

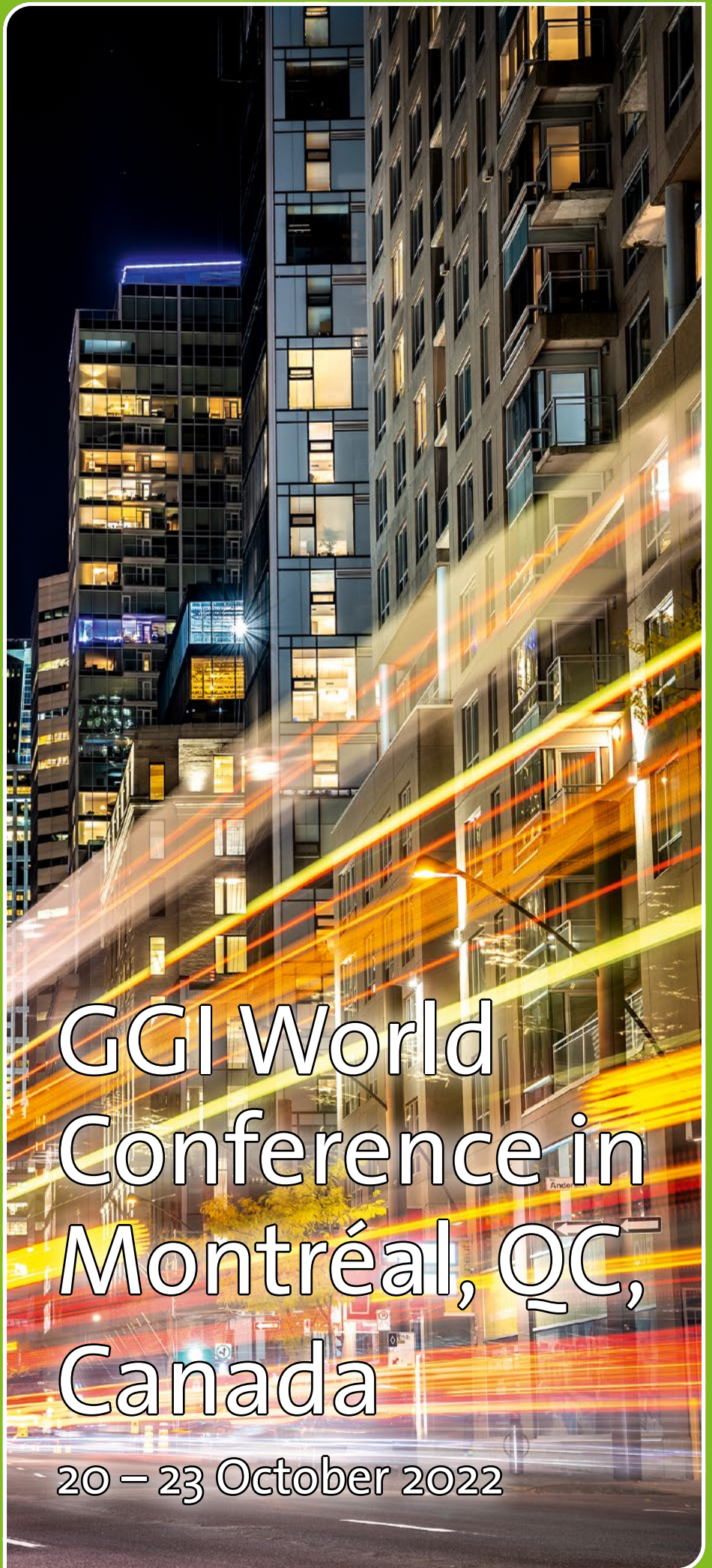


INSIDER

News and
Information
for Members
and Friends
of GGI

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GGI World Conference in Montréal, QC, Canada

20 – 23 October 2022

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Editorial

Dear Reader,

Welcome to the Autumn 2022 issue of the *INSIDER*. We hope you all have had a wonderful summer. Here you find another issue with wonderful articles from all across the globe.

In addition to providing you with a brief review of GGI's recent in-person meetings of the German-Speaking Chapter in Madrid, Spain, and the US Southeast Chapter in Greensboro, North Carolina, we hope to pique your interest with details of the GGI World Conference in Montréal, Canada, as well as the GGI Asia-Pacific Regional Conference taking place in Bangkok, Thailand, in December.

As always, we love to shine a spotlight on you, our members, and hope you enjoy reading the achievements and news from your GGI colleagues.

We thank all authors for sharing their expertise with us: Raf Uzar,

Warsaw, Poland, updates on “Hybrid Leadership”. Gregory Dean of USTAXFS (Zurich, Switzerland) explores the Maltese pension plans under the Malta/US Income Tax Treaty and Louis de Schorlemer writes about “Dealing with Legacy in M&A”.

Turn to the GGI Practice Group (PG) pages to read summaries of the upcoming meetings that will be held during the GGI World Conference in Montréal.

We wish you an enjoyable read and if you are interested in having your voice heard or have some interesting company news you want to contribute, please get in touch. We look forward to seeing you soon at future GGI events.

Your GGI Team

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Diary of Upcoming Events

- **GGI Latin American Regional Meeting**
Montréal, QC, Canada
19-20 October 2022
 - **GGI French-Speaking Chapter**
Montréal, QC, Canada
19-20 October 2022
 - **GGI World Conference**
Montréal, QC, Canada
20-23 October 2022
 - **GCG Capital M&A Dealmakers Meeting**
Montréal, QC, Canada
20-23 October 2022
 - **GGI Asia-Pacific Regional Conference**
Bangkok, Thailand
01-04 December 2022
 - **GGI ITPG Global Tax Summit**
Nassau, The Bahamas
18-19 January 2023
 - **GGI NA Best Practices & Marketing Professionals Conference**
Nassau, The Bahamas
19-21 January 2023
 - **GGI Chairpersons Meeting**
Zurich, Switzerland
03-05 February 2023 (TBC)
 - **GGI Middle East & Africa Regional Conference**
Dubai, UAE
10-12 February 2023 (TBC)
- Please refer to [our website](#) for more information and additional events (Events > [Upcoming Events](#)).

Montréal, QC, Canada | 20 - 23 October 2022

GGI World Conference



Biosphere of Expo 1967 – now a water museum in Montréal

Our annual GGI World Conference is now a mere few weeks away. We are very excited to meet with so many of our long-standing GGI members, as well as several new ones. As in the other events we have held this year, we very much look forward to catching up with each other in the typical extraordinary yet familial GGI atmosphere. Over the years we have gained so many enriching memories through our joint experiences – it would be worth writing a book about all the anecdotes and the shared moments together. Let's see what we have to add after Montréal.

Our host firms, GGI members Labranche Therrien Daoust Lefrançois and Ravinsky, Ryan, Lemoine LLP,

have worked hard to contribute to the success of this event, as well as the programmes just prior.

Any interested participants at the Conference will have the opportunity to attend either the GGI French-Speaking Chapter Meeting (which will be in French) or the GGI Latin American Regional Meeting (which will be in Spanish), both of which will be held simultaneously on Thursday morning.

The objective of the French-Speaking Chapter Meeting is for French-speaking members to get to know one another better, and to exchange experiences and information on competences and areas of practice



Montréal in autumn

in order to build a sound base for joint business opportunities. In addition to networking, the following topical presentations are planned:

- Prof Dr Michel De Wolf (DGST Réviseurs d'entreprises, Belgium) will discuss "État de l'Union

européenne après les élections françaises et en drôle de guerre".

