. GGI Practice Group Guidelines**

The Practice Group Guidelines drafted by GGI head office and presented by Claudio Cocca were unanimously approved by the participants. In accordance with the new guidelines, the Chairman and Vice Chairmen of the Tax Practice Group were elected for a two-year term as follows:

Chairman:	Oliver Biernat, Benefitax GmbH, Frankfurt/Main, Germany
Vice-Chairmen:	Graham Busch, Lawrence Grant Chartered Accountants, London, UK and Ionut Zeche, Mirus Advisors S.R.L., Bucharest, Romania

The new Chairmen are elected with immediate effect. They have accepted their election.

### **6. Brochure**

The Tax Practice Group further approved the draft of the brochure on „International Tax Services” for printing. For a contribution to the costs (EUR 250.--) any member of the Tax Practice Group can be listed under tax experts and order a copy of the brochure. The costs cover layout and listing. Printing and distribution costs will be charged separately. Furthermore, we have decided the following alterations to the brochure:

- The letter-size shall be bigger (if possible) on page 4.
- General office e-mail addresses (e.g. inf@....) will not be published in order to save space.

- New members outside Europe shall be encouraged to become a member of the practice group.
- Oliver Biernat, Benefitax GmbH, will arrange the printing of the brochure in Germany.
- Every member interested in ordering the hard copy of the brochure shall inform Benefitax GmbH by e-mail to [a.rechel-goetz@benefitax.de](mailto:a.rechel-goetz@benefitax.de) until latest 10 April 2008 (2 weeks prior to the GGI European Conference in the Netherlands). Please indicate the number of ordered copies (minimum 50 copies).
- The costs of the brochure will be approx. 0.25 - 0.35 EUR per copy.
- Oliver Biernat will distribute the ordered brochures during the GGI European Conference in the Netherlands. If requested, the ordered copies can be sent as well to the company (the mailing expenses have to be paid by the purchaser).
- Every GGI Member can get the brochure as well as a pdf-file.

The contact persons (tax experts) listed in the brochure has to attend at least one Practice Group Meeting per year.

### **7. New Practice Group**

Dr. Attila Kovacs, Budapest, proposed to establish a new Practice Group with the topic "Insolvency Law". GGI Head Office will certainly support the establishment of this Practice Group.

### **8. Forthcoming Practice Group Meetings „International Taxation“:**

24 April 2008, 14:30 hrs	prior to the GGI European Conference in Noordwijk aan Zee
9 October 2008, 14:30 hrs	prior to the GGI Central & Eastern European Conference in Eisenberg, Austria
30 October 2008	during the GGI World Conference in Rio de Janeiro, Brazil

Zurich, 26 February 2008

Minutes taken by Claudio Cocca