



The CPD Fest 2020

Revenue Audits & Interventions

Presenter:

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Revenue Interventions

(2020 & Beyond)



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Revenue Interventions:

- Revenue's Annual Report 2019 – Quick review of trends etc
- Topical Risk Areas– Construction, Close Companies, etc
- Covid 19 Reliefs – preview of the reviews to come
- Family Remuneration – Persistent problem but becoming permanent review point
- Employee Expenses – 2020 saw multiple eBriefs but still no solutions
- Contract of / for Services – Dominos' Decision and what next?
- Sundry issues – VAT, etc
- Summary / Q & A (Speakers Experience v Tax Law v Practice)

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3

Revenue's Annual Report 2019:

- 108 Pages – Information v Spin & PR – Difficult to read
 - Continued growth in data-access and reflected in Pre-Pop of Returns
 - Salaries , Social welfare etc
 - RCT, HRI, etc
 - RTB Tenancy Registrations, Housing Assistance Payments
 - Farmers EU Payments Scheme
 - Continued movement on 'Transparency ' and 'Anti-Avoidance'
 - DAC 6 coming on-stream in 2020, Transfer Pricing Rules, etc
 - See Tax Cases involving Trading Losses / BVI Scheme and CGT Loss / Bond Scheme
 - Compliance levels still very high
 - 98%+ for large and medium cases, 91%+ for the rest (compliance within 1 month of deadline)


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Revenue's Annual Report 2019 cont.....

- On-Line / eCommerce – very much on the agenda
 - Non-resident suppliers selling to Irish customers
 - 200 new VAT registrations in 2019 for non-Irish businesses
 - Credit Card Activity to be monitored – 2024 target for 'new regime'
- Change to HWI – High Wealth Individual
 - Original LCD split between Individuals and Corporates in last year's reorganisation
 - Originally HWI if > €50m in assets – so at start of 2019 only 200 individuals
 - Reduced to > €20m in assets – an additional 475 individuals
 - Additional criteria also used so may be more people added to the list



5

Revenue's Annual Report 2019 cont...:

- Aggressive approach to non-compliance continues
 - > 566,000 Compliance Interventions including 22,719 on 'PAYE tax-payers' (<5%)
 - 704 cases re. penalties for non-filing = €2.8m (€3,900 per case – 2018 averaged €3,800+)
 - 25,411 Suspicious Transaction Reports from Financial Institutions - €7.6m in Audit Yield
 - 24 Transfer Pricing Audits – led to >€26m of trading losses being restricted
 - Compliance Reviews - Sectors
 - Construction Sector – 2% of all interventions v 8% of total yield - ONGOING
 - Medical Locums – Expenses, Family Wages, VAT - ONGOING
 - 'BnB - Case I/ IV NOT Case V' – non-disclosure etc - ONGOING
 - Publicans – undisclosed wages, undisclosed sales - ONGOING



6

Revenue's Annual Report 2019 cont.....:

Table 11: Audit and Compliance Intervention Activity

Type of Intervention	Completed 2019	Yield €m	Completed 2018	Yield €m
Comprehensive Audits	1,628	103.7	2,696*	119.5
Multi Tax/Duty Audits	466	24.2	648	27.8
Single Tax/Duty/Issue/Transaction Audits	935	94.7	1,391	108.3
Total Audit Interventions	3,029	222.6	4,735	255.6
Aspect Query	77,442	288.4	83,266	278.5
Profile Interview	2,742	15.7	5,078	19.2
Appraisals (no further action)	84,983		96,704	
Assurance Checks	375,367	7.05	356,813	7.2
PAYE Checks	22,719	13.9	34,161	11.6
Total Non-Audit Investigations	563,253	325.05	576,022	316.5
Total Interventions	566,282	547.65	580,757	572.1

