

TPMinds Americas

Main Summit: February 18 - 19, 2025
Pillar 2 Summit Day: February 17, 2025
Conrad Fort Lauderdale, Florida, USA

THE FLAGSHIP INDEPENDENT FORUM FOR TRANSFER PRICING PROFESSIONALS IN THE U.S. NOW WITH EVEN MORE UNMISSABLE CONTENT

Understand the direction of international tax policy reform, benchmark your TP strategies, identify new risk areas and mitigate controversy.

Inspiration

70+ Speakers

30+ Presentations & Panels

Networking

250+ Attendees

20+ Industries Represented



Suresh Nagpal
AMERICAN EXPRESS



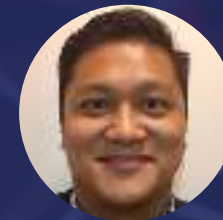
Christine Moyer
STARBUCKS



Brandon de la Houssaye
WALMART



Sarah Tat
MANULIFE



Ryan Rubianes
EXPEDIA



Nicole Robinson
NEC CORPORATION
OF AMERICA

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TP Minds Series
#TPAmericas25

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EVENT SCHEDULE

Main Summit: February 18 - 19, 2025

Pillar 2 Summit Day: February 17, 2025

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TP MINDS AMERICAS 2025 PROGRAM AT A GLANCE

TUESDAY, FEBRUARY 17 PILLAR 2 SUMMIT DAY

New for 2025, our Pillar 2 Summit Day is the one-stop shop to help you adequately prepare for Pillar 2 and provide an in-depth understanding of GloBE Rules reporting & compliance, its complex interactions with several aspects of tax and accounting, as well the data and technology challenges involved in operational implementation. This one-day summit, part of TP Minds Americas, was designed to fully prepare you for Pillar 2 implementation. Please note this event consistently sells out weeks before its due date at other TP Minds events across the globe, so make sure you register today as places are limited.

Big Themes

- Recap of the Full Scope of GloBE Reporting & Compliance Requirements
- Current Status of Implementation Across Major Economies & Low Tax Jurisdictions
- Transfer Pricing Aspects of Pillar 2
- Interaction of Pillar 2 and U.S. Tax Rules
- Operational Implementation – Addressing Data & Technology Challenges

Key Speakers

Andrew Ng, MARRIOTT VACATIONS
Olga Anufrieva, SOFT SERV
Laurie Dicker, BDO USA
Larry LeBlanc, RSM USA
Harmen van Dam, LOYENS & LOEFF
Chinyere Okechukwu, SCIENTIFIC GAMES

WEDNESDAY, FEBRUARY 18 MAIN SUMMIT, DAY 1

The first day of TP Minds Americas will be a fast-paced, action-packed affair, covering all key international tax & TP policy developments, not least at OECD, and UN level. You will listen to key policy makers and corporate speakers as they dissect and debate the hottest trends and challenges facing TP professionals at a time of unprecedented change, evolution and reform. This is also your chance to understand how GenAI and machine learning are being used by tax departments, as well as tax administrations, to optimise processes and what the implications of these key disruptors will be for our industry.

Big Themes

- OECD Keynote Speech
- Latest on Amount B
- Pillar 2 from the Trenches
- Latest Developments in Business Structures
- Operational TP Developments
- AI & the Taxpayer/Tax Authority Relationship

Key Speakers

Mayra Lucas, OECD
Ilka Ritter, UNITED NATIONS
Jan-Paul Vestering, NESTLE
Mar Hauessler, NOVARTIS
Brandon de la Houssaye, WALMART
Dan Teigen, MEDTRONIC
Lionel Nobre, DELL

THURSDAY, FEBRUARY 19 MAIN SUMMIT, DAY 2

The second day of the summit will start with a breakfast briefing covering TP developments around the globe, followed seamlessly by an industry panel exploring the current Audits landscape for corporates. During the day, you will also gain a 360° perspective on the kinds of TP disputes you will be seeing more of in the Tax Courts, what corporates can do to manage controversies effectively, and how to mitigate risk by making the most of APAs and MAP. Other key topics include valuation of intangibles, the future of profit splits, challenges with financial transactions, and much more besides.