- Investissement Québec will talk about their services as a para-governmental body that helps Québec businesses grow internationally and

that also helps international businesses grow in Québec.

Dr Miguel Mantelli, Regional CEO GGI Latin America, will lead the Latin American Regional Meeting, where there will be the opportunity for Spanish-speaking members to exchange specific, deal-related, and company information to build a foundation for future business opportunities. Valuable topical presentations will also be delivered.

The World Conference officially begins on Thursday afternoon, with the meetings of the International Taxation Practice Group (ITPG) and the Global Political Economy & International Relations Special Interest Group. New members and first-time participants at a GGI event should also make sure to sign up for the "Understanding GGI" workshop that afternoon.

In the evening, participants will gather in the Ritz-Carlton Hotel for



Old Montréal, a historic district and home to the Old Port

the Welcome Reception and Dinner, where we will also introduce the many attending new member firms.

After the plenary session on Friday morning, GGI Practice Groups and Special Interest Groups will kick into action, providing two rounds on Friday afternoon and another one on Saturday morning. Read from [page 21](#) what to expect, and make sure that you have registered for the specific meetings you would like to attend. Don't miss this chance to participate in lively discussions with like-minded experts from the same or similar fields of interest. Broaden your network of truly global specialists. (Please email [Anita Szoeki](#) if you would like to make any changes to your schedule.)

There are also several opportunities during the Conference to explore this very interesting city and surrounds.



The Laurentians, a range of mountains in Quebec, north of the city

The following optional excursions have been planned – make sure you are registered for the ones you'd

like to go on as priority is given to pre-registered participants.

On Thursday and Saturday, for example, one of the walking tours will cover Old Montréal. Located along the St Lawrence River, Old Montréal adds European-style historical wealth to the heart of a North American metropolis. From the site of the ancient fortified city, one can observe the outline of the streets, monuments and archaeological features dating back from the 17th to 19th centuries.

Virtually untouched by the modern downtown core, this unique historical site is a testimony to architectural innovation. The sounds of horses' hooves and "calèche" wheels are still heard along the narrow cobblestone streets of Old Montréal, flanked by 18th and 19th century grey-stone buildings. Old Montréal also overlooks the Old Port, one of the largest refurbished old ports in the world.

On the Friday, accompanying persons will be able to go to Saint-Sauveur, the jet-set destination in the Laurentians and Montréal's favourite destination for the weekend. This magnificent region of mountains, lakes and open spaces is just 45 minutes from Montréal. The Vallée de Saint-Sauveur also offers distinctive boutiques, diversified art galleries, taste pleasures, and gastronomy.

Registration for the GGI World Conference is still open (go to our website [ggi.com](#) > log in to the internal area > Events > Upcoming Events > locate the Conference > click on the external link). The Conference will be held at the Ritz-Carlton Montréal Hotel. Unfortunately, all the available rooms sold out early. However, there are still some rooms available in the Sofitel Montréal Golden Mile across the road, where the Closing Gala Dinner will be held on Saturday night. Do register as soon as possible to make sure you get one of these.



Montréal Convention Centre



Montréal: Square Saint Louis with colourful houses



Bangkok, Thailand | 01-04 December 2022

GGI Asia-Pacific Regional Conference

According to Lonely Planet, it's Bangkok's contradictions that provide the "City of Angels" with its complex, multifaceted personality. Here, air-conditioned megamalls sit side by side with 200-year-old village homes; golden-spired temples share space with neon-lit

strips of provocative entertainment; slow-moving traffic is bypassed by long-tail boats plying the canals and riverways. Buddhist monks dressed in saffron robes shop for the latest smartphones, and streets lined with food carts are overlooked by restaurants

perched at the tops of skyscrapers. As Bangkok races towards the future, these contrasts are only poised to increase and intensify, even while supplying the city with its unique and ever-evolving notion of Thai cosmopolitanism.

We've already been to this beautiful Asian city several times previously – it's certainly an easy destination to get to, not just for our members in the region but also from Europe and North America. For this event, we will be at the Anantara Siam Hotel, a little closer to the busy business district but close to the skytrain and within walking distance to some of Bangkok's most exclusive malls.

The contract is signed and the event is confirmed. We are still planning the programme but registration will be open shortly, within the internal area of [our website](#) once again.



Wat Phra Kaew temple in Bangkok, Thailand



Madrid, Spain | 23 - 25 September 2022

GGI German-Speaking Chapter Meeting

Small, but powerful could be the title of this meeting. Due to the chaos at many airports, a relatively small number of participants gathered in Spain's beautiful capital for the German-Speaking Chapter Meeting. The meeting was small, but intense. Small, but valuable. Small, but loads of fun. Small, but packed with enriching experiences. Small, but brimming with so many takeaways for the daily business. Small, but resulting in intensified friendships. Small, but wow.

Around 40 German-speaking GGI members met in Madrid at the Intercontinental Madrid. The event was generously hosted by GGI member

firms Dr. Frühbeck Abogados SLP and Ficesa Treuhand SAP. Both firms are German-speaking firms in the heart of Spain and two of the longest-standing GGI members. After a long absence of in-person German-Speaking Chapter meetings, it was absolutely fabulous to catch up and laugh together.

On Friday afternoon, early arrivals enjoyed a first impression of this vibrant city with a VIP walking tour through "Madrid de los Austrias". This name was given to the oldest part of the city during the reign of the Habsburgs, known in Spain as the Casa de Austria. The conference officially kicked off with a

welcome reception and dinner in the hotel on Friday evening.

This year's conference programme was centred on the topic of **digitisation**. Keynote speaker Christian Bredlow delivered a stimulating presentation "**Back from Home – Back to Work**". During the pandemic, new working time models were implemented for remote workers, commuting was reduced or even eliminated, and employees adjusted to digital collaboration in teams. Christian Bredlow discussed the conflict between digitisation, "new work", talent recruiting, and the challenges faced by companies which are not yet sure whether the question,



“Does digitality need a physical space?” can be clarified using rigid rules. He also addressed the question: (How) do we get back to the office? Christian’s speech provided a lot of food for thought and discussion, and provoked intense discussions during interactive group work sessions. Participants were so engaged in exchanging ideas and experiences that they continued their inspiring conversations through lunch and the afternoon’s sightseeing programme.

In the afternoon, delegates and their guests visited Liria Palace, home to one of the most important art collections in the world.

Thanks to Inés Frühbeck-Carretie, we enjoyed an outstanding Saturday dinner at the [Private Club Alma Sensai](#). Members of the club are exclusively women, but thanks to Inés, all GGI guests (both men and women) were

most welcome during this event. The Club was a unique venue and all GGI guests highly enjoyed their talks over drinks and a delicious dinner in this elegant atmosphere.

The participants who had the pleasure of staying on Sunday joined an excursion to the picturesque town of Alcalá de Henares, just 30 km from Madrid’s city centre. It was a very relaxing end of the conference, strolling through narrow streets with GGI colleagues, admiring breathtakingly beautiful architecture, and enjoying lunch at La Terraza del Mercado restaurant with its spectacular views of the historic city centre.

This conference once again provided the perfect mix of valuable lectures, discussions with GGI fellows, and jointly discovering hidden treasures and enjoying Spanish hospitality with GGI colleagues.