* Includes investigations counted as comprehensive audits



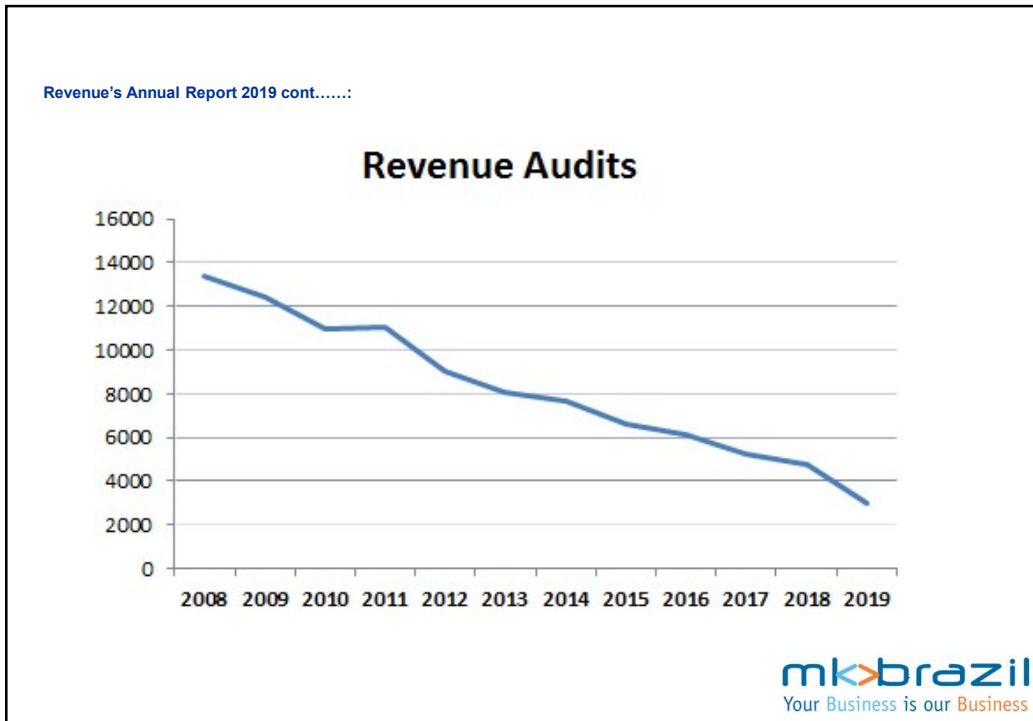
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Revenue's Annual Report 2019 cont....:

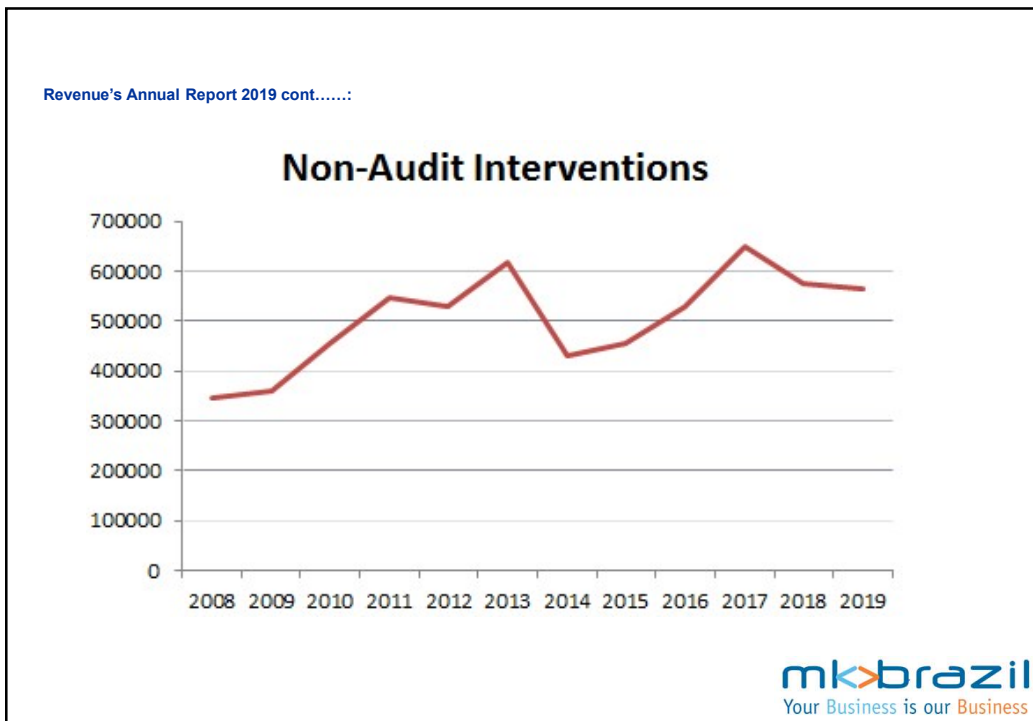
- Average Yield-per-Audit circa €73,500
 - Traditionally was consistently between €35k and €50k
 - 2018 average was €54k
 - New trend – less audits but higher yield?
- Random Audits – 70 completed, vast majority yielded €0 – total yield < €500
- Average Yield-per-Non-Audit Intervention circa €577
 - Consistent with previous years – usually between €500 and €1,000.
- Tax Avoidance Cases
 - Use of BVI Structure to create Trading Loss – 12 of 231 cases have settled for €1.8m (€150k per case)
 - Capital Losses Scheme – 9 of 28 cases settled for €36.4m (€4m per case)
 - Context – these cases could yield > €150k v €222m generated from 3,029 Audits