Big Themes

- Rethinking TP Audits in the Age of Transparency
- Managing Risk Through APAs and MAPs
- Bilateral APAs: The Experience Between the United States and Italy
- Global Transfer Pricing Controversy
- IP Valuations & Exit Charges
- TP Challenges with Financial Transactions
- The Future of Global Profit Splits

Key Speakers

Monalissa Caircross, IRS
Ryan Rubianes, EXPEDIA
Christina Moyer, STARBUCKS
Elizabeth Weiler, ZOOM
James Dougherty, NEWELL BRANDS
Rodrigo Almeida, NISSAN
Himanshu Mishra, UPS
TJ Michaelson, VISA

MEET 70+ TP LEADERS, ADVISERS & POLICY MAKERS



Mayra Lucas
Senior Transfer Pricing Advisor
OECD



Monalissa Cairncross
Assistant Director – Group A; APMA Program
IRS



Suresh Nagpal
Vice President - International Tax
AMERICAN EXPRESS



Elizabeth Weiler
Corporate Tax Lead
ZOOM



Fanny Delaunay
Transfer Pricing Director
VERALTO



James Dougherty
Transfer Pricing Director
NEWELL BRANDS



Margaretha Haeussler
Executive Director, Transfer Pricing
NOVARTIS



Alfredo Collosa
Head of Division
**FEDERAL ADMINISTRATION OF PUBLIC
REVENUE ARGENTINA (AFIP)**



Nathan Hubbard
Senior Transfer Pricing Manager
ASML



Rodrigo Almeida
Head of Tax Americas
NISSAN MOTOR CORPORATION



Lionel Nobre
VP, Latin America Tax
DELL



Robert Andrade
Director, Transfer Pricing
HOLOGIC



Patrick Dervin
Sr. Director - Global Transfer Pricing
AON



Nicole Robinson
Head of Tax Policy Control
NEC CORPORATION OF AMERICA



Ryan Rubianes
Transfer Pricing Director
EXPEDIA



Katrina Welch
Vice President - Tax
SOLERA, INC.



Andrew Ng
VP of Global Tax
MARRIOTT VACATIONS WORLDWIDE



Daniel Berger
Head of Tax Insurance
LOCKTON



Inigo Arechabaleta
Transfer Pricing Manager and Product Owner
ZANDERS



Jon Morton
Principal
FORVIS MAZARS



Larry LeBlanc
Partner, International Tax Services
RSM



Margaret Alexander
Senior Director, Industry Practice Lead
MOODY'S



Mischa van der Kamp
Transfer Pricing Principal
BDO USA



Patrick McColgan
Principal, Transfer Pricing
BDO USA

MEET 70+ TP LEADERS, ADVISERS & POLICY MAKERS



Paul Sutton
Partner
LCN



Pravin Ugalat
Principal - Transfer Pricing
BDO USA



Ilka Ritter
Economic Affairs Officer
UNITED NATIONS



Simone Zucchetti
Partner
TREMONTI, ROMAGNOLI PICCARDI E ASSOCIATI



Anna Soubbotina
Principal - Transfer Pricing
CHARLES RIVER ASSOCIATES



Rodrigo Fernandez
Principal, Transfer Pricing
RYAN



Christine Moyer
Sr Manager, Global Transfer Pricing
STARBUCKS



Brandon de la Houssaye
Vice President, Tax
WALMART



Dan Teigen
Global Transfer Pricing Senior Manager
MEDTRONIC



Himanshu Mishra
Country Head, International Tax and Transfer Pricing
UPS



Jan-Paul Vestering
Head of Tax Zones North America & Latin America
NESTLÉ



Joao Braga Ribeiro
Tax Director (Controversy, TP & Special Projects)
SAMSUNG ELECTRONICS



