

Minutes of a meeting of the Practice Group International Taxation held in Eisenberg, Austria, on Thursday 9 October 2008, 2.30 - 6 p.m.

Chairman:	Mr. Oliver Biernat			
Secretary:	Mr. Simon Perchard was appointed as Secretary for the purposes of the meeting.			
Participants:	Oliver Biernat Dr Roberto D'Alessandro Marios Eliades Alan Rajah Dr Jörg Steisslinger Csaba Valentik Peter Ormandi David Kidd Mark Healey Simon Perchard Alexander Koblišček Claudio Cocca Ugo Girardi Tobian Doth Anita Kova'cs Attila Kova'cs Peter Kaeser Cees Roeleveld Peter Vdovin Nicola Maslovaric	Benefitax GmbH Credaltrust Eliades & Partners Lawrence Grant Dr Vaih & Partner Eurotrust Partners AG Eurotrust Partners AG Citroen Wells Volaw Trust .Volaw Trust FPS Fritze Paul Seelig GGI BCG Refidate BCGE PB Kova'cs Reti Eleheo Kova'cs Reti Eleheo GGI URC McKinven Consulting Simie & Partnerji dao	Frankfurt Malta Cyprus London Stuttgart Zurich Zurich London Jersey Jersey Frankfurt Zurich Rome Zurich Budapest Budapest Dubai Alhmaan nl Moscow Slovenia	o.biernat@benefitax.de rd@advocredal.com meliades@eliades.eu alan@lawrencegrant.co.uk steisslinger@vaih.de valentik@unitedtrust.ch ormandi@eurotrust.net David.Kidd@citroenwells.co.uk mhealey@volaw.com sperchard@volaw.com Koblišček@fps-law.de cocca@ggi.com ugo.girardi@bcgstudio.it Fabian.dotti@bcge.ch ihasz.anita@krs.hu kovacs.attila@krs.hu kaeser@ggi.com info@united-trust.nl pvdovin@mkcg.ru niko.maslovaric@simic-partnerji.si

Agenda

1. Welcome by the Chairman
2. Discussion on technical problems with video conferencing; discussion on alternatives?
3. Views on links in International Taxation (to include publication of list on intranet)
4. GGI Insider article on Chairmen of GGI Practice Groups
5. Presentation of Practice Group at Latin American Conference
6. Brief Presentation from new and old member firms participating in the Practice Group
7. Discussion on transfer pricing databases
8. Presentation by the Task Force; creating flyers on "doing business in ..." for every member country
9. Discussion of a common list of clients as proposed by Ionut Zeche at the Noordwijk Meeting
10. Update Workshop Members List on the GGI Home Page by the end of 2008
11. Additional information on GGI International Tax Practice Group Members specialisations
12. Update from the Task Force on description of the Practice Group within the GGI Intranet to include development of guidelines through intranet display
13. Discussion on Proposal of a "International Tax Newsletter"
14. Presentation from Marios Eliades
15. Presentation from Alan Rajah
16. Presentation from David Kidd
17. Other Topics
18. Topics for meeting in Rio
19. Closing

	Subject	To Do	In Charge	Due Date
1.	Welcome by the Chairman: The Chairman opened the meeting and welcomed all participants.			
2.	Technical Problems with video conferencing; discussion on alternatives? It was noted that the hosting of Practice Group sessions through the use of video conferencing would be technically too difficult and expensive for a substantial number of members. It was also noted that not many participants make use of Skype.	More information on Skype shall be provided at the Rio meeting.	Oliver Biernat	08-10-30
3.	Views on links in International Taxation (to include publication of list on intranet) All participants and other Int. Tax Practice group members are asked to send interesting links on international taxation in the internet to the chairman who will make them available for all GGI members in the Intranet.	Internet links on international taxation to be sent to chairman.	All members	08-10-30
4.	GGI Insider article on Chairmen of GGI Practice Groups The first article from the new GGI editor Doris Pangelinan was on Oliver Biernat and was intended to make the work of our practice group more known to all GGI members.			
5.	Latin American Conference: The Chairman noted that he would be attending the Latin America Conference in Rio and will be granted some minutes to introduce the International Tax Practice Group to participants and to discuss opportunities for working together with Latin American colleagues.		Oliver Biernat	08-10-29
6.	Presentation of Members: All of the attendees made a brief presentation of themselves, their firms and their fields of work.			
7.	Transfer Pricing Database: It was noted that Niels Fischer (excused at this meeting) has taken responsibility for collection information on Transfer Pricing Databases, which could be bought by GGI and costs could be shared among interested members. The Chairman introduced to the meeting the Van Dyke database, which is very detailed and used by the German fiscal authorities. As it is too expensive (more than € 100,000 per year) to buy and share costs between members he offered that other practice group members may use this via a freelancer of Benefitax. Costs to be paid to Van Dyke and the freelancer for searching transfer prices will probably amount to some thousand Euros. Members interested may contact the chairman The Chairman also circulated details of a database produced by IBFD and noted that the link to that web database could be found in the GGI intranet.		Niels Fischer	08-10-30