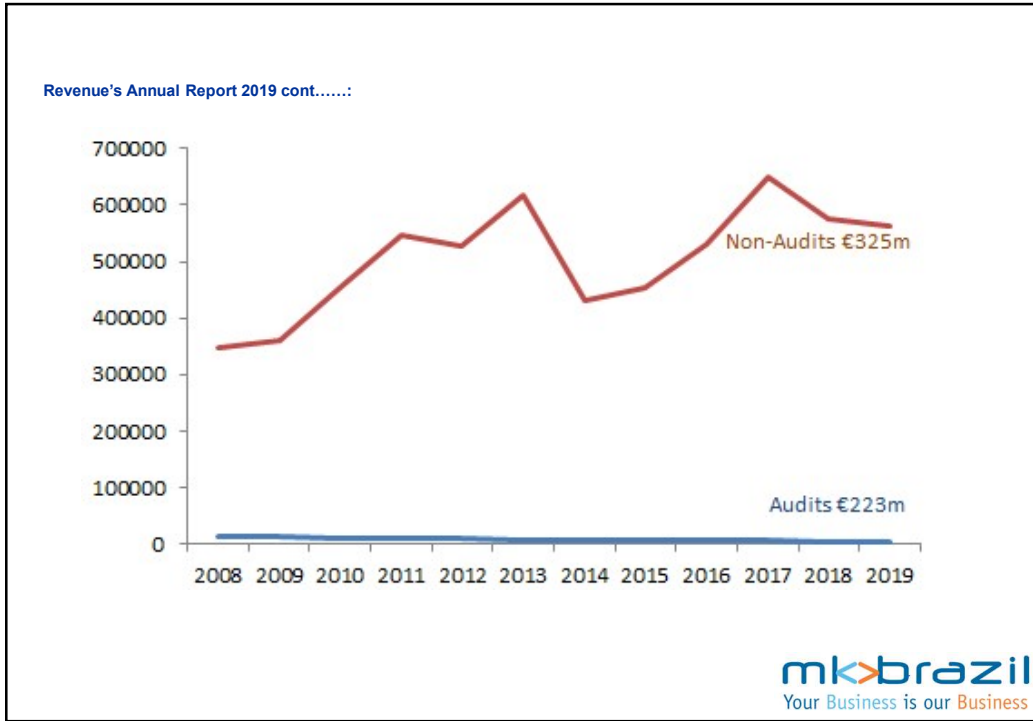
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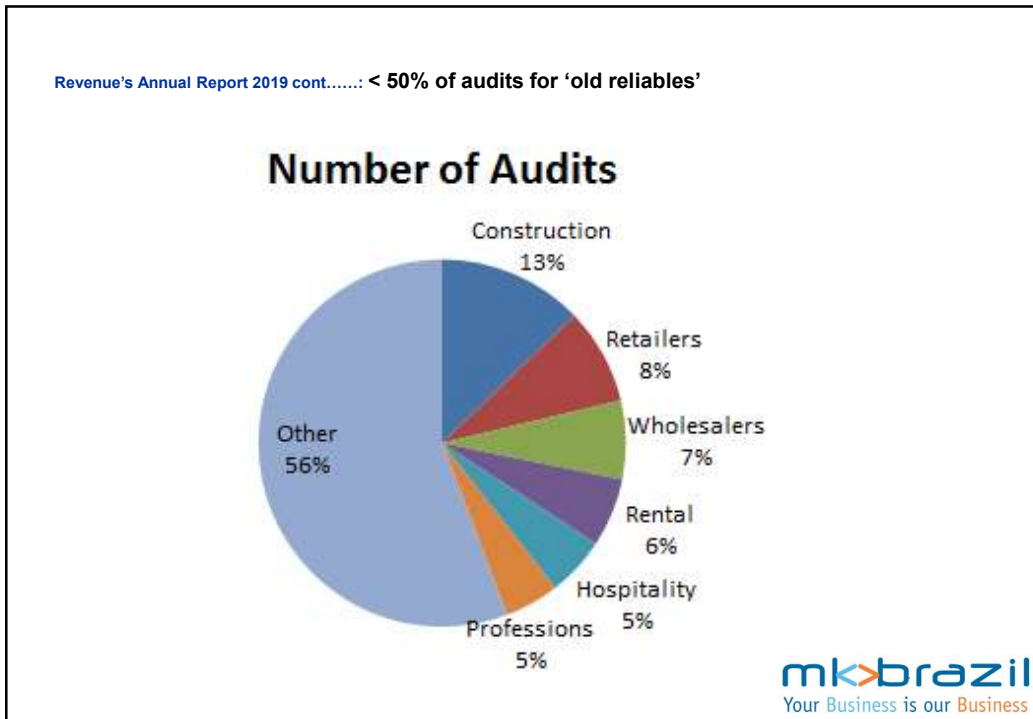
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10



