

# SESSIONS

PRE-CONFERENCE WORKSHOPS - 18/04/2022

TP Minds Americas

Workshops: April 18, 2022  
Main Conference: April 19 - 20, 2022  
Fontainebleau Miami Beach  
Florida

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## Pre-Conference Workshop A - Fit For the Future: Integrated Technology Based Solutions for Today's Complex Transfer Pricing Challenges Including BEPS 2.0, CbC Reporting and More

10:00am - 11:30am

Live Interactive Workshop - Flicker Ballroom

### Participants

**Anju Singh** - National Leader - Operational Transfer Pricing, RSM US

**Tansy Jefferies** - Principal, International Tax, RSM

**Chris Carroll** - Senior Manager, International Tax, RSM

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### Coffee Break

11:30am - 12:00pm

Live Interactive Workshop - Flicker Ballroom

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## Pre-Conference Workshop B - APAs and MAPs – Where is APMA Today?

12:00pm - 1:30pm

Live Interactive Workshop - Flicker Ballroom

- Trends: Growing Importance of Value Chain and DEMPE

Recent Experiences:

- North American Competent Authorities – Experiences with Canada

- European Competent Authorities – Experiences with U.K., Germany and France

- Asian Competent Authorities – Experiences with India, Singapore and Korea

- Navigating MAP Implementation

### Participants

**Clark Armitage** - Member, CAPLIN & DRYSDALE

**Amanda Leon** - Associate, Washington D.C., CAPLIN & DRYSDALE

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### Lunch Break

1:30pm - 2:00pm

Live Interactive Workshop - Flicker Ballroom

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## Pre -Conference Workshop C: The Secret Sauce: Blending Customs Valuation and Transfer Pricing Into a Winning Formula

2:00pm - 3:30pm

Live Interactive Workshop - Flicker Ballroom

### Participants

**Yvonne Golby** - Managing Director, Transfer Pricing Implementation & Automation, BDO

**Damon V. Pike** - International Tax Principal; Customs & International Trade Services, BDO

**Paul Sutton** - Co-Founder, LCN LEGAL

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### Coffee Break

3:30pm - 4:00pm

Live Interactive Workshop - Flicker Ballroom

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## Pre-Conference Workshop D: I/C Financing, An Evolving Landscape: Quo Vadis?

4:00pm - 5:30pm

Live Interactive Workshop - Flicker Ballroom

- Global case law review, OECD Chapter X and practical implications
- Considerations for US funding structures in Europe
- I/C Cash Pools: pragmatic views

### Participants

**Jared Walls** - Transfer Pricing, VALENTIAM GROUP - WTS GLOBAL USA

**Melanie Appuhn-Schneider** - Director, WTS - WTS GLOBAL GERMANY

**Andy Neuteleers** - Partner, TIBERGHIE - WTS GLOBAL BELGIUM & LUXEMBOURG

**Chris Liu** - Managing Director, FTI CONSULTING - WTS GLOBAL UNITED KINGDOM

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11:00AM	11:30am - Coffee Break
12:00PM	12:00pm - Pre-Conference Workshop B - APAs and MAPs – Where is APMA Today?
1:00PM	1:30pm - Lunch Break
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3:00PM	3:30pm - Coffee Break
4:00PM	4:00pm - Pre-Conference Workshop D: I/C Financing, An Evolving Landscape: Quo Vadis?

# SESSIONS

MAIN CONFERENCE DAY 1 - 19/04/2022

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## Registration and Coffee Networking

8:30am - 9:00am  
Main Conference Stage - Flicker Ballroom

## Chair's Opening Remarks

9:00am - 9:10am  
Main Conference Stage - Flicker Ballroom

## Participants

**Mark Schuette** - National Practice Leader & Global Transfer Pricing Centre of Excellence Leader, BDO

## BEPS Pillars 1 & 2 and the Impact of Global Minimum Tax

9:10am - 9:40am  
Main Conference Stage - Flicker Ballroom

This presentation from leading North American economists shares the latest updates on the biggest changes posed to US multinationals and on a global scale following the release of new OECD guidelines and the agreement towards Global Minimum Tax.