A gathering in Greensboro – US Southeast Chapter in-person meeting

By [Niko Brosnihan](#)

GGI is an alliance built on personal relationships. The ability to meet, network, learn and collaborate are hallmarks of our alliance and we are thrilled and thankful that our members exemplify these values throughout the GGI world. Our North American members also reflect these qualities and they were on display in full force most recently at our Southeast Chapter in-person meetup.

On 18 and 19 August 2022, [Brooks, Pierce, McLendon, Humphrey & Leonard, LLP](#) and [DMJPS PLLC](#) graciously hosted the Southeast Chapter for a dinner and half-day meeting in the DMJPS office in Greensboro, NC. Chapter members include AVILA Law, Baldwin & Associates, Brooks, Pierce, McLendon, Humphrey & Leonard, LLP, Bush Ross P.A, Christian & Barton, LLP, DMJPS PLLC, J. Lee Lloyd, LLC, Offit Kurman, Attorneys At Law, Haynsworth Sinkler Boyd, P.A., Taylor English Duma LLP, and ZOMMA Group.

We began the event at one of Greensboro’s premier restaurants, Undercurrent, where we shared a fantastic reception and dinner. Like all GGI member events, the conversations lasted well past the scheduled cocktail hour, and likely later than the expected reservation time at the restaurant. After a fantastic meal, we retired to Proximity Hotel, located just across the road from DMJPS’ office.

...next page



DMJPS PLLC Office, Greensboro, NC – from left to right: Niko Brosnihan, Chris Gill, Henry Willett, Joe English, Nick Nicholson, Lee Lloyd, Karen Wilcox, Reid Phillips, Caren Rodriguez, Mark Davidson, Mike Gillis, John Giordano. (Honorary mention to Tim Lynch and Milton Howell, who were also in attendance, but didn't make the picture.)

The next day began with a breakfast generously provided by our hosts and then we launched into the meeting agenda. The discussion included topics such as firm culture, employee recruitment and retention, diversity and inclusion, growth strategies, competitive analysis of

respective markets, and upcoming GGI events and opportunities. The group shared with one another best practices, strategies, and advice relevant to the topics mentioned.

The Southeast Chapter meeting in Greensboro was a tremendous success. While the group will revisit many, if not all, of the topics raised in the coming months, this member-organised, in-person meeting is an example of the importance of personal relationships. More importantly, it serves to strengthen the bonds our GGI members share and their commitment to serving their clients in any jurisdiction, with any challenges they may face.

To participate in this meeting was a great honour. I strongly encourage GGI members globally to connect with fellow members in their region, and if possible, find time to solidify their relationships over a dinner or by organising a meeting. These personal relationships can only serve to benefit your firms and, of course, your clients. I very much look forward to the next Southeast Chapter in-person meeting and look forward to working with other regions of North America to establish a similar event.

Thank you again to our gracious hosts, **Brooks Pierce** and **DMJPS**, and thank you to all members of the Southeast Chapter for their participation!

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NEW GGI / GCG MEMBER FIRMS

WE WISH TO EXTEND A VERY WARM WELCOME TO OUR NEW AND DISTINGUISHED MEMBERS.

JORDAN



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Johud Consulting

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T: +962 6 554 7109

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Company languages:

Arabic, English

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Services:

Advisory, Auditing
& Accounting, Tax



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PHILIPPINES



GGI member firm

ZG Law

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& Accounting, Tax



Scott L. Irvine

NEW GGI / GCG MEMBER FIRMS

WE WISH TO EXTEND A VERY WARM WELCOME TO OUR NEW AND DISTINGUISHED MEMBERS.

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Services:
 Advisory



Justin Craig



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 GGI member firm
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Whisman Giordano & Associates, LLC ranks nationally as one of the “Best Accounting Firms to work for”

Whisman Giordano and Associates, LLC is pleased to announce for the second time in three years it has been recognised nationally as one of Accounting Today's 2022 Best Accounting Firms to Work For. Accounting Today partners with Best Companies Group to identify companies that excel in creating quality workplaces for employees.

This survey and awards programme identifies, recognises, and honours the best employers in the accounting profession, benefiting its economy,



Joseph V. Giordano

workforce, and businesses. The list is [📄](#) made up of 100 firms.

Firms from across the United States entered a two-part survey process to determine Accounting Today's Best Accounting Firms to Work For. The first part of the survey involved evaluating each nominated company's workplace policies, practices, philosophy, systems and demographics. This part of the process was worth approximately 25 percent of the total evaluation. The second part consisted of an employee survey to measure the employee experience. This part of the process was worth approximately 75 percent of the total evaluation. The combined scores

determined the top firms and the final ranking. Best Companies Group managed the overall registration and survey process, analysed the data, and determined the final ranking.

WGA President and Managing Partner Joseph V. Giordano said, “We're honoured to win this award. We're often heard saying ‘We're not your ordinary accounting firm’, and we're proud of that. Our team approach is the key to our success. It's gratifying to see our employees across all levels feel positive and proud about working at Whisman Giordano. We encourage others in the accounting field to take a look at a career with us.”

“The firms on this list represent the best workplaces in the accounting profession,” said Accounting Today Editor-in-Chief Daniel Hood. “They are outstanding places to build a career.”

For more information on Accounting Today's Best Accounting Firms to Work For programme, visit [📄](#) Best Accounting Firms To Work For.

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Moritt Hock & Hamroff named top winner for best financial law firm

The law firm of Moritt Hock & Hamroff has been named a Top 3 Winner for Best Financial Law Firm for its financial services practice

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in the Long Island Business News 2022 Annual Reader Rankings List.

Long Island Business News reader rankings is an intensive months-long survey series that invites its readership to cast their votes for their favourite firms and businesses in dozens of B2B categories.

For over 40 years, the firm's Secured Lending & Finance Practice Group has earned a national reputation as a leader in representing members of the equipment leasing and finance industry, including asset-based lenders, finance and leasing companies, banks, and independent companies of



Marc L. Hamroff

varying size and specialty.

Moritt Hock & Hamroff LLP is an 80+ attorney commercial law firm providing a wide range of legal services to businesses, corporations, and individuals worldwide from its offices in New York City, Long Island, and Florida.

Attorneys Gabrielle J. Martone and Aaron D. Quinby join Moss & Barnett

Moss & Barnett, a professional association, is pleased to announce that attorneys **Gabrielle J. Martone** and **Aaron D. Quinby** have joined the firm.

Gabrielle J. Martone is a member of Moss & Barnett's business law and

real estate teams, assisting clients on a broad range of corporate, business, and financial matters. Martone received her JD, cum laude, from the University of St. Thomas School of Law and her BS, *with distinction*, in Economics and History from the

University of Wisconsin-Madison.

Aaron D. Quinby is a member of Moss & Barnett's real estate finance, real estate, and business law teams, focusing his practice on general real estate and commercial real estate

finance transactions. He represents clients through all stages of a transaction, including negotiating,

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structuring, and closing complex real estate transactions. Prior to joining Moss & Barnett and after graduating from law school, Quinby clerked for the Honorable Sheridan Hawley, chambered in Minnesota's Tenth Judicial District, and was in private practice in Minnesota and Texas, focusing his practice on real estate and business transactions. Quinby received his JD from the Mitchell Hamline School of Law, where he earned his Law and Business Certificate and served as editor of the *Mitchell Hamline Journal of Public Policy and Practice*, and his BA in Real Estate and Finance from the University of Northern Iowa.