11




12

Revenue's Annual Report 2019 cont.....:

- Average YpA €73,500 – How do 'old reliables' compare?


Number of Audits (& Investigations)		Yield per Audit	
Construction	388	Hospitality	€102,532
Retailers	256	Retailers	€100,000
Wholesalers	210	Rental	€75,410
Rental	183	Professions	€60,274
Hospitality	158	Construction	€38,402
Professions	146	Wholesalers	€31,429

Pubs YpA €209,375
 Food etc YpA €29,787


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Topical Issues / Possible Risk Areas



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Construction:

- Always under scrutiny
 - Site monitoring, Site Visits, Third-Party Data, RCT, HRI etc
 - RCT errors a persistent problem for all sides
 - Contractor v Employee a persistent problem area
 - Expense Regimes a persistent problem area



15

Hospitality:

- Publicans but also Hotels, Cafes, etc – Staff & Cash = Risk
 - Under-declaration of Sales
 - Lodgements v Sales
 - Missing Till Print-outs v Training Time etc
 - Stock Records v Margins – Spillage, Special Offers, etc
 - Cash Wages – self v family v staff
 - Often interlinked if trading via company – where did sales go?
 - Can have wider issues – DEASP, NERA etc
 - Remember obligation to keep proper records
 - Remember onus of Proof in Appeal rests with tax-payer



16

Medical Locums:

- Covered last year and Revenue action well-flagged
 - Mileage and other Expense claims (home costs)
 - Salaries to Spouses and other Family Members
 - VAT 21% (provision of Staff) v VAT Exempt (provision of Medical Care)
 - No change thus far in Revenue despite TAC case saying Exemption can apply
 - Circa 300 new cases in 2020 – Before Covid slowed down Compliance Monitoring?
 - See TDM 05-01-20



17

Landlords:

- Should not be on the list but has been for past few years
- Well-covered previously – no surprises
 - Under-declared rent
 - Estimated expenses / 'DIY' quantified / Home costs attributed to rent
- Remember – 'per-property A/C' must be prepared
- 'Short-term accommodation' – covered previously
 - Not Case V – usually Case IV – maybe – Case I
 - Under-declaration v vacant period costs v reduced by Rental Losses etc
 - Covid interrupted 2020 review but remote reviews on-going



18

Close Company Surcharges:

- Close Companies well covered previously but....
- Revenue clamping down on 'Professional' Service Companies
 - TAC Case re. Accountants could lead to even more activity
 - Non-professional activity may be 'professional' if it is part of 'larger offering'
 - Providing support to a Service Company also liable to Prof.CCS
- Not just Prof. CCS but also others
 - Persistent failure to address CCS on Rent, Interest, etc
 - Over-drawn Directors' Loans – S.239 AND BIK – often one overlooked
 - See also TAC case where S.434(3A) box not ticked in error!!!



19

Late Submissions:

- Covid has confused / delayed this but clamp-down coming
 - But – notice how all Covid Reliefs required eTCC to qualify!?!
 - Notice how reliefs were mainly about payment but very little relief for deadlines?!?!
- Late submissions cause problems for Revenue Systems
- Direct and Indirect Sanctions
 - Fixed Fines - €4,000 for RTDs etc
 - Late Submission Surcharges
 - Loss of 'Pay & File' deadline extensions
 - Restricted Loss Relief
 - Missed Elections (R & D, S.434(3A), back-dating Pension Payments etc)
 - RCT % Deductions
 - 4-year Rules



20

COVID 19 REVIEWS – COMING SOON



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Covid Reliefs - Reviews:

- There have been a variety of Covid 19 measures
 - Deadline Extensions – Tax and CRO
 - Various Wage and other subsidy schemes
 - Debt Warehousing – VAT/PAYE <> Income Tax
 - Accelerated Loss Relief claims / Early R & D claims
 - Residence provisions
 - eWorking measures - €3.20 flat rate v Employee claims, Broadband etc
 - Banking and Grants and Rates etc etc
- Mostly policed at source – eTCC requirement, already 'on payroll', etc
- Expect fun when the 'real reviews' commence