Chinyere Okechukwu
Director, International Tax
SCIENTIFIC GAMES



Olga Anufrieva
Tax Director
SOFT SERVE INC



Sarah Tat
AVP Transfer Pricing and International
MANULIFE



Silvia McClellan
International Tax Manager - Transfer Pricing
LUBRIZOL



Shannon Janis
Vice President, Global Tax
ONSEMI



Scott Campbell
Sr Tax Manager of Global Tax Strategy and Transfer Pricing
FOSSIL GROUP



TJ Michaelson
Senior Director – Global Transfer Pricing
VISA



Linda Mao
Head of Global Transfer Pricing
UNIVAR



Sirous Amiri
Sr Manager, Transfer Pricing
LIBERTY LATIN AMERICA



Barb Derus
US Transfer Pricing Leader & Global Lead, Value Chain Practice
BDO USA



Dave Kautter
Advisory Tax Services Leader
RSM



Jan-Willem Kunen
Tax Advisor
LOYENS & LOEFF

MEET 70+ TP LEADERS, ADVISERS & POLICY MAKERS



Kirsten Burmester
Member
CAPLIN & DRYSDALE



Laurie Dicker
Transfer Pricing National Technical Leader
BDO USA



Mark Schuette
Global Transfer Pricing Leader
BDO USA



Neha Shah
Director- Global head of Tax/TP, Product Strategy
MOODY'S



Paul Daly
Tax Partner – Head of Transfer Pricing
BDO UK



Perry Urken
Partner
RYAN



Rachael Atkins
Senior Manager
RSM CANADA



Scott Klein
Principal, International Tax Services
BDO USA



Zara Ritchie
Partner and National Leader – Transfer Pricing Services
BDO AUSTRALIA



Joan Hortala
Partner, Transfer Pricing and Tax Governance
CUATRECASAS



Harmen van Dam
Partner
LOYENS & LOEFF



Samiksha Adukia
Transfer Pricing Manager
VEOLIA



Cory Hillier
Counsel Tax Law
IMF



David Farhat
Partner, Tax
SKADDEN



Eman Cuyler
Associate, Tax
SKADDEN



Matt Williams
Principal; EMEA Tax Desk Leader
BDO



Fernando Pliego
Partner & National Head of Transfer Pricing Practice
GRANT THORNTON (MEXICO)



Samit Shah
Principal, Transfer Pricing Practice
GRANT THORNTON (USA)









Peter Kurjanowicz
Partner, Transfer Pricing
GRANT THORNTON (CANADA)


















Alexandra Trotta
Head of OTP Consulting - US
EXA AG










DAY 1 | FEBRUARY 18, 2025

8:15	Registration & Coffee	
8:30	Chair's Opening Remarks	
8:35	<p>Breakfast Briefing - How to Integrate DEMPE Analysis with Legal Rights in Intangibles</p> <p>Transactions involving intangibles are often regarded as carrying a high risk of tax challenge. Yet DEMPE analysis is often superficial and confused, and many MNEs fail to design and implement transactions which are commercially rational and make sense legally. The result is that the MNEs are exposed to unnecessary TP risks, and their ability to protect and enforce IP rights is compromised. This briefing will explain common misconceptions regarding DEMPE, and will provide attendees with a practical overview of the sequence of steps needed to design transactions which have legal substance.</p>	 <p>Paul Sutton Partner LCN</p>
9:05	OECD In-Person Keynote Speech	 <p>Mayra Lucas Senior Transfer Pricing Advisor OECD</p>
9:25	<p>Global TP Policy Developments - Policy Makers' Outlook for 2026 & Beyond</p> <p>In keeping with previous stagings of our opening panel session, dedicated to the discussion and analysis of the most salient TP policy developments around the globe, we have once again assembled a distinguished group of officials to share critical insights on ongoing policies as well as future ones in the works. Following on from Mayra Lucas' keynote, the panel will pick up on some of the themes raised in her opening speech, not least with reference to the OECD work on the Pillars. Delegates will also hear about the current work of the U.N. and its role in establishing a framework convention on international tax cooperation, that will help shape tax reform globally in the coming years.</p>	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  <p>Mayra Lucas Senior Transfer Pricing Advisor OECD</p> </div> <div style="width: 45%;">  <p>Ilka Ritter Economic Affairs Officer UNITED NATIONS</p> </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%;">  <p>Dave Kautter Advisory Tax Services Leader RSM</p> </div> <div style="width: 45%;">  <p>Cory Hillier Counsel Tax Law IMF</p> </div> </div>
10:20	Networking Break	
10:40	Understanding Tax Administrations' Position on Current TP Developments	

" Great to have a transfer pricing focused event and to network with others who really know TP and work in the field. The panels were all relevant and interesting and on current topics."

