



Meet the IR Tax Group

Our members are leaders of the cross border tax community. They are proud to uphold the highest ethical standards and offer an unrivalled quality of service to clients all over the world.



Who are IR Global?

IR Global was founded in 2010 and has grown to become the largest practice area exclusive network of advisors in the world. This incredible success story has seen the network receive recognition and be featured in a plethora of ranking and publications such as Chambers and Partners, Legal 500, the Financial Times, Lawyer 360, Thomson Reuters to name just a few.

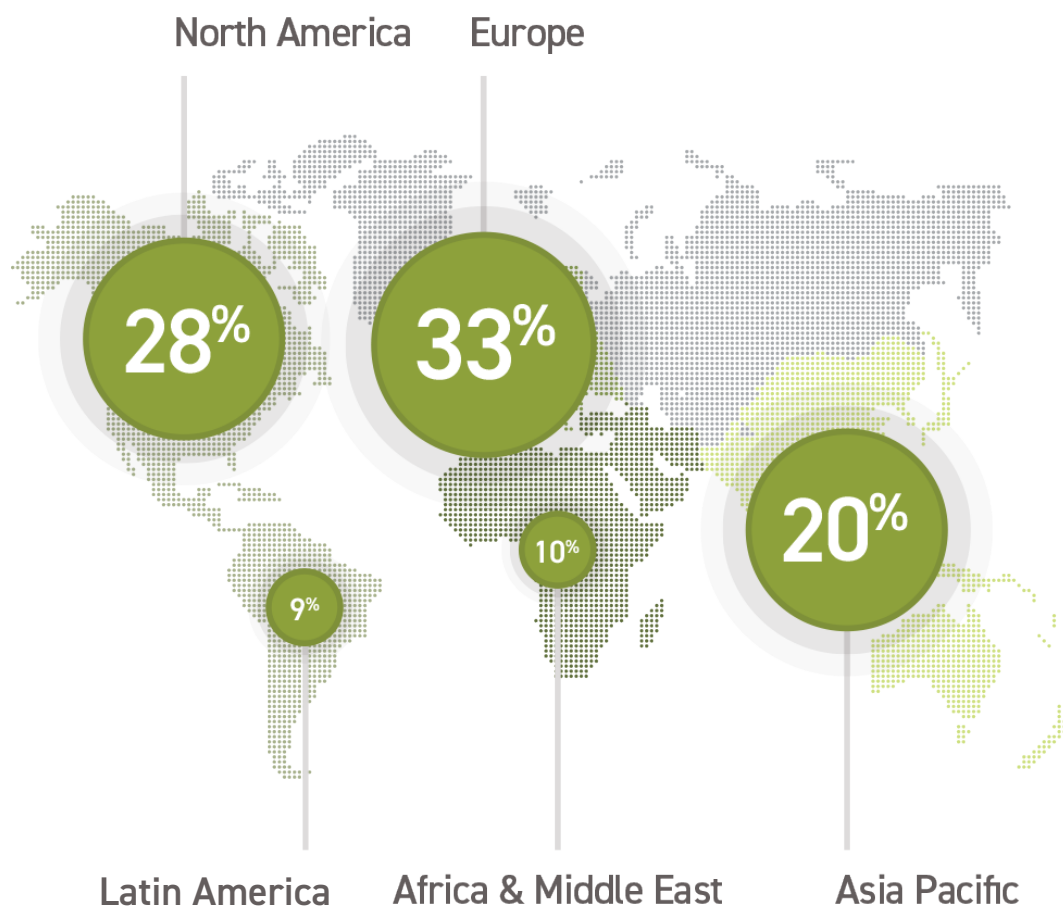
IR Global, the future of professional services

IR Global is a multi-disciplinary professional services network that provides advice to companies and individuals in over 155+ jurisdictions.

We are a community of like minded individuals and a global network which cultivates a giving mentality and putting the client's needs first.

The traditional role of the adviser has changed and today businesses require more from their lawyer, accountant or business adviser. We are at the forefront of this transition and focus on providing results in consideration of long term strategic goals.

We believe the archaic 'professional service firm' model is dying due to it being insular, expensive and slow. In IR Global, forward thinking clients now have a credible alternative which is open, cost effective and flexible.



The Members



Vetting

Members are subjected to a stringent vetting process upon joining. During this process we analyse firm reputation, rankings and gauge feedback from local IR members and connections in their jurisdiction. Finally a face to face meeting or conference call is set up to ensure the applicant is aware of group expectations and ethos.

Protocols

The relationship between referrer and recipient is to be one of transparency and respect at all times. There is also a protocol in place for referring clients and best practices.