Gabrielle J. Martone



Aaron D. Quinby

Hybrid Leadership

By ✉ **Raf Uzar**

The terms “leadership” and “leader” have almost become throw-away terms today with a whole plethora of professionals ready to offer advice on how to progress, improve, and develop in being a “leader”.

Yet times have changed and the demands on leaders are very different now from what they were some 30 to 40 months ago. Online and hybrid working is now part of the workplace environment and coping with this new demand – this new standard – is part of the leadership remit.

Understanding hybrid and knowing exactly why you want your business to implement it is the key to making it successful. Are you offering a remote work arrangement in order to pay lip service to the growing swarm of irritated employees demanding more flexibility or are you genuinely interested in providing staff with



Raf Uzar

the opportunity to mold and shape their working environment?

The dynamic between employer and employee is fundamental to planning for a labor market that has been tainted by “The Great Resignation” (or “The Big Quit”, if you prefer). Gallup research from 2021 suggests that 48% of working Americans are actively job-hunting; according to the Microsoft Work Trend Index for 2021 this figure is as high as 54% for Generation Z. Similar trends can be seen worldwide.

The Great Resignation tells us that employees are not adequately supported

and that employees crave more flexible working hours. We need to tackle both these needs to be successful leaders.

“In a recent survey 64% of employees at top companies said they would forgo a \$30,000 raise if it meant they didn't have to return to the office.” (Kalev & Dobbin, Harvard Business Review, Sept-Oct 2022)

Therefore, nurturing a workplace open to remote working must go hand-in-hand with supporting staff. The Chartered Institute for Personnel and Development (CIPD) in the UK points to seven strategies that can make hybrid working successful and also create an employee-support culture:

(1) Develop the skills and culture needed for open conversations about wellbeing:

- Upskill managers to discuss wellbeing confidently

...next page



- Create an organisational focus on wellbeing

(2) Encourage boundary-setting and routines to improve wellbeing and prevent overwork:

- Establish boundaries and routines – and monitor them across the team
- Take breaks between video calls
- Notice signs of overwork

(3) Ensure effective coordination of tasks and task-related communication:

- Set clear objectives
- Calibrate the frequency of task-related communication
- Develop more deliberate task-related communication

(4) Pay special attention to creativity, brainstorming and problem-solving tasks:

- Take time to explore the functionality of the technological solutions
- Identify which tasks are more effective face-to-face

(5) Build in time – including face-to-face time – for team cohesion and organisational belonging:

- Creating common purpose across the organisation
- Building personal and team relationships online
- Building in face-to-face time, post-pandemic
- Timetabling co-located working within teams

(6) Facilitate networking and inter-team relationships:

- Create opportunities for co-working with other teams
- Encourage inter-team relationships and networking at organisational level

(7) Organise a wider support network to compensate for the loss of informal learning:

- Recognise the points when learning needs are more intense
- Organise more structured development opportunities.

It is also practical to create “wellbeing champions” or “hybrid guardians” whose role it is to take responsibility for these strategies and help roll them out. However, a word of caution – deciding who works online, with whom, and for how many times a week needs to be preceded by a detailed review of the current status quo and what should follow next:

- (1) What do we wish to achieve through hybrid working?**
- (2) Where are we right now in the process?**
- (3) Which skills and tools are needed to facilitate the implementation of a hybrid workplace that is inclusive of online and offline employees?**
- (4) Who are the key stakeholders that will lead, influence, and implement the rollout?**

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(5) **What kind of data will help us monitor the effectiveness of hybrid working?**

(6) **When does implementation take place and how often does monitoring occur?**

Taking a ‘quick-fix’ approach and offering an abundance of new apps without walking through the above process will simply not work.

A conversation or questionnaire can help gauge the sentiments of staff but it can also be a useful tool in clarifying the legal implications of hybrid working, suggesting possible

policies and procedures, and sounding out plans and preparations. Keeping open the channels of communication between employer and employees is not only a wonderful opportunity to build trust but can be key to repairing any disconnect that has built up in recent months.

There is no best model for hybrid working and every organisation should adopt a system that seeks to support its own particular blend of personnel, tailoring hybrid to its own team’s needs. Some companies require a greater mix of online, some require greater monitoring, and not every team member is ever alike.

The challenges that leaders now face are often different. Recent research tells us that hybrid working done well leads to an increase in wellbeing, an improvement in inclusion, and an uptake in collaboration.

“Covid-19 provided the ultimate proof of the concept that firms can remain efficient while allowing employees more leeway in where and when they do their work: Even though millions switched to flexible and remote work arrangements during the pandemic, productivity didn’t decline.” (Kalev & Dobbin, Harvard Business Review, Sept-Oct 2022)

Maltese pension plans under the Malta/US Income Tax Treaty

By  Gregory Dean

Over the past decade, pension plans have been established and licensed in Malta with particular consideration given to US taxpayers. A number of these plans were designed to accept “rollovers” from foreign pensions plans owned by US persons – most notably from UK pension plans – combining the tax deferral benefits of a Qualifying Recognised Overseas Pension Scheme (QROPS) for UK tax purposes and the perceived US tax deferral benefits of a Malta pension.

The catalyst for these plans is the Malta/US Income Tax Treaty (effective in 2011) which addresses double tax and primary taxation rights of the two Contracting States. The



Gregory Dean

definition of a “pension fund” in this treaty is broader than in most other US treaties, simply stating that “the term ‘resident of a Contracting State’ includes ... a pension fund established in that State ... notwithstanding that all or part of its income or gains may be exempt from tax under the domestic law of that State”. It further provides that a pension fund established in Malta must be “a

licensed fund” which is “operated principally ... to administer or provide pension or retirement benefits”.

The Treaty adds that “Pensions and other similar remuneration beneficially owned by a resident of a Contracting State shall be taxable only in that State”, and states that “Notwithstanding ... the amount of any such pension or remuneration arising in a Contracting State that, when received, would be exempt from taxation in that State if the beneficial owner were a resident thereof shall be exempt from taxation in the Contracting State of which the beneficial owner is a resident”. This tax treatment is further confirmed in subsequent

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treaty articles. In short, these treaty articles provide two key points:

- A US taxpayer is not subject to US tax on income earned within a Maltese pension fund until it is distributed; and
- The receipt of a distribution, if tax-exempt to a resident of Malta, is also tax-exempt if distributed to a US taxpayer.

In terms of US tax law, investment-based pension plans are generally treated as grantor trusts – they are tax transparent, and the income, gains or losses within the plan are passed onto its owner. These plans require the filing of trust-related tax forms *Form 3520-A Annual Information Return of Foreign Trust With a U.S. Owner* and *Form 3520 Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts*. Some US taxpayers have then claimed treaty benefits exempting income and gains of their pension funds. To be effective, this exemption position must be disclosed by filing *Form 8833 Treaty-Based Return Position Disclosure* with their US individual income tax return.

On 01 July 2021, the IRS announced it would evaluate transactions involving Maltese pension plans to determine if the benefits claimed should be allowed under the Treaty. Then in December 2021, the competent authorities of Malta and the US entered into a competent authority arrangement (CAA) under the Treaty. This CAA states that US taxpayers



have been establishing “personal retirement schemes in Malta under the Retirement Pensions Act of 2011 with no limitation based on earnings from employment or self-employment and are making contributions to these schemes in forms other than cash”, leading to questions “about whether these personal retirement schemes are ‘pension funds’ for purposes of applying the Treaty”.