Previous Attendee, **Wesco**

11:30	<p>Pillar 2 Preparedness: Gripping the Pain Points Ahead of 2026 Filing</p> <p>Pillar 2 is one of the most significant changes to the international tax landscape in decades. A global minimum tax of 15% and introduction of tax accounting concepts into tax law for the purposes of considering effective tax rates represents a fundamental shift in the way businesses are taxed. The additional global compliance and reporting obligations are significant, placing increased demands for data, on finance teams and IT systems. Many countries have now adopted Pillar 2 into domestic legislation, with the multinational and domestic top up tax rules already in effect. This pane, assembling Pillar 2 Leads in their organizations, I will discuss practical suggestions on how to approach Pillar 2 and successfully address key “pain points” ahead of filling deadlines.</p>	 Nicole Robinson Head of Tax Policy Control NEC CORPORATION OF AMERICA  Silvia McClellan International Tax Manager - Transfer Pricing LUBRIZOL  Sirous Amiri Sr Manager, Transfer Pricing LIBERTY LATIN AMERICA  Matt Williams Principal; EMEA Tax Desk Leader BDO  Moderator: Eman Cuyler Associate, Tax SKADDEN
12:20	Networking Lunch	
1:20	<p>Amount B/Simplified and Streamlined Approach – Global Roundup & Status Update</p> <p>The OECD’s report on Amount B of Pillar One does not yet provide the certainty companies and countries seek for approaching the transfer pricing of baseline wholesale marketing and distribution activities. Considerable effort has been invested in developing the Amount B framework. If implemented in a manner that does not compromise the arm’s length principle it is likely to be well received by both taxpayers and tax administrations. The report has however created too many forks in the road for tax administrations to choose from, ranging from whether to adopt or reject the guidance, to introducing a more qualitative scoping criterion. In the short term more taxpayer and tax administration resources may be required to wade through the Amount B requirements and result in an unwanted spike of disputes. The panel will discuss the Amount B report, whether the goal of introducing a simplified and streamlined approach has been achieved and the wider implications of the proposed framework.</p>	 Mayra Lucas Senior Transfer Pricing Advisor OECD  Perry Urken Partner RYAN  Margaretha Haeussler Executive Director, Transfer Pricing NOVARTIS
2:10	<p>Latest Developments in Business Structures – Challenges and Opportunities</p> <p>Led by Barb Derus, US Transfer Pricing Leader & Global Lead, Value Chain Practice at BDO USA, this panel discussion will focus on trends in global tax planning and structuring within the current tax reform environment, with particular reference to: Pillar 2 impact to global planning; Latest developments and trends with supply chain; Thoughts on certain local country tax reform initiatives and their impact to structuring; and how current M&A trends are impacting global expansion.</p>	 Katrina Welch Vice President - Tax SOLERA, INC.  Jan-Paul Vestering Head of Tax Zones North America & Latin America NESTLÉ  Moderator: Barb Derus US Transfer Pricing Leader & Global Lead, Value Chain Practice BDO USA
3:00	<p>Uncovering the New TP Risk Landscape and Addressing Key Challenges</p>	 Joao Braga Ribeiro Tax Director (Controversy, TP & Special Projects) SAMSUNG ELECTRONICS  Daniel Berger Head of Tax Insurance LOCKTON  Olga Anufrieva Tax Director SOFT SERVE INC  Margaret Alexander Senior Director, Industry Practice Lead MOODY’S