## Participants

**Lorraine Eden** - Professor, TEXAS A&M UNIVERSITY

## The Industry's Perspective - BEPS 2.0

9:40am - 10:30am  
Main Conference Stage - Flicker Ballroom

Hear our panel bring to the stage the industry's perspective on BEPS 2.0 including:

- Reaction to OECD Proposals
- GLoBe rules/global minimum tax
- Implementation
- Considerations for planning and the future

## Participants

**Monika Loving** - National Practice Leader & Managing Partner, International Tax Services, BDO

**Pramod Kumar** - Global Tax Director, MICHELIN

**Jamie Eagan** - VP Product Management, INSIGHTSOFTWARE

**Humberto Reboredo** - Managing Director, Global Head of Tax, MORGAN STANLEY

## Morning Coffee Break

10:30am - 10:50am  
Main Conference Stage - Flicker Ballroom

## Operational Tax and Automation Challenges

10:50am - 11:40am  
Main Conference Stage - Flicker Ballroom

Our panel discusses a variety of challenges affecting tax teams, technology available, automation of audits and documentation and regulation, tax forecasting and the future for tax teams.

## Participants

**Steve Cullimore** - Partner, Transfer Pricing, BDO

**Nicole Williams** - Director, Global Transfer Pricing, CELANESE

**Raul Lopez** - Global Transfer Pricing Director, CORPORATIVO BIMBO

**Selena Schneider** - Senior Director, Transfer Pricing, TE CONNECTIVITY

## A Global APA Strategy – How to Make it Work

11:40am - 12:30pm  
Main Conference Stage - Flicker Ballroom

- Foundational Elements: consistent global TPM; transparency and cooperation on audit; core government partners
- Challenges (and possibilities) with multilateral APAs
- Unilateral and complementing bilateral APAs

## Participants

**Enrique Colon Jr.** - Head of Tax, GLOBENET

**Clark Armitage** - Member, CAPLIN & DRYSDALE

**Joan Hortala** - Partner, Transfer Pricing and Tax Governance, CUATRECASAS

**Amanda Leon** - Associate, Washington D.C., CAPLIN & DRYSDALE

## Lunch Break

12:30pm - 1:30pm  
Main Conference Stage - Flicker Ballroom

## From Reactive to Proactive: How Technology Enables More Strategic Operational Transfer Pricing

12:30pm - 12:40pm  
Live Demonstration

See how a dedicated software allows you to more quickly collect actuals, segment P&Ls, and clearly see when there's a deviation from your strategy so you can proactively make incremental price adjustments. We'll demonstrate how insightsoftware's Longview Transfer Pricing provides greater visibility and continuous monitoring to minimize year-end surprises.

## Participants

**Anna Marie Server** - Director of Solutions Engineering, INSIGHTSOFTWARE

## Transfer Pricing in the Metaverse

1:30pm - 2:00pm  
Main Conference Stage - Flicker Ballroom

- Defining the undefined
- Hard to value intangibles get harder
- Applying the arm's length standard (when there are no physical arms)

## Participants

**Bob Bamsey** - Principal, WITHUM

## Tax Efficient Supply Chain Planning

2:00pm - 2:50pm  
Main Conference Stage - Flicker Ballroom

COVID's impact on supply chain has been a major headache for many corporations. Hear from our panel of leading experts the changes they've made to stay tax efficient across all parts of their value and supply chain.

## Participants

**Jed Larkin** - Senior Vice President, 3M

**Barb Derus** - Transfer Pricing Partner & Global Value Chain Practise Lead, BDO

**Kathryn O'Brien** - Executive Director, Global Risk Management & Planning, CARRIER CORPORATION

**Keith Brockman** - VP Global Tax, WELBILT

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## IP Transfer Planning Options Under a New Global Tax Environment

2:50pm - 3:40pm

Main Conference Stage - Flicker Ballroom

- IP structures and pricing given economic setbacks and potential changes in tax regimes
- Acquisitions, integration, divestitures and operational issues
- Value creation, risk and DEMPE analyses and documentation in the face of aggressive tax audits
- Impact of a remote, globally dispersed workforce on IP structures, DEMPE and profit allocations