The CAA concluded that where a pension fund is allowed to accept contributions from a participant in a form other than cash or does not limit contributions by reference to earned income from personal services, such a fund is “not operated principally to administer or provide pension or retirement benefits within the meaning of paragraph 1(k) of Article 3 of the Treaty and is therefore not a ‘pension fund’ ”.

There has been significant commentary and criticism of the CAA, notably on administrative and constitutional law grounds, but that discussion is for another article.

On 01 July 2022, the IRS issued its “Dirty Dozen” tax scams for 2022, which included avoiding US tax by making contributions to certain foreign individual retirement arrangements in Malta, and improperly asserting the foreign arrangement is a “pension fund” for Treaty purposes, with the US taxpayer thereby misconstruing the relevant treaty to improperly claim an exemption from US income tax.

The IRS is now actively examining taxpayers who participate in Malta pension funds. Various examinations have been initiated, with information document requests issued, and it

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seems that any current treaty benefit claims will be denied if the return is audited. Past benefit claims will also likely be denied and may result in tax adjustments being assessed against taxpayers. Taxpayers should consider whether to take a Treaty-based return position for the 2021 tax year given the IRS announcements and issuance

of the CAA. It is also advisable to assess any past Treaty-based positions and disclosures to decide whether to proactively amend past returns or make arguments to the reasonableness of their position if examined.

The IRS has not provided any guidance on how a taxpayer who has

taken a Treaty position on a Malta pension might proceed, but the good news is that by definition Form 8833 is a disclosure of that position and that prior to the CAA, the Treaty position should be reasonable given the special status which was provided to Malta pension funds in the Treaty.

Dealing with legacy in mergers & acquisitions

By  Louis de Schorlemer

When queens and kings pass away, the faces of their heirs will rapidly show up on coins and stamps across the country. Such a transition is meticulously organised to allow the crowds to turn from mourning the deceased to celebrating the incumbent. In Mergers & Acquisitions, conveying a sense of continuity is much more challenging for the acquirer, who often lacks prior in-depth knowledge of the company culture and its propensity to embrace change. Early preparation of a step-by-step communication plan provides relief.

When a new owner looks at their acquired business, it is not easy to decide which items should stay and which should go. One of the early questions asked concerns the future role of founders or sellers – whom one is tempted to keep to help a friendly transition with customers and a proper handover of know-how. At the same time, increasingly diverging interests often result in an ultimate eviction of the seller. Across many civilisations throughout the world, the death of one's predecessor has often been the only way for a new leader to accede power and legitimacy. In business nowadays,



Louis de Schorlemer

the softer substitute is a symbolic golden handshake accompanied by positive media coverage.

For the large corporate buyer of a decent mid-sized, family-owned SME, his legacy was about a 35-year company history, a founding father, and his managing children. The business of over 200 employees was professionally run and successful, yet key positions were held by the siblings, and the family decided all critical matters. After completion of the sales transaction, the plan was for most family members to smoothly step down from their current roles.

In assessing the risks for business continuity and value capture, the buyer had identified an initial disconnect with some workers who would miss the company's paternalistic culture and sense of security, and there was resistance to

perceived administrative complexity and reduced decision power that were seen as critical elements to deal with for a successful integration. This early assessment of the company culture was based on input from the selling family and management and led to a detailed engagement plan.

Establish the new boss

The first move was to provide clarity to individuals regarding their role and future responsibilities within the organisation. This was complemented by sharing a high-level decision-making framework at inaugural post-merger workshops. In addition, the incoming leaders were presented on numerous occasions and their schedules included daily slots for informal and on-site encounters, such as lunch at the canteen or cake at the coffee machine, to engage the broader employee group for in-person meet and greets. While this sounds like common sense, many leaders tie themselves up in management meetings and neglect the need to be visible to all their staff.

...next page



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In this case, a real difference was made as leaders took the effort to be present at multiple locations over a period of several weeks, demonstrating authenticity and long-term commitment to the company and its employees. And both buyer and seller were equipped with exhaustive talking points to ensure their story was consistent and forward looking. Newly established monarchs will tour their countries with colourful parades and shake hands with the crowds to encourage loyalty and establish their leadership role.

History belongs in the museum

In their narrative, the new owners constantly referred to the decades of successful operations at the company, and warmly recognised

the founders. The first benefit was for both parties to shine, and be acknowledge for the success and growth of the organization. The second benefit was for the sellers to wrap up the transition period and constrain the collective memory around a few elements of relevance for future strategy.

The seller compiled a large photo album, gathering pictures from people and anecdotes that had been published about the company over four decades, before personally giving each employee a high-quality printed copy of the book at deal closing. Similarly, incumbent sovereigns may unveil a statue or inaugurate a new square carrying the name of their predecessor to help anchor the past. Speedy rebranding of companies contains the high risk of breaking the emotional bond of people with their former identity and loyalty to the company, and neglects finding an appropriate repository of history.

usually come with good intentions, agitated employees tend to have a limited time attention span and rapidly return to established habits. This happens even faster when expected results fall short. As a consequence, initial trust is withdrawn, and the new leader discredited. The wiser approach builds on existing communication channels and stretches change over a year-long period. Queens and kings stand on the same balconies as their ancestors and on their social media channels, they keep cutting ribbons.

Human brains connect the dots within fractions of a second and they very rapidly associate fresh and recorded information to make sense of a changing situation. Preparation for the selection of elements to keep and elements to drop is critical to support change in M&A. Thorough research will help identify the organisational symbols of a business that will make the difference for continuity. Because in the end, new rulers may wave at the crowds along the parade path, but it's only after they are gone that their legacy becomes history.

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Communication in M&A

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Keep the balcony

Many post-merger integrations introduce novel communication channels in companies and encourage different ways of interaction to promote change. While these initiatives

► Join DiplomaC, the podcast on mergers & acquisitions:

✉ [Apple podcast](#)

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Read the meeting summaries of Practice Group and Special Interest Group meetings which will be held at the GGI World Conference in Montréal in October.

AUDITING, REPORTING & COMPLIANCE (ARC)

Auditing, Reporting & Compliance (ARC) Practice Group Meeting
Friday, 21 October 2022 | 16:00-17:30
Chair: Prof Dr Michel De Wolf



Prof Dr Michel De Wolf

The Auditing, Reporting and Compliance PG meeting will deal with the latest developments in auditing. We will kick off with an insight into developments on the new set of audit reforms being discussed around the world, including a reinforcement of ethical standards, audit-only firms, etc. We will provide an overview of current trends in different continents as well as at the global level

(IESBA), with a special focus on some key countries.

As GGI member firms, we must be in a position to prepare ourselves for any strategic or operational move.

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BEST PRACTICES FOR PROFESSIONAL SERVICE ORGANISATIONS

Best Practices for Professional Service Organisations Practice Group Meeting
Saturday, 22 October 2022 | 09:30-11:00
Chairs: Timothy C. Lynch
 & Theodore A. Offit
Panellists: Aaron Bukowitz, Jamie Tong-Chow



Timothy C. Lynch



Theodore A. Offit

Diversity of thought elevates teams by fostering communication with individual perspectives, and creates an approach to thinking beyond yourself. DEI programmes are an essential aspect of building engaged and happy employees. Diverse organisations with strong DEI initiatives are more likely to have more engaged employees with increased job satisfaction and higher levels of trust. An important DEI trend today is Business Resource Groups (BRGs). BRGs are voluntary, employee-led groups that serve as resources for members and

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organisations by fostering diverse, inclusive workplaces aligned with organisational missions, values, goals, practices, and objectives. At this meeting a panel of GGI members will address the importance of DEI within their organisations and how they manage DEI opportunities and initiatives within their firms.