3:50	Networking Break	
4:10	<p>Operational TP & Managing Multiple Reporting Requirements</p> <p>Companies with complex global supply chains are facing an increasingly challenging regulatory environment that puts significant pressure on tax departments to deliver simultaneously on risk management, proliferating global reporting requirements, and changing in tax/transfer pricing regulations all whilst playing an increasingly strategic role for their organizations. Our panel will explore best practices and ideas for tax functions that are looking to allocate their resources to respond successfully to this rapidly evolving global tax and transfer pricing landscape including assessing technology available to assist with the transfer pricing function. Specific areas of discussion will include Data management, Transfer Pricing Automation and Implementation, Global Documentation strategies, CbC reporting/Pillar 2, and analytical tools for strategic planning. The panel will also explore best practices and lessons learned from integration with Finance and Operations and how to overcome challenges with this key area of cross-functional collaboration.</p>	 Sarah Tat AVP Transfer Pricing and International MANULIFE  Dan Teigen Global Transfer Pricing Senior Manager MEDTRONIC  Pravin Ugalat Principal - Transfer Pricing BDO USA  Alexandra Trotta Head of OTP Consulting - US EXA AG  Linda Mao Head of Global Transfer Pricing UNIVAR
5:00	<p>AI and the Reshaping of the Taxpayer/Tax Authority Relationship</p> <p>This panel brings together large taxpayers, tax Authorities and specialist advisors to shed light on how will AI is currently being used and how it might further be deployed by Revenue authorities in the future. Will it result in the emergence of fairer tax systems for both fiscs and multinational taxpayers? This session will explore the scope of AI in transfer pricing, discuss potential abuse and protection mechanisms, and how Artificial Intelligence can be used to foster fairer taxation frameworks globally, as well as greater cooperation between Taxpayers and Tax Administrations.</p>	 Brandon de la Houssaye Vice President, Tax WALMART  Lionel Nobre VP, Latin America Tax DELL  Alfredo Collosa Head of Division FEDERAL ADMINISTRATION OF PUBLIC REVENUE ARGENTINA (AFIP)  Neha Shah Director- Global head of Tax/TP, Product Strategy MOODY'S
5:50	Chair's Closing Remarks	
5:55	Networking Drinks Reception	













" The best transfer pricing conference that is available. It is a great conference that is applicable to direct practitioners. You get to hear "real" advice from those who are doing the work/dealing with the issues. Also, the networking opportunities are great! "














Previous Attendee, **Novartis**










" Very good panelists and participants. Sessions were very up to date and provided a lot of value added to any transfer pricing professionals. "

Previous Attendee, **Haliburton**

DAY 2 | FEBRUARY 19, 2025

8:15	Registration & Coffee	
8:30	Chair's Opening Remarks	
8:35	Breakfast Briefing - Global Transfer Pricing Developments	 Patrick McColgan Principal, Transfer Pricing BDO USA  Paul Daly Tax Partner- Head of Transfer Pricing BDO UK  Zara Ritchie Partner and National Leader – Transfer Pricing Services BDO AUSTRALIA
9:15	Rethinking TP Audits in the Age of Transparency & Co-operative Compliance Globally, tax authorities have intensified their tax audits. There is a growing trend towards forensic, whole value-chain focused, 'show-not-tell' audits and an increasing exchange of information driven by programmes such as the OECD's International Compliance Assurance Programme. Against this backdrop, taxpayers should ensure they have a robust and strategic approach to managing their tax risks and responding to challenges. This panel will explore how that can be achieved through the management of audits, including: proactive measures to ensure audit readiness; the importance of co-operative working with tax authorities; strategies to stop information requests ballooning out of control; preparation for providing greater contextual information and levels of detail; and ensuring a structured approach to dialogue and negotiation.	 Robert Andrade Director, Transfer Pricing HOLOGIC  Christine Moyer Sr Manager, Global Transfer Pricing STARBUCKS  Shannon Janis Vice President, Global Tax ONSEMI  Scott Campbell Sr Tax Manager of Global Tax Strategy and Transfer Pricing FOSSIL GROUP  Moderator: Jon Morton Principal FORVIS MAZARS
10:05	The Future of Global Profit Splits The use of the Comparable Profits Method / Transactional Profit Split Method has become more prevalent in recent years – not just as a 'last resort' for the testing of outcomes, but as a set of transactions designed and implemented on a forward-looking basis. In order for such structures to be robust, legal form and economic substance need to be aligned in a way which meets the needs of wider, non-TP stakeholders. This panel will discuss practical consideration for designing, maintaining and defending profits splits, based on the panellists' practical experience.	 Ryan Rubianes Transfer Pricing Director EXPEDIA  Dan Peters Managing Director ALVAREZ & MARSAL  TJ Michaelson Senior Director – Global Transfer Pricing VISA  Moderator: Paul Sutton Partner LCN
10:55	Networking Break	