More information can be found in the referral protocol chapter of the member handbook.


<https://bit.ly/2vglak7>

Working Groups

IR has a strong focus on practice area expertise and regional knowledge, ensuring clients get the very best advice, no matter how niche the requirement. Within the group we have 12 working groups, each headed by a steering committee of experienced and innovative member firms from different countries around the world. Their role is to handle communication within the group, the coordination of multi-jurisdictional cases and most importantly, ensure businesses and individuals receive unrivalled quality of service and value.

www.irglobal.com/working-groups

Why Use the IR Global Network?

 <p>Niche Expertise</p>	 <p>Big Firm Experience</p>	 <p>Multi-Disciplinary</p>	<p>SPEAK with your own advisor for an introduction to another member</p> <p>SEARCH via the website and identify the right advisor to fulfil your requirements</p> <p>CONTACT the IR Global head office and speak with a member of the team for support.</p>
 <p>Cost Effective Billing</p>	 <p>Close Cooperation</p>	 <p>Speed of Response</p>	
 <p>Local Knowledge</p>	 <p>Partner Led</p>	 <p>Personal Service</p>	

IR Global Tax Network

IR Global Tax Network

The IR Global Tax Network has member firms in 60+ jurisdictions around the world. Each member is carefully vetted on their firm's expertise and experience. Our members are proud to hold the highest ethical standards and be at the forefront of the cross border tax community.

We offer world-wide expertise, through the cross-border sharing of tax knowledge between different jurisdictions for corporate & individual persons. We are able to ensure that the client has the optimum structure that the legislation in various jurisdictions have to offer.

Furthermore, the group has a clear understanding and experience dealing with the global implications of the Base Erosion and Profit Shifting (BEPS) regulations, transfer pricing, common reporting standards (CRS), the mandatory disclosure directive (MDD), the exchange of tax rulings, country by country reporting, master and local file requirements and the disclosure requirements of the Foreign Account Tax Compliance Act (FATCA)

Tax Advisory Services and Expertise

- Tax policy & administration
- Tax code of conduct
- Direct & indirect taxes
- Tax reporting & associated advice
- Tax controversy & dispute resolution
- Mergers & Acquisitions
- Tax due diligence
- Cross-border structuring & international tax issues
- Transfer pricing
- Complex tax advice for High Net Worth Individuals (HNWIs)
- Tax code of conduct
- Expatriate taxation



Meet the Committee



Chris Downing

Inspire Professional Services
Ltd, United Kingdom



Friggo Kraaijeveld

KC Legal, Netherlands



**Wissam
Abousleiman**

Abousleiman & Co, Lebanon



Janusz Fiszer

GESSEL, Poland



Neil Smith

Nordeq Management A/S,
Denmark



Stéphane Ebel

duvieuart ebel, avocats
associés, Luxembourg

Tax Group Initiatives



The Role of the Committee

The IR Tax committee speaks on a regular basis and meets at each of our international events. Furthermore, once a quarter we have a conference call that defines group strategy. This encompasses quality standards, new member recruitment, tools which can improve our advisory offering and initiatives that can create value to members and clients alike.

Events

The network hosts four international events per year. This is vitally important aspect of the network as it supports the development of close bonds and working relationships between members. Thus ensuring clients have a consistent service through firms that are like minded and have a mutual understanding.

The Unique Offering of IR Global

We combine forces and in-depth tax expertise from IR Global experts around the world. We are subsequently able to offer the highest quality services without the huge overheads and pyramid like structures of the large multinational professional services firms.

In addition, as tax crosses all areas of business, the IR tax group is in regular content and has close co-operation with the other IR Practice Group committees and members, including M&A, Private Client, Real Estate to name a few. Meaning no matter what the requirement we can bring in the necessary expertise.

As Featured In



FINANCIAL TIMES



WealthBriefing

AccountancyAge

GLOBAL BANKING &
Finance
review



People Management



Publications

Our virtual series of publications brings together members around the world to share knowledge and discuss topical issues.

Common Reporting Standards - Imminent implications for client tax reporting

Common Reporting Standards (CRS) is an initiative that began in 2014 with the ambitious and high-minded goal of creating full transparency into the tax affairs of citizens in all Organisation for Economic Cooperation and Development (OECD) member countries.

On July 21, 2014, the OECD released the first version of the Standard for Automatic Exchange of Financial Account information in Tax Matters, which would form the basis of the CRS framework to come.

By December 2015, over 95 jurisdictions had signed or were committed to sign the CRS. More than 50 jurisdictions were considered 'early adopters', meaning they started to automatically exchange in 2018.