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Covid Reliefs – Reviews cont.....:

• **TWSS**

- Absolute mess from the start due to poorly worded guidance and legislation
 - Significantly disrupted so 'normal' wages can't be paid
 - Despite this – employee must 'make best efforts' to pay normal wages
 - Significant impact linked to 25% reduction in Turnover – compared to what??"
 - Multiple versions of FAQs and Guidance
- Reviews already started but multiple reviews may occur
- Employee eligibility – payroll in February etc
- €410 v actual claim in 'initial period'
- 70% of ARNWP v Caps v Tapering etc
- 25% Reduction in Q2 turnover v Q1 v 2019 v Projections etc
- Going Forward expect problem areas to centre on
 - (i) Original basis for believing 25% Reduction Test would be met**
 - (ii) When sign off happened v when it should have happened**
 - (iii) Cash Reserves /Profits v 'inability to pay' aspects**



23

Covid Reliefs – Reviews cont.....:

• **EWSS**

- Overlapped with TWSS in July but only Wage Scheme from September onwards
- Far simpler than TWSS in terms of rules and computations
- 30% Reduction Test
 - Turnover for 01/07/2020 to 31/12/2020 v Turnover 01/07/2019 v 31/12/20219
 - One test – 6 months v 6 months 'as a whole' – not 'per month'
 - Required to retain copy of original Projections showing basis of 30% Reduction
 - Required to retain proof that projections were reviewed 'last day of each month'
 - Obligated to de-register 1st day of next month following review
 - No clawback as long as original basis was 'valid'
 - Can sign back up if turnover falls again but **NO BACKDATING CLAIMS**
- Must be able to show decline linked to Covid 19
- Proprietary Directors & Family Members – **Only if on payroll pre-June 2020**



24

• Covid Reliefs – Reviews cont....: **EWSS cont....**

• Going forward expect reviews to focus on

- Original Projections and/or Monthly Reconciliation
 - First prove that these were done!
 - Validity of Projects – do they align with recent performance etc
 - Should sign-off have occurred v 1 x 6 month test?
- Basis of reduction linked to Covid 19 as opposed to other factors
- Manipulation of Turnover – deferring, State Aid payments, under-declaration
- Interaction with other group companies / business divisions
- Anomaly where working employee wages < Subsidy
(wages €160 = Subsidy €203, Wages €210 = Subsidy €250 – only occurred where wages < €250pw)



25

Covid Reliefs – Reviews cont....:

• **CRSS**

- Subsidy based on 2019 AWT (Average Weekly Turnover) v CRW (Covid Restriction Weeks)
- 10% for first €20k and 5% thereafter – Weekly Cap €5,000
- €5,000 cap on a 'per premise' basis
- Criteria
 - 75% Decline in Turnover (2020 CRW v 2019 AWT x CRW)
 - Directly impacted by Covid 19 Restrictions via limitation on Public Access
 - Customers = Public and Restricted Access = Fixed Business Premises
- NOTE – All or NOTHING
 - If 75% test failure – Full CRSS is clawed back even if legitimate expectation etc
- Still evolving so watch for updates - Expect future reviews to focus on
 - **Direct Impact v Indirect Impact** (Wholesalers, Professions)
 - **Customer-facing Premises** (Kiosks, Boats, Mobile Chippers)
 - **Turnover Reduction Test** (deferring, delaying, etc)



26

Covid Reliefs – Reviews cont....:

• **Filing Deadline – File & Pay v File & Warehouse**

- 31st October / 12th November - Moved to 10th December but still required to Pay & File
- Similar Extension for CAT Submissions
- ‘Customers must both pay and file through ROS’ – if only one of these then 31st October ..
- If 25% decline in 2020 income as compared to 2019 then
 - Customers can warehouse 2020 preliminary tax
 - 2019 still payable but at 3% late interest provided PPA agreed before 10th December
- Similar scheme will apply for 2020 submissions

- Still evolving so watch for updates - Expect future reviews to focus on
 - **25% reduction in income for 2020 v 2019**
(Retrospective Interest and Late Submission Surcharges)



27

Covid Reliefs – Reviews cont....:

• **Sundry Other**

- Accelerated Loss Claims – reasonable projections and NOT Round Sums
 - Obligation to revise if Loss was over-estimated
- Company Vehicles – if Employee has use – BIK as normal – if Pool then parked up?
- Residence – Force Majeure cases and proof of ‘intended departure’
- Many concessions linked to ‘disruptions caused by Covid’ – already seeing cases where ‘decline was in place anyway’ argument is being mooted.
- Covid19 lessons: **importance of internal systems and of keeping tax affairs in order**
(Business nearly excluded entirely because payroll submitted late etc)



28

Family Remuneration

Tax deductibility in remunerating family members
Part 04-06-23

Document reviewed November 2020

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Family Remuneration:

- Salaries to family members is a persistent issue in Revenue Audits
- No problem if “paid wholly & exclusively for trade purposes”
 - Must actually be paid
 - Must be solely for the purpose of the business and no other (conscious or sub-conscious!) reason
- In practice this leads to various problems
 - Salary figure recorded but not actually paid
 - Paid but to business owner’s bank account
 - Salary not ‘commensurate’ with level and/or nature of activities
(Despite technical position – Revenue tend to only query ‘excess’ amount)

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Family Remuneration cont.....:

- **Examples of issues in last 18 months:**
 - Wife paid €24k for 'light administration work' – Revenue argued MV would be €x per hour and duties should only be Y hours per week
 - Children paid €12k each for weekend work / School holidays despite one of them being in US for the summer and no change to existing office staff – Revenue argued 90% disallowed as work same in years before etc.
 - Wife paid €22k each year but salary only accrued and never paid as dealt with via Director's Loan Account – Revenue challenging deductibility
 - Husband normally paid nothing but then paid €44k for 2 years and significant Pension Contribution. He had worked elsewhere before this but no noticeable change in 'wife's business' – Revenue challenging motive.



31

Family Remuneration cont.....:

- **Disallow Excess v Assessing 'business owner' on same**
 - Should usually resist this when Directors involved
- **Wholly & Exclusively v Paid**
 - Neither as clear as Revenue believe especially if Directors involved
- **Employment Law**
 - Be wary of cases involving young children as could trigger legal issues – also for tax purposes 'illegal payments' are never allowable
- **Why get involved in technical complex arguments?**
 - Far easier to just improve internal position – e.g. pay to individual's own account, ensure their role matches their salary, etc



32

Employee Expenses - eBrief Warning



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Employee Expenses:

- Persistent problem area – no shortage of blame
- Poor implementation by Irish businesses
 - Country Money plus mileage and/or accommodation and/or ..
 - Poor Mileage records – wrong rates – non-qualifying journeys
 - Subsistence but criteria not met, actual costs covered by employer, etc
 - Directors – family meals and holidays, business entertainment, etc
- Concession v Legal v Inconsistent application
 - Review went nowhere – Even TAC seeking legislative changes
 - Opinions re. 'proper records' can vary widely

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Employee Expenses cont....:

- eBrief 3/20 – Professional Membership Fees – TDM 05-02-18
 - FA 2011 repealed S.118(5E) which allowed memberships ‘relevant to the business’
 - Not needed as already covered by ‘Wholly, exclusively & necessarily’ (?!?)
 - If ‘statutory requirement’ – fine, e.g. medical, legal, auditors
 - If not required but still necessary – fine, e.g. representative at Appeals
 - If ‘commercially necessary’ – maybe, e.g. needed for insurance
 - If ‘indispensable condition of employment’ – maybe, e.g. everyone in that role has same
 - Clamp down already – e.g. if Accountant AND Tax Advisor – only one allowed



35

Employee Expenses cont....:

- eBrief 4/20 – General Rules re. Employee Expenses TDM 05-02-20
 - References Case Law to explain ‘wholly, exclusively and necessarily’...
 - References – and gives examples – of possible problem areas
 - Dual-purpose, e.g. detour on a business journey voids the journey
 - Difference between part of duties and being put in position to perform duties
 - Necessary is defined by duties not by the employer – e.g. Golf club membership
 - Makes a distinction between CPD and actual Training – CPD merely enhances ability to perform duties but is not strictly necessary to perform the duties.
- Revenue’s Annual Report mentions 267 ITI Qualification in 2019!
- Covid-based PPE – necessary?