11:10	<p>Practical Approaches to Managing Risk Through APAs and MAPs</p> <p>In the last few years we have experienced increased pressure over multinational Groups' transfer pricing policies, which has had an immediate effect on double taxation and potential disputes. Additionally, the new international scenario with the implementation of Pillar 2 is creating even more potential double taxation. This situation has had an impact, and will result in an increase, in the number of APA and MAP's in different countries, as well as in the organisation of Tax Administrations in this area. Join our panel where we will share our experience among different players in the market, as well as Tax Administrations, from a practical perspective</p>	 Fanny Delaunay Transfer Pricing Director VERALTO  Nathan Hubbard Senior Transfer Pricing Manager ASML  Rodrigo Almeida Head of Tax Americas NISSAN MOTOR CORPORATION  Joan Hortala Partner, Transfer Pricing and Tax Governance CUATRECASAS  Moderator: Kirsten Burmester Member CAPLIN & DRYSDALE
12:00	<p>Bilateral APAs: The Experience Between the United States and Italy</p> <p>Most OECD member country double tax treaties include the legal basis for bilateral or multilateral Advance Pricing Agreements. Experience shows that recourse to these institutes has become more and more frequent and among the options selected by multinational enterprises to manage and address ex ante transfer pricing issues. The effectiveness of these procedures requires close cooperation between the competent authorities involved. This panel session will focus on the cooperation in this field which characterizes the relationship between the US and Italian tax administrations and that has resulted in a significant number of APAs involving the two jurisdictions.</p>	 Simone Zucchetti Partner TREMONTI, ROMAGNOLI PICCARDI E ASSOCIATI  Monalissa Cairncross Assistant Director – Group A; APMA Program IRS
12:30	Networking Lunch	
1:30	<p>Quickfire Showcase by Zanders</p> 	
1:40	<p>TP on Trial – Take-aways from Latest European Case Law</p> <p>Although a transfer pricing case is fact specific, there is always something to be learned. In this international field, landmark Court precedents have strong practical value going far beyond the borders of the Court's jurisdiction. In this session, Loyens & Loeff's transfer pricing expert, Jan-Willem Kunen, will guide you through the lessons learned from the latest leading Case Law within Europe, including global TP trends, focus areas for the tax authorities, take-aways on dispute prevention and management, as well as burden of proof principles.</p>	 Jan-Willem Kunen Tax Advisor LOYENS & LOEFF
2:10	<p>TP Controversy: Take-aways From Recent Transfer Pricing Cases</p> <p>As the current economic environment and continued reform of the international tax system continue to result in increased complexity, this panel will explore the landscape of transfer pricing controversy, including key highlights from recent U.S. and Canada Tax Court decisions, current developments, and trends in transfer pricing enforcement. Panellists will specifically look at how current and recent cases are impacting transfer pricing policies on the ground and what are the practical steps heads of transfer pricing have been taking as a result of these latest challenges to TP arrangements and Court decisions.</p>	 Elizabeth Weiler Corporate Tax Lead ZOOM  Suresh Nagpal Vice President - International Tax AMERICAN EXPRESS  Rodrigo Fernandez Principal, Transfer Pricing RYAN  David Farhat Partner, Tax SKADDEN