### Participants

**Justin Berutich** - Head of Tax, EUCLID

**Rodrigo Fernandez** - Partner, ECONOMICS PARTNERS

**Richard Slowinski** - International Tax and Transfer Pricing Partner, ALSTON & BIRD

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## Afternoon Break

3:40pm - 4:00pm

Main Conference Stage - Flicker Ballroom

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## The Profit Split Method in the Current Transfer Pricing Landscape

4:00pm - 4:50pm

Main Conference Stage - Flicker Ballroom

### Participants

**Lorraine Eden** - Professor, TEXAS A&M UNIVERSITY

**Patrick Dervin** - Sr. Director - Global Transfer Pricing, AON

**Matthew De Felice** - Partner, VALENTIAM GROUP - WTS GLOBAL USA

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## In-House Perspectives on Practical Transfer Pricing Challenges

4:50pm - 5:40pm

Main Conference Stage - Flicker Ballroom

Join our panel to hear their perspectives on a variety of tax and transfer pricing tools for implementation as well as an overview of new requirements from the OECD, IRS, best practise and more.

### Participants

**Dan McGeown** - Director, Transfer Pricing Services, BDO

**James Huber** - VP, Transfer Pricing, EATON (FORMERLY)

**Ami Goldenstein** - Transfer Pricing Lead US and Latin America, TAKEDA PHARMACEUTICALS

**Yan Reznikov** - Global International Tax & Transfer Pricing, VICTAULIC

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## Chairs' Closing Remarks & Drinks Reception

5:40pm - 7:40pm

Main Conference Stage - Flicker Ballroom

### Participants

**Mark Schuette** - National Practice Leader & Global Transfer Pricing Centre of Excellence Leader, BDO

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9:00AM		9:00am - Chair's Opening Remarks 9:10am - BEPS Pillars 1 & 2 and the Impact of Global Minimum Tax 9:40am - The Industry's Perspective - BEPS 2.0
10:00AM		10:30am - Morning Coffee Break 10:50am - Operational Tax and Automation Challenges
11:00AM		11:40am - A Global APA Strategy – How to Make it Work
12:00PM	12:30pm - From Reactive to Proactive: How Technology Enables More Strategic Operational Transfer Pricing	12:30pm - Lunch Break
1:00PM		1:30pm - Transfer Pricing in the Metaverse
2:00PM		2:00pm - Tax Efficient Supply Chain Planning 2:50pm - IP Transfer Planning Options Under a New Global Tax Environment
3:00PM		3:40pm - Afternoon Break
4:00PM		4:00pm - The Profit Split Method in the Current Transfer Pricing Landscape 4:50pm - In-House Perspectives on Practical Transfer Pricing Challenges
5:00PM		5:40pm - Chairs' Closing Remarks & Drinks Reception

# SESSIONS

MAIN CONFERENCE DAY 2 - 20/04/2022

TP Minds Americas

Workshops: April 18, 2022  
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## Registration and Coffee Networking

8:30am - 9:00am  
Main Conference Stage - Flicker Ballroom

## Chair's Opening Remarks

9:00am - 9:10am  
Main Conference Stage - Flicker Ballroom

## Participants

**Steve Cullimore** - Partner, Transfer Pricing, BDO

## Opening Keynote Address from the OECD

9:10am - 9:50am  
Main Conference Stage - Flicker Ballroom

## Participants

**Manuel De Los Santos Poveda** - Acting Head of the Transfer Pricing Unit – OECD CTPA, OECD

## Optimizing the Links Between TP and Provision

9:50am - 10:40am  
Main Conference Stage - Flicker Ballroom

Hear from panelists on the opportunities and challenges to improving the connections between operational TP and tax provision to streamline the tax rate forecasting processes, deliver tax insights and optimize resources.