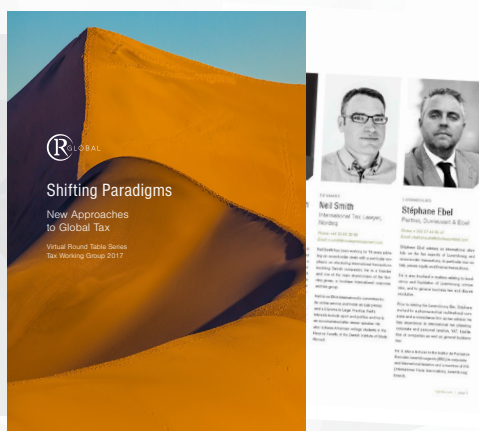


Shifting Paradigms - New Approaches to Global Tax

There has been a discernible shift in attitudes to global tax.

Transparency has become a buzzword among tax professionals since the 'Panama Papers' leak rocked the world in 2016. Ongoing initiatives concerning transfer pricing, offshore entities and common reporting standards, among others, all now seek to increase the transparency around where profit is earned and wealth accumulated.

International bodies such as the OECD and European Union have sponsored these extensive initiatives, as the countries are keen to receive a greater share of tax profits and wealth derived within their jurisdictions or complied by their citizens.



Tax Efficient Inbound Investment - Tax Structures for Cross-Border Acquisitions

Anyone considering an inbound investment into another country or jurisdiction must give serious thought to taxation. Issues such as privacy, accurate asset valuation and liability protection are important, but it is the tax efficiency of a foreign investment that will most likely measure its long-term success.

There are, of course, many different types and methods of investment, whether that be via direct acquisition of a capital asset, the purchase of shares in an existing business or a real estate transaction. A smart investor will study the rules and regulations that apply to each scenario in their jurisdiction of choice, and adhere to them while minimising tax liability.



Case Study:

Smooth Takeoff for Cross-Border Privatisation

In late 2015, Polish investor Linetech Holdings S.A. became interested in acquiring listed Slovenian airline maintenance business Adria Airways Tehnika.

In a two-phased international bidding process Linetech acquired all shares in the firm for EUR 5 million, buying them from a consortium of shareholders headed by Slovenian Sovereign Holdings and Aerodrom Ljubljana.

Linetech was represented in Poland by Gessel and in Slovenia by ODI Law, both members of the IR Global network. Slovenian Sovereign Holdings were represented by international law firm Schoenherr.

Gessel directed their client to ODI Law for its Slovenian representation after two partners, Janusz Fiszer and Uroš Ilić, met at an IR Global conference.

The deal contained a range of complex cross-border issues that needed to be navigated carefully and although the transaction was primarily an M&A-driven one, a proper tax structuring on both sides has been crucial for its success. Furthermore, it was imperative that Linetech had quality representation in Slovenia to help them to structure the share and asset deal (assignment of receivables) in accordance with Slovene law and anti-competition legislation. Post-closing integration was also crucial.

Networks allow our teams to function in a manner similar to international firms.

Uroš Ilić, Managing Partner at ODI, believes building up non-formalised networks with leading law firms globally enables him to assist clients in the best possible way when it comes to international transactions and cross-border due diligence.

He says: "Networks allow our teams to function in a manner similar to international firms. The clients can rely on us for coordination, and the attention they receive from our partners is generally higher than in an international full-service firm."

Cross-border deals form an important part of ODI's practice and the firm places a strong emphasis on their development.

Ilić adds: "We partner with leading law firms globally, allowing us to handle most incoming client requests. Several international clients were won via referrals from our foreign cooperation partners. Apart from winning new clients, we also retain existing clients through the delivery of excellent cross-border services."



Dr Janusz Fiszer, Partner at GESSEL



Contacts

UK HEAD OFFICE

IR Global
The Piggery
Woodhouse Farm
Catherine de Barnes Lane
Catherine de Barnes B92 0DJ

Telephone: +44 (0)1675 443396

www.irglobal.com
info@irglobal.com

COMMITTEE MEMBER CONTACTS

Chris Downing
Inspire Professional Services Ltd,
United Kingdom
chris@inspire.uk.net

Friggo Kraaijeeld
KC Legal,
Netherlands
fkraaijeveld@kclegal.nl

Wissam Abousleiman
Abousleiman & Co,
Lebanon
wissam@abousleimangroup.com

Janusz Fiszer
GESSEL,
Poland
j.fiszer@gessel.pl

Neil Smith
Nordeq Management A/S,
Denmark
n.smith@nordeqmanagement.com

Stéphane Ebel
duvieuxart ebel, avocats associés,
Luxembourg
stephane.ebel@duvieuxartebel.com