36

Employee Expenses cont....:

- eBrief 20/20 – Update of CPD portion of 05-02-20

- Same as before but added this in relation to CPD:

“In the circumstances where an employer pays or refunds the cost of continuing professional development which is wholly and exclusively for the purposes of the trade or profession, Revenue accepts that such payment or refund comes within the scope of their published practice. Courses relevant to the business of an employer are not regarded as a taxable benefit”

- No basis for the above other than ‘concession’
- Employee would not be allowed to reclaim the fee via his/her taxes
- Can’t Appeal a ‘concession’



37

Employee Expenses cont....:

- eBrief 54/20 – BIK – Cars during Covid

- If Employer took back vehicle during lock-down, no BIK
- If employee held vehicle BUT private use prohibited
 - No BIK but must retain proof – e.g. mileage readings
- If employee has car but business use is reduced due to Covid - BIK calculated using January mileage as base



38

Employee Expenses cont.....:

- Remember
 - As CPD issue shows – confusion still reigns
 - See Revenue comments about ‘fraud’ and ‘fines’ when ‘remuneration incorrectly labelled as tax-free expenses’
 - Remember – Re-grossing risk now as well.
 - *“ don’t know what you are doing – but I know that it is wrong”*

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Contract of Services / Contract for Services

**Pizza firm loses appeal over delivery
drivers' PAYE designation**

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Employee v Self-Employed:

- Always an 'area of focus' for Revenue
 - 2019 AR – JUI v Construction Sites - "97 sub-contractors... reclassified as employees"
- Domino's Pizza v Revenue
 - See 23TACD2018 'the Hot-Food Case'
 - High Court upheld TAC Decision in December 2019
 - Previously 'self-employed drivers' were held to be Employees
- Fundamental change to Irish approach?
 - Mutuality of Obligation – Umbrella Contract +

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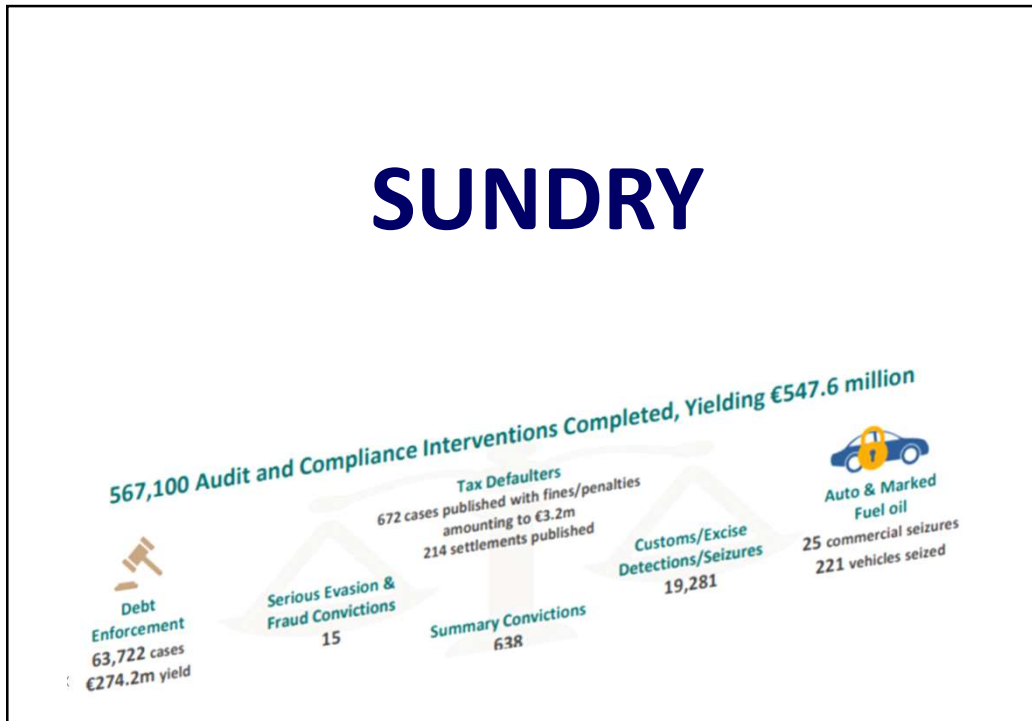
Employee v Self-Employed cont.....:

- Practitioners / Businesses need to consider all cases with 'on-going sub-contractors' ASAP.
 - Mutuality of Obligation – reality of the relationship and Dual-contracts
 - Substitutes – flow of invoices? Pre-approved Pool?
 - Nature of relationship – independent v integral part of main business?
- Usual considerations
 - Sole operator v staff / Business premises / Other Customers

(Remember – re-grossing risk now!)