Aaron Bukowitz



Jamie Tong-Chow

BUSINESS DEVELOPMENT & MARKETING (BDM)

Business Development & Marketing (BDM) Practice Group Meeting

Friday, 21 October 2022 | 14:00-15:30

Chair: Jim Ries

Guest Speaker: Jocelyn Brumbaugh

Marketing 101 – How to Raise Your Firm's Profile and Use LinkedIn and Conferences to Develop New Business

Join Jocelyn Brumbaugh, founder of law firm marketing strategy consultancy Builden Partners, for a three-part, interactive session on marketing and business development with actionable takeaways attorneys and accountants can implement on the spot.

Jocelyn will teach attorneys and accountants the difference between



Jim Ries



Jocelyn Brumbaugh

marketing and business development and provide them with the tools to:

- 1) Raise their firm's profile by following easy steps;
- 2) Use LinkedIn to better position themselves and target prospects; and
- 3) Better leverage conferences to close the deal.

Part 1 will discuss Builden Partners' Five Step Marketing Infrastructure Model, the process-driven approach that allows firms to raise their profile and retention rates by fully leveraging the good work already taking place within their firm. Attorneys and accountants will work in groups to unpack their firm's current marketing strategy and brainstorm how to incorporate missing steps and best practices.

Part 2 will break down the elements of a standout LinkedIn profile and give tips on making meaningful connections, including how to use the platform to target high-

potential prospects. This portion will include real-time upgrades to individual profiles with prizes for the most improved profile.

Part 3 will explore how to fully leverage conference sponsorships at a firm level, as well as how to develop a targeted pre-, during, and post-conference plan to cultivate new business. Attendees will work in groups to create roadmaps for getting the most out of their next GGI conference.

Bring your laptop to fully participate – you cannot update your LinkedIn profile on your phone or tablet.

About our speaker

Jocelyn Brumbaugh is the founder of Builden Partners, a consulting firm that works with law firms exclusively on marketing strategy. She spent 20+ years in top marketing and communications roles at law firms Baker McKenzie and Foley & Lardner, and in financial services at the hedge fund Citadel.

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Jim Ries

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CORPORATE GOVERNANCE & COMPLIANCE

Corporate Governance & Compliance Special Interest Group
Saturday, 22 October 2022 | 11:30-13:00

Chairs:  Anthony J. Soukenik
 &  Dr Peter Wagesreiter
Speakers:  Paul Simmons,
 Jean Sébastien Lebrun,
 J. Lee Lloyd,  Jonathan B. Wilson



**Anthony J.
Soukenik**



**Dr Peter
Wagesreiter**

An all-star lineup will present on newly enacted global acts and laws of compliance that every professional must know in their everyday counselling, followed by a discussion of corporate governance for multi-generational family businesses, then will come full circle to learn how corporate social responsibility in your firm will engage and retain your employees.



Paul Simmons



**Jean Sébastien
Lebrun**

Jonathan B. Wilson (Taylor English Duma LLP, Atlanta, GA, USA): The Corporate Transparency Act (“CTA”) was adopted by Congress on 01 January 2021. The act has yet to go into effect. Once the filing requirements begin, this will impact an incredibly large number of entities in the US.



J. Lee Lloyd



**Jonathan B
Wilson**

Jean Sébastien Lebrun (Ravinsky, Ryan, Lemoine LLP, Montréal, QC, Canada): The Canadian Transparency Act.

Dr Peter Wagesreiter (HSP Rechtsanwälte GmbH, Vienna, Austria): The EU Transparency

Regime, which came into effect on 27 March 2021, impacts the disclosure of information submitted to EFSA, placing a wider range of materials in the public domain than ever before.

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J. Lee Lloyd (J. Lee Lloyd, LLC, Greensboro, NC, USA):
 Corporate Governance for Multi-Generational Family Businesses –
 Optimising Ownership Succession
 and Liquidity Strategies

This discussion will focus on instituting corporate governance policies for:

- a) Sustainably increasing the value of multi-generational family businesses; and
- b) Facilitating ownership succession and multi-generational shareholder liquidity preferences.

There will also be a discussion of early warning signs that the existing governance practices of family businesses may be failing to set up the next generations for success.

Previously in Limassol Cyprus, keynote speaker Richard Collins presented the pillars of Corporate Social Responsibility (CSR) and how ESG is integrated into these pillars in professional firms:

- 1) Social responsibility is an investment in the future sustainability and profitability for organizations. Ultimately it can be the determinant between success or failure.
- 2) Social responsibility is important to businesses because employees benefit from working in an inclusive environment and towards a valued social goal. This builds a strong company governance that positively impacts people and productivity.
- 3) Use a CSR strategy to protect and grow your biggest asset – your employees.
- 4) It is not just an investment in your business but in your staff helping to enrich the quality of their lives with value and purpose.
- 5) See a significant return in investment through improved reputation, an engaged and productive workforce, becoming an employer of choice, successful investment, tendering and ESG compliance.
- 6) CSR is about delivering value and purpose for the next generation.

Paul Simmons (Haines Watts, Heathrow, Berks, England, UK) will present an update on how Haines Watts has carried out a firm-wide survey and has commenced the application process towards CSR accreditation.

CORPORATE & TECH

**Corporate & Tech
Practice Group Meeting**
Friday, 21 October 2022 | 14:00-15:30
Chair: [📧](#) Ady Nordman
Speakers: [📧](#) Elisabeth Colson
& [📧](#) Dan Rothberg



Ady Nordman



Elisabeth Colson

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[📧](#) Ady Nordman
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Following our terrific Corporate & Tech PG session at the GGI North American Regional Conference in Washington, DC earlier this year, Ady Nordman will follow up on the recent trend of DAO (Decentralized Autonomous Organization). We will try to better understand DAO and look into how DAOs can introduce a new era in transforming the global corporate landscape from the “old” hierarchical



Dan Rothberg

organisations to “liquid” democratic and distributed organisations.

DEBT COLLECTION, RESTRUCTURING & INSOLVENCY (DCRI)

**Debt Collection,
Restructuring & Insolvency (DCRI)
Practice Group Meeting**
Saturday, 22 October 2022 | 09:30-11:00
Chairs: [✉ Leslie A. Berkoff](#)
& [✉ Mario Kapp](#)



Leslie A. Berkoff



Mario Kapp

Changes in Insolvency since the Pandemic

Leslie A. Berkoff will review changes in United States Insolvency Law arising from the Pandemic and any lasting impact since March 2020.

Mario Kapp will discuss “COVID-19 and the potential of mass insolvency in the European Union”. Nobel Prize-winning economist Joseph Stiglitz has expressed that current insolvency procedures are not tailored to mass insolvencies (“systemic bankruptcy”). Avoiding economic collapse as a result of the Corona crisis, he says, requires preserving as many companies as possible. To this end, he recommends the introduction of a “Super Chapter 11”.

Mario will look at this topic in detail, whereby the subsidy measures

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enacted to counter the consequences of the pandemic-related economic collapse as well as the (re-)design of insolvency regulations with regard to the COVID-19 pandemic (and its effects) will be presented in an

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European internal market comparison of selected member states.

Any PG members who would also like to present are welcome to contact Leslie or Mario directly.