3:00	<p>Successful Approaches to Valuation of IP</p> <p>This panel discussion will cover the regulatory, technical economic, and practical aspects of IP valuation and related transactions in a cross-border context, including:</p> <ul style="list-style-type: none"> • Differences in global rules and approaches for IP valuation across jurisdictions; • Key considerations when choosing a method and data set; • Best practices in managing uncertainty and preparing for controversy; • Tales from the front lines: <ul style="list-style-type: none"> - What are some practical approaches to balancing the interests and requirements of the buyer and seller jurisdictions? - What valuation parameters are most often controversial? - How have you successfully resolved disputes? - Which lessons can be learned from recent court decisions? 	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  <p>Margaretha Haeussler Executive Director, Transfer Pricing NOVARTIS</p>  <p>James Dougherty Transfer Pricing Director NEWELL BRANDS</p> </div> <div style="width: 45%;">  <p>Moderator: Anna Soubotina Principal - Transfer Pricing CHARLES RIVER ASSOCIATES</p> </div> </div>
3:50	Networking Break	
4:05	<p>The North American TP Landscape – Canada, Mexico, the US</p>	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  <p>Himanshu Mishra Country Head, International Tax and Transfer Pricing UPS</p>  <p>Samit Shah Principal, Transfer Pricing Practice GRANT THORNTON (USA)</p> </div> <div style="width: 45%;">  <p>Fernando Pliego Partner & National Head of Transfer Pricing Practice GRANT THORNTON (MEXICO)</p>  <p>Peter Kurjanowicz Partner, Transfer Pricing GRANT THORNTON (CANADA)</p> </div> </div>
4:55	<p>Current TP Challenges with Financial Transactions</p> <p>With an increasing number of transfer pricing audits and litigation cases in the Financial Transaction Transfer Pricing (FTTP) area around the world in the past few years since the introduction of the Chapter X into the OECD Guidelines, how are taxpayers and tax authorities pricing this type of transactions? This panel will discuss recent experiences and key takeaways on dealing with transfer pricing audits on FTTP. We will also discuss practical solutions to deal with challenges such as using the volatile interest rate data in different jurisdictions when it comes to pricing intercompany financial transactions.</p>	<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">  <p>Inigo Arechabaleta Transfer Pricing Manager and Product Owner ZANDERS</p> </div> <div style="width: 45%;">  <p>Patrick Dervin Sr. Director - Global Transfer Pricing AON</p> </div> </div>
5:45	Chair's Closing Remarks	







CONTINUING PROFESSIONAL EDUCATION (CPE)




Continuing Professional Education Credits (CPE) will be provided in accordance with the National Association of State Boards of Accountancy (NASBA). State boards of accountancy have final authority on the acceptance of individual courses for CPE credit.

All credits will be provided following the conclusion of the conference.



PILLAR 2 SUMMIT DAY | FEBRUARY 17, 2025

8:15	Registration & Coffee	
8:55	Chair's Opening Remarks	 Mark Schuette Global Transfer Pricing Leader BDO USA
9:00	Recap of the Full Scope of GloBE Reporting & Compliance Requirements	
9:30	Current Status of Implementation Across Major Economies & Low Tax Jurisdictions	 Olga Anufrieva Tax Director SOFT SERVE INC
10:20	Coffee Break	
10:35	Preparing for Pillar 2 - Three Corporate Case Studies from the Trenches	 Chinyere Okechukwu Director, International Tax SCIENTIFIC GAMES  Scott Klein Principal, International Tax Services BDO USA  Andrew Ng VP of Global Tax MARRIOTT VACATIONS WORLDWIDE
11:25	Transfer Pricing Aspects of Pillar 2 <p>In line with most domestic legislation, the Pillar 2 rules require that all cross-border intragroup transactions are priced according to the arm's length principle. This rule sounds straightforward, but the commentary to the rules also contains several nuances that make applying this it in practice more complicated than expected. Furthermore, transfer pricing is not an exact science. Taxpayers and tax administrations, or multiple tax administrations, will often disagree on what is a correct arm's length price, leading to disputes, post-filing adjustments and mutual agreement procedures. The question is how this will impact your Pillar 2 position. To help you navigate these issues and optimize your transfer pricing policies, we will discuss the most relevant issues that come up when dealing with the transfer pricing in the context of Pillar 2. We will pay specific attention to the impact of APAs, year-end adjustments and other transfer pricing adjustments. Additionally, we will also talk about the impact of transfer pricing on CbCR and the Transitional Safe Harbour.</p>	 Laurie Dicker Transfer Pricing National Technical Leader BDO USA
12:15	Lunch	