## Participants

**Josh Walls** - Transfer Pricing Director, VALENTIAM GROUP - WTS GLOBAL USA

**George Georgiev, Ph.D.** - Senior Director, Transfer Pricing and Economic Analyses, SIEMENS

**Joe Emmolo** - Vice President Tax and Tax Counsel, FLIGHT CENTRE TRAVEL GROUP

## Morning Coffee Break

10:40am - 11:00am  
Main Conference Stage - Flicker Ballroom

## Best Practices and Strategies for Successfully Resolving Transfer Pricing Audits and Minimizing Controversy

11:00am - 11:50am  
Main Conference Stage - Flicker Ballroom

- Transfer Pricing documentation best practise
- Defending your position
- Defence on a budget
- IRS approaches to Audits in 2022

## Participants

**Keith Brockman** - VP Global Tax, WELBILT

**Claire Donovan** - TP Manager, AMAZON

**Brian Vincent** - Partner, ECONOMICS PARTNERS

**Azedine Assassi** - Transfer Pricing Leader, GE AVIATION

**E. Miller Williams** - Counsel, Transfer Pricing, ALSTON & BIRD

## Operational Transfer Pricing in Low and Middle Income Countries

11:50am - 12:40pm  
Main Conference Stage - Flicker Ballroom

## Participants

**Chad Martin** - Senior Manager, BASEFIRMA DENVER

**Pedro Tobar** - Transfer Pricing Senior Manager, HALLIBURTON

**Flavia Siuves** - Transfer Pricing and Tax Planning Director, FINASTRA

**Diego Ramirez** - Senior Manager, Transfer Pricing, BASEFIRMA COLOMBIA

**Ami Goldenstein** - Transfer Pricing Lead US and Latin America, TAKEDA PHARMACEUTICALS

## Lunch Break

12:40pm - 1:40pm  
Main Conference Stage - Flicker Ballroom

## LATAM TP Update – The Good, The Bad and The Services

1:40pm - 2:30pm  
Main Conference Stage - Flicker Ballroom

A comprehensive update on LATAM tax updates for US and global multinationals with diverse filing and reporting requirements in Latin America.

## Participants

**Carolina Zuluaga** - Senior Manager, BASEFIRMA COLOMBIA

**Eduardo Emmerich** - Senior Manager, BASEFIRMA HOUSTON

## Managing The Legal Implementation of TP – Practical approaches

2:30pm - 3:20pm  
Main Conference Stage - Flicker Ballroom

Lead by LCN Legal, a specialist law firm in Intercompany Agreements, this panel will discuss best practise when it comes to preventing disputes through sound legal implementation built into your tax team.

## Participants

**Ivan Hanna** - Partner, LCN LEGAL

**Matheus Piedade** - VP Global Tax, PLAYA RESORTS

**Adnan Begic** - Transfer Pricing Specialist, MICHELIN

**Kurt Wulfekuhler** - Director, VERIZON

## Afternoon Break

3:20pm - 3:40pm  
Main Conference Stage - Flicker Ballroom

## Trends and Conclusions in Recent Litigation

3:40pm - 4:30pm  
Main Conference Stage - Flicker Ballroom

Many tax litigation cases have hit the global stage, and not just from the US. This session will cover the main cases that have disrupted the tax authority-taxpayer relationship and what the global and US implications could be down the line.

## Participants

**Leiza Bladd-Symms** - Partner, LCN LEGAL

**Perry Urken** - Partner, ECONOMICS PARTNERS

**Lionel Nobre** - Vice President, Latin America Tax, DELL

**Matt Backus** - Senior Manager, Global Tax, AUTHENTIX

**Ainsley Gaddis** - Transfer Pricing Controversy Leader, GE HEALTHCARE

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## Operational Transfer Pricing in SAP – Inside What is Available Now

4:30pm - 5:20pm

Main Conference Stage - Flicker Ballroom

The automation of operational transfer pricing processes with integrated data management is on top of many Tax and Finance director's agendas. Without ongoing monitoring of (segmented) margins along intercompany value chains and without the option to proactively steer calculation and pricing-setting processes, significant tax risks are unavoidable. In this session, EXA AG, one of the leading providers of software tools for TP in SAP gives insights to latest developments, trends and capabilities to manage TP globally. See what is possible now in SAP ERP or SAP S/4HANA landscape with an "Add-on" Software for integrated TP data and IC process management.

### Participants

**Frank Schoeneborn** - Head of OTP Software Program, EXA AG

**Rebecca Binggeli** - Senior