	Subject	To Do	In Charge	Due Date
	Marios Eliades (Cyprus) and Csaba Valentik (CH) noted that they would be interested in IFBD database.			
8.	Information Flyers on “Doing Business in”: As agreed at the Noordwijk Meeting the Task Force will co-ordinate a common layout and ask members to prepare such documents for many countries and put them in the intranet or even internet. .	Preliminary presentation and follow-up at the Rio Conference.	Carlos Frühbeck, Dr.Roberto d’Alessandro, Ionut Zeche	08-10-30
10.	Workshop Members List: The Chairman will update the members list of our practice group by the end of 2008. Only active members of the Practice Group should be listed (participation of at least one meeting per year)		Oliver Biernat	After Rio meeting
12.	Intranet – update from Task Force: Alan Rajah (UK) presented a paper on the intranet. It was noted that to obtain access to the intranet participants need to contact headquarters and obtain a password. The following matters were discussed: <ul style="list-style-type: none"> • Administration - this should be done centrally with the headquarters being proposed as administrators. • Publication by each member – discussions were held as to how this would be controlled; • Consideration was also given to restructuring the intranet by country. • It was also noted that country member co-ordination would be required to ensure no duplication. • It was agreed that publications would be sent to Doris at the headquarters. • It was also noted that Doris is capable of doing translation into English from several languages. • A discussion on the use of the intranet was undertaken and it was agreed that the existence of accessibility to the intranet must be communicated across the network. The Chairman proposed that a note about the Intranet be made in the next edition of the Insider. • It was agreed that it was important for the intranet to maintain up-to-date country profiles to include information under the “Doing Business in ...” flyers. 	Note about the Access to the GGI Intranet to be published in the next edition of the Insider.	Carlos Frühbeck, Nick Brennan, Alan Rajah GGI-HQ: (Doris Pangelinan)	Nov. 08 (next Insider)
13.	Proposal for an International Tax Newsletter: A discussion was had regarding the question of creation and maintenance of a separate regular International Tax Newsletter by GGI members. The discussion also considered an alternative, namely a regular specific section for tax commentary included within the Insider publication. It was agreed that no separate International Taxation Newsletter would be published (too time-consuming) but the Insider publication should include a regular	No separate newsletter; special section in Insider (1 page, 2 articles), including details + photos of authors	Chairman coordinates. Next articles by: Csaba Valentik, Alan Rajah, Peter Vdovin, Mark Healey/ Simon	Next Insider (?)

	Subject	To Do	In Charge	Due Date
	<p>section with reports on International Taxation Issues or news from our practice group.</p> <p>The following members agreed to make contributions to the new section within the Insider:</p> <p>Csaba Valentik (CH); Alan Rajah (UK) Peter Vdovin (Russia) Mark Healey / Simon Perchard (Jersey) Marios Eliades (Cyprus) Oliver Biernat (Germany)</p> <p>Albeit the Chairmen noted that this was an invitation open to all.</p> <p>The Chairman asked members who wish to submit documents to contact him in advance of such submission in order to have a regular page and not concentrate all news in one issue.</p> <p>It was also agreed that the articles should remain fairly light and not get too technical.</p> <p>It was further agreed that the Practice Group would attempt to publish two articles per copy of the Insider (with one page being set aside within the Insider for such information). It was also agreed that the author details and, possibly a photograph, be attached to each article to allow members and all their clients/contacts to contact the author for further discussion.</p>		Perchard, Marios Eliades, Oliver Biernat	
14.	<p>Presentation from Marios Eliades: Marios made a brief presentation to the meeting regarding his continuing work with Ionut Zeche (Romania) and their forthcoming conference to be held in Limassol/Cyprus.</p>			
15.	<p>Presentation from Alan Rajah: Will be held at the next meeting in Rio. Was postponed due to lack of time</p>		Alan Rajah	08-10-30
16.	<p>Presentation from David Kidd: David made a brief presentation to the meeting on significant changes in 2008 to the taxation of foreign nationals living in the UK.</p>			
17. a	<p>International Taxation Services Brochure: It was noted that the 2008 version had been published and that entries for the 2009 Edition would be welcome from permanent members of the practice group.</p>			
17. b	<p>Vienna Easymeet: It was noted that next year's Easymeet will be held in Vienna. The Chairman noted that there is currently only a legal emphasis to the workshops in the agenda and that the host was looking to have someone from our Practice Group to attend and chair</p>	Contact Aurelia Tramosch in Vienna: aurelia@tramosch- partner.com	all	asap

	Subject	To Do	In Charge	Due Date
	<p>a workshop on taxation matters.</p> <p>The Chairman also took the opportunity to outline the brief history and workings of the Easymeet – being designed for junior staff members and managers with the potential to become partners</p>			
17. c	<p>Communication from Sergey Petrov: The Chairman circulated a note received by a Mr. Sergey Petrov with the offer to sell a directory with listings of companies in many Eastern European countries. Peter Vdovin (Russia) noted that he would be willing to assist members with their information on Russian companies.</p>			
18.	<p>Next Conference: It was noted that the next conference will be held in Rio, at which the Chairman will be in attendance.</p>			08-10-30
19.	<p>Meeting Closure: The Chairman thanked all participants and closed the meeting at 6.00pm.</p>			