GLOBAL MOBILITY SOLUTIONS

**Global Mobility Solutions (GMS)
Practice Group Meeting**
Saturday, 22 October 2022 | 09:30-11:00
Chair: [✉ Aasim Hirji](#)



Aasim Hirji

As the newly appointed Co-Regional Chair North America for the GGI Global Mobility Solutions Practice Group, Aasim Hirji (Moody's Private Client Law LLP, Calgary, AB, Canada) will be running this meeting and invites registered attendees to let him know if they are interested in presenting and on which specific country or region. 15 minutes

per presentation is available, and spaces will be allocated on a first-come-first-serve basis.

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GLOBAL POLITICAL ECONOMY & INTERNATIONAL RELATIONS – UNDERSTANDING THE INTERNATIONAL ECONOMIC ORDER

**Global Political Economy
& International Relations –
Understanding the International
Economic Order Special Interest Group
Meeting**
Thursday, 20 October 2022 | 14:00-16:30
Chair: [📧 Claudio G. Cocca](#)

Financial Climate Change – Is Inflation Here to Stay?

Hopes of a post-Covid economic recovery and easing of global supply chain disruptions have largely faded in the wake of rising inflation and the war in Ukraine. Sanctions levied against Russia, particularly in the energy sector, have caused inflation to soar since the beginning of the year. Although Russia and Ukraine make up a relatively minor proportion of the

global economy, they are nevertheless key suppliers in the areas of energy, raw materials, fertilisers, and agricultural products. Against the background of this multifaceted conflict situation, central banks face a dilemma: should they continue to increase interest rates in order to fight inflation, while at the same time run the risk of seeing heavily indebted countries unable to service their payment obligations, and see economies fall into recession? Or should they instead loosen the monetary policy reins and allow inflation to prop up the economy and financial markets?

These and other questions will be covered during the talk and Claudio is looking forward to taking part in some spirited discussions.



Claudio G. Cocca

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INDIRECT TAXES

Indirect Taxes Practice Group Meeting

Friday, 21 October 2022 | 14:00-15:30

Chairs: [Steve McCrindle](#)
& [Toon Hasselman](#)

At this meeting we will be looking at the following topics:

Canadian GST/HST – A high level look at international businesses doing business in Canada, including services and their typical costs. (Presented by a local IDTPG team member).

VAT & Customs in Wartime – “Off the wall” exploration of this subject from the perspective of (amongst other angles):

- How do basic tax regimes function in wartime, or maybe they don't?



Steve McCrindle



Toon Hasselman

- Are imported weapons subject to VAT & duty and customs formalities, or not? If they are, can they be impounded at the border subject to the payment of taxes and fulfilment of red-tape requirements?
- If you fire a rocket from one country and it lands in another, is this an export supply? If not, what is it? If it isn't a supply, how do you get an input tax deduction?

Non-Fungible Tokens (NFTs) – Blockchain based, and becoming a BIG area of work for Steve and Toon with big ticket fees. A high-level look at what they are and the VAT & duty implications. Hopefully, this will remove any mystique surrounding the subject.

We would be interested in finding out, before or during the session, how other jurisdictions treat NFTs and how they determine the VAT liability of their supply given that the location of customers is likely unknown and impossible to prove.







“Bread & Butter” – Look at a goods transaction chain, the VAT issue arising from it, and determine the answer to the issue, which may differ across jurisdictions.

Are you able to contribute by sharing your expertise on any of the above topics? If so, please contact either [Steve McCrindle](#) or [Toon Hasselman](#) directly.

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INTERNATIONAL TAXATION

International Taxation**Practice Group (ITPG) Meeting****Thursday, 23 June 2022, 14:00-16:30****Chair:**  Oliver Biernat**Speakers:**  Mohammed Aweidah,
 Ann Kidd,  Joseph Möed,
 Kim G. C. Moody,  Adam Morke,
 Niels Webersinn**Oliver Biernat****Mohammed
Aweidah**

Seven presenters, six topics, attendees from five continents, four tax topics, three goals (learn about taxes, get to know each other, and have fun), two non-tax topics, one country focus – Canada. This is what you can expect in a nutshell from our ITPG meeting in Montréal.

Global Chairperson Oliver Biernat (Benefitax GmbH, Frankfurt am Main, Germany) will provide in-depth information about what the ITPG has to offer now and in the future, and update experienced members on changes. He will also give first-time attendees and new regional ITPG chairs a chance to briefly introduce themselves.

**Ann Kidd****Joseph Möed****Kim G. C. Moody****Adam Morke**

Three Canadian tax experts will then talk about tax issues for foreign investors in the host country of this year's world conference. Kim G. C. Moody (Moody's Private Client LLP, Calgary and Edmonton, AB, Canada) and Adam Morke (Stern Cohen,

Toronto, ON, Canada) will present **A Road Map to Buying or Investing in Canada**, and explain why Canada is not the 51st state of the United States. Typical structures used for domestic purposes in the US or elsewhere in the world may not be ideal to facilitate investment in Canada. This session will explore common pitfalls, provincial considerations, and reporting disclosure requirements; and will also discuss optimal entity selection for how deals should be structured from a tax standpoint when international investors are considering investing in Canada.

This presentation will be followed by Joseph Möed (Kanish & Partners LLP, Chartered Professional Accountants, Toronto, ON, Canada) explaining the new rules for digital economy businesses. He will focus on the impact of these new

**Niels Webersinn**

rules for non-resident companies currently operating or contemplating starting operations in Canada.

Before we go on, a 15-minute coffee break will allow us to refresh our minds and meet old and new friends. After the break, there will be three more speakers.

Mohammed Aweidah (Al Zarooni Tureva, Dubai, UAE) will present challenges of the new corporate tax to be implemented in 2023 in the UAE.

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 **Oliver Biernat**

Global Chair of the ITPG

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A truly international topic and update from his presentation held in Cyprus at the European Regional Conference earlier this year will be presented by Niels Webersinn (nbs partners, Hamburg, Germany). He will discuss recent developments in global minimum taxation,

which affect most countries. Last but not least, we will have a marketing session for tax experts. Ann Kidd (Marketing Director at Mowery & Schoenfeld LLC, Chicago, IL, USA) will share with us how **Playing to Win: Selling Beyond Compliance** works well.

After this two-and-a-half-hour, high-intensity interval tax training session you should be fit for the rest of the conference, and you certainly will have at least a couple more friends.

LITIGATION & DISPUTE RESOLUTION (LDR)

**Litigation & Dispute Resolution (LDR)
Practice Group Meeting**
Saturday, 22 October 2022 | 09:30-11:00
Chair: [✉ Michiel Teekens](#)
Speaker: [✉ Jean Lemoine](#)

Jean Lemoine of host firm Ravinsky, Ryan, Lemoine LLP, has prepared an excellent presentation about a typical matter that has been seen countless times in all jurisdictions, but which also varies every time. The ingredients are: a bank, a commercial loan to a company, liquidation of the company, a personal guarantee to the bank by the shareholder of the company as security of the commercial loan, the duty of care, confidentiality, lawyer's responsibility and even, yes, ethics. The presentation will surely trigger discussions and comparisons with similar experiences



Michiel Teekens



Jean Lemoine

of the attending members in their own jurisdictions. Make sure you do not miss out and register!

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M&A

M&A Practice Group Meeting
Saturday, 22 October 2022 | 09:30-11:00
Chair:  Robert Thompson

During this meeting, there will be a quick update on plans and priorities for the PG, followed by a presentation on legal tech for M&A from a practical perspective of actual use, experience and client feedback. There will also be a panel interactive session involving a number of dealmakers and their views on what legal and accountancy advisers can




Robert Thompson

do to either facilitate or frustrate deal processes when working as part of the team. or frustrate deal processes when working as part of the team.

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REAL ESTATE

Real Estate Practice Group Meeting
Friday, 21 October 2022 | 14:00-15:30
Chair:  Paul Simmons

This meeting will be informative, thought provoking, and interesting. We will cover the following areas:

- Opportunities opening around the world in connection with the link between purchasing property and obtaining residency to live in the country.
- Winners and losers in the global real estate market.

During the last few meetings, we have been collating data on real estate values and returns in a number of countries represented by participants at the meeting. It is fascinating to see how these statistics change over time, and how we gain insight into different markets. We will update our data with

the latest information at the meeting, taking into account the effect of current global conflicts and issues.

There will then be time for attendees to share and discuss property investment opportunities. This will be a dynamic and engaging session where we can promote deals our clients have and which may be of interest to the clients of other attendees. It will be a win-win for our clients and enable attendees to work with each other after the meeting. There will be a short time allowed for attendees to present property investments – if you would like to do so, please contact Paul Simmons (pdsimmons@hwca.com).

Please come to the meeting and benefit from expert insights into the property market and find ways to help your clients and the clients of other attendees.








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TRUST & ESTATE PLANNING (TEP)

**Trust & Estate Planning
Practice Group Meeting**
Saturday, 22 October 2022 | 09:30-
11:00

Chair:  Harry Cendrowski
Speakers:  Prof Sergio
Guerrero Rosas,  Darlene Hart,
 Raúl Omar Lara Páez
 Kim G. C. Moody

Given the mobility of high-net-worth private clients, there is a great need for those in the trust and estate profession to be able to identify cross-border issues and to develop and maintain a network of colleagues with whom such issues can be properly addressed. Join our session to network and learn from some of the best minds in the global trust and estate planning field.

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Harry Cendrowski



**Prof Sergio
Guerrero Rosas**

Darlene Hart (USTAXFS, Zurich, Switzerland) will be discussing two separate topics:

- The Current Competent Authority Agreement between Malta and the US Government, regarding Maltese Pension Plans.
- The Current Efforts of the US Government's 'Dirty Dozen' list, which includes off shore trusts, with a focus on foreign pension trusts.



Darlene Hart

Raúl Lara (PRL & Asociados, Monterrey, Mexico) will look at "Preparing for the Uncertainly Certain: Steps to Protect your Client's Assets in Mexico before a Possible Inheritance Tax".



**Raúl Omar
Lara Páez**

Kim G. C. Moody (Moody's Private Client Law LLP, Calgary, Canada) will cover "Common Canadian Estate Planning Tools for High Net Worth Individuals and Non-Residents Holding Canadian Assets". During his presentation, he will explore common CDN trust vehicles and how non-residents with CDN beneficiaries and/or asset holdings



Kim G. C. Moody

might consider planning their affairs for efficient administration on death.

Remote, not distant: Design a company culture that will help you thrive in a hybrid workplace

By **Gustavo Razzetti**

Hybrid and remote work is here to stay. What will it take for your company to succeed in the new normal?

The pandemic taught many businesses a very valuable lesson – those who don't adapt will get left behind. Some businesses managed not only to survive but actually thrive in a remote and hybrid work model. What's their secret?

Gustavo Razzetti answers this question in **his practical, meticulously researched book, *Remote, Not Distant: Design a Company Culture That Will Help You Thrive in a Hybrid Workplace***. The author and consultant provides a roadmap to understand, adapt to, and succeed in a hybrid workplace. After spending years studying businesses, including Amazon, Slack, GitLab, Volvo, Microsoft, and other successful organisations, his solid grasp of the topic will challenge your perspective of hybrid and remote work.

Free bonuses: when you purchase this book, you gain access to dozens of exclusive, downloadable tools and templates to design your hybrid work culture.

Remote, Not Distant provides actionable tools for senior leaders, managers, team members, and consultants. Razzetti

addresses the multiple areas of culture, from keeping your team connected and improving remote collaboration to managing asynchronous communication, facilitating courageous conversations, and defining the right hybrid model for your organisation.

This book covers critical concepts including:

- What successful remote leaders do differently
- Five key mindset shifts to reset your workplace culture
- Why your office was never your culture
- Tips to building culture remotely
- Building psychological safety – one step at a time
- Six modes of collaboration for hybrid teams
- The future of work is here. Will you adapt or be left in the dust?

Title: **Remote, not distant: Design a company culture that will help you thrive in a hybrid workplace**

Author: Gustavo Razzetti

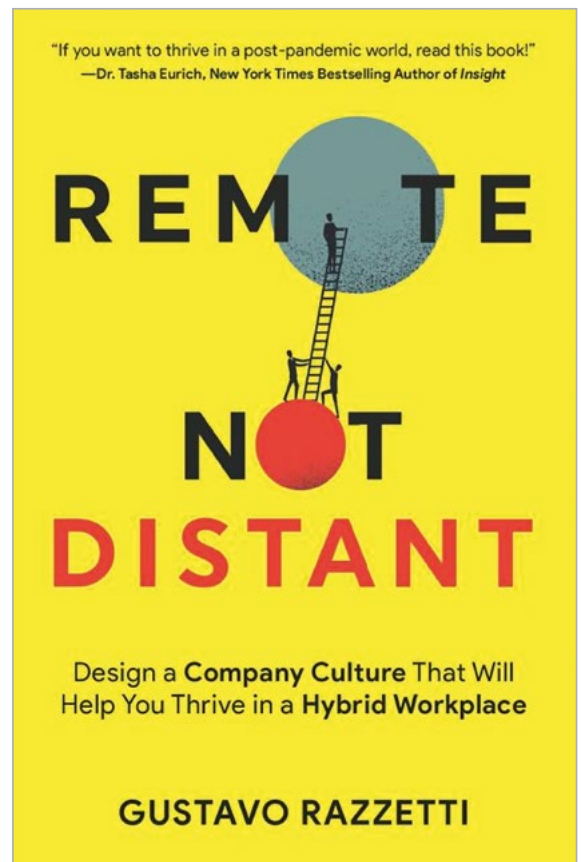
Publisher: Liberationist Press

Language: English

Hard Cover: 326 pages

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With actionable advice, this book offers you the insights and tools you need to succeed in a hybrid workplace.

Join Our Upcoming Events

- **GGI Latin American Regional Meeting**
Montréal, QC, Canada | 19-20 October 2022
- **GGI French-Speaking Chapter**
Montréal, QC, Canada | 19-20 October 2022
- **GGI World Conference**
Montréal, QC, Canada | 20-23 October 2022
- ***GCG Capital M&A Dealmakers Meeting***
Montréal, QC, Canada | 20-23 October 2022
- **GGI Asia-Pacific Regional Conference**
Bangkok, Thailand | 01-04 December 2022
- **GGI ITPG Global Tax Summit**
Nassau, The Bahamas | 18-19 January 2023
- **GGI NA Best Practices & Marketing Professionals Conference**
Nassau, The Bahamas | 19-21 January 2023
- **GGI Chairpersons Meeting**
Zurich, Switzerland | 03-05 February 2023 (TBC)
- **GGI Middle East & Africa Regional Conference**
Dubai, UAE | 10-12 February 2023 (TBC)



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