1:15	<p>Legal Aspects of Pillar 2</p> <p>Designing and managing robust Pillar 2 compliance is built on a clear understanding of an MNE's legal entity footprint and the terms of intercompany transactions, taking into account the impact of joint ventures, M&A transactions and changes in the group structure. This session will explain how legal workstreams need to be integrated into the planning and implementation of Pillar 2 compliance, including legal due diligence, opportunities for corporate streamlining and ongoing legal processes required.</p>	 <p>Paul Sutton Partner LCN</p>
2:05	<p>Implications of Pillar 2 for M&A Transactions</p> <p>Mergers, demergers, acquisitions, and joint ventures come with many Pillar 2 attention points. The Pillar 2 GloBE rules have an impact on such transactions and corporate restructurings for the different parties involved. During this session the impact of the Pillar 2 GloBE rules is discussed based on practical examples and consideration is given on items to address in SPAs and shareholders agreements.</p>	
2:55	<p>Interaction of Pillar 2 and U.S. Tax Rules</p> <p>From the very beginning, the potential interaction between the U.S. Global Intangible Low-Taxed Income ("GILTI") regime and Pillar Two has been a concern, particularly for U.S. multinationals. Since it remains unlikely that the U.S. will amend its GILTI regime to align with the Pillar Two rules in the near future, understanding this interaction is critical. During this presentation, we will therefore review the latest OECD guidance on the recognition of GILTI under the Pillar Two rules and discuss whether there are any unresolved matters that require further attention from either the U.S. or the OECD.</p>	
3:45	<p>Coffee Break</p>	
4:05	<p>Operational Implementation of Pillar 2 – Addressing Data & Technology Challenges</p> <p>Pillar Two poses data and reporting challenges that, for many, are greater than the cash tax risk from additional liabilities arising under the new rules. While the transitional safe harbours reduce the work required in initial years, most Pillar Two businesses are finding that some territories remain in full reporting. This may be a benefit, as it provides a chance to understand and address Pillar Two's data requirements and put in place supporting technology before the need to scale up to full groupwide reporting after 2027. In this session we will look at the practical challenges to providing robust data quickly and easily, how technology can help, and what to do when technology on its own does not provide the full solution.</p>	 <p>Larry LeBlanc Partner, International Tax Services RSM</p>  <p>Rachael Atkins Senior Manager RSM Canada</p>
4:55	<p>Bringing Your Pillar 2 Strategy Together - Project Management Workshop Session</p>	
5:55	<p>Chair's Closing Remarks</p>	

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Transfer pricing touches many areas of businesses engaged in activities that cross taxing jurisdictions. As governments become more aggressive in their pursuit of tax revenue, businesses with international or interstate operations will face not only increased risk but also increased opportunity when it comes to their transfer pricing life cycle. Regulatory authorities are focusing on related-party transactions, and the number of transfer pricing audits is expected to rise.

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Thanks to our extensive knowledge and experience in transfer pricing, we provide integrated advisory services for related-party transactions by designing transfer pricing policies, handling business restructurings, and negotiating advance pricing arrangements with the tax authorities. We also assist our clients during the mandatory documentation stage of related-party transactions, as well as carrying out the comparability analysis. We represent them during tax audits and court proceedings, and assist in mutual agreement and arbitration procedures to avoid double taxation.

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Website: www.crai.com



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Website: zandersgroup.com/en



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Sponsorship & Exhibition Enquiries

David Gold,
Business Development Manager

 David.Gold@informa.com

 +44 (0)20 8052 0467

Speaker & Agenda Enquiries

Michele Costa,
Conference Director

 Michele.Costa@informa.com

Media & Website Queries

Rosana Pillajo-Cabrera,
Marketing Manager

 Rosana.PillajoCabrera@informa.com