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42



43

Chargeable Person – Directors / Late Submission Surcharges:

- All Directors are automatically ‘chargeable persons’ (s.959B)
 - Not just Proprietary Directors or share-owning Directors
 - Directors have different Surcharge risks as PAYE paid is ignored (S.1084(3))
- Exceptions can be made but only if ‘dormant’ company
 - Held no cash or assets or held < €130 of same
 - Had no activity
 - Did not pay ‘charges on income’
 - Met all of the above for **3 years**
- Revenue may accept non-proprietary Directors as not being chargeable if only have PAYE income



44

S.135(3A) – actual legislation

“Where a member of a company (being a close company within the meaning of section 430 and in this subsection referred to as the ‘first mentioned company’), or a person connected with that member, enters into arrangements directly or indirectly with another company (being a close company within the meaning of section 430 and in this subsection referred to as the ‘second-mentioned company’), whereby a member (in this subsection referred to as the ‘disposing member’), of the first-mentioned company disposes of an interest in shares or securities of the first-mentioned company and the consideration for the acquisition of those shares or securities is paid or to be paid directly or indirectly out of the assets of the first-mentioned company, any amount received directly or indirectly by the disposing member from the second-mentioned company in respect of the disposal shall be treated for the purposes of this Chapter as a distribution made by the first-mentioned company to that member at the time of the payment by the second-mentioned company, and this subsection shall apply however many companies participate in the arrangements”.



45

S.135 (3A) cont....

Judgement in 2019 Irish Supreme Case *Dunnes Stores v Revenue*

- “The words of the Constitution **import a guarantee** [of] the fundamental features of the rule of law. Among these features must be that **the meaning of a legal provision must**, insofar as is practicable, **be clear** and discernible, **so as to provide, not only to each person subject to that law, but also their advisers, the ability to regulate conduct in order to know whether that conduct is lawful.**
- Already causing problems in practice
 - Bank funding – cross guarantees etc
 - Future payments – still ‘out of assets of the company’
- Examples in Revenue Guidance? Not supported by legislation?



46

CGT Losses:

- Revenue raised concerns about ability to retain CGT Losses if not disclosed in annual Form 11 – TALC debate since 2018
- December 2019 - Revenue clarified their position
 - CGT Loss is not recognised until there is a gain for it to be offset against!
 - See eBrief 202/19 – T&DM Part 19-02-05 - para 5.1
- In practice this now means
 - 4-year rule for Revenue Reviews does not start until gain arises
 - Clients / Practitioners must retain documents / details of loss for years
 - Fiachra lost money on sale of Eircom shares in 2000, made gain on sale of AIB shares in 2020 – Revenue can review Eircom Loss in 2022!

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Retirement Relief – S.599 v S.598:

- S.599(7) - where
 - There is a (i) disposal of shares in a family company by a parent to a child and (ii) a disposal by the parent of shares in the company to a company controlled by the child
 - then the consideration shall be aggregated for S.598 purposes.
- Billed as anti-avoidance measure but very widely drafted
 - In 2010 Dad transferred 25% each to Son and Daughter
 - In 2020 plan is to buy-back Dad's shares so he can retire
 - Problem now?
- Watch this space!

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Sundry Other Matters:

- VAT on Property
 - Persistent problem area – Rental v clawback, Residential sales, ToB etc
 - VAT aspects must be considered as early as possible

- VAT – General
 - Imports from outside EU – SAD v Actual invoices?
 - Failure to adjust Inputs when Exempt Sales or non-allowable (Entertainment etc)
 - VAT Rate Review – Persistent Problem
 - Not just obvious risk areas like food
 - 2/3rd v Multiple v Composite
 - Till errors not checked – Reverse Charge errors – etc
 - Training, Medical, Educational, etc



49

Never Forget...

- Vast majority of problems in Revenue Reviews are avoidable
 - VAT Refunds – failure to check invoices
 - Expenses – poor records, double dipping, wrong rates, personal, etc
 - Basic Rules – Exempt Sales = No Inputs, Entertainment, Reliance on Estimates
 - Medical Expenses – OTCs, Dental, 'alternative medicines'
 - BIKs – Loans, Car v Van, etc

- €511m from 80,000 'audits & aspect queries'
 - Revenue attitude and technical complexities certainly factors – but clients and Practitioners need to consider what can be done to mitigate risks



50

SUMMARY / Q & A



51

SUMMARY:

- Proper Records – CGT Losses, TAC decisions, Covid 19 criteria etc
- Covid 19 – Expect trouble when panic over – put the work in now
- Family Businesses – Directors drawings, wages to kids, missing FC bulwark
- Employee v Self-Employed – The fun starts now
- Employee Expenses – Getting worse every year – Flat Rate review to come
- S. 135(3A) – *FUBAR* from the start and not getting better – RR / ER also
- Advisors – Protect clients v Protect yourself?

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Thank you for your attention

QUESTIONS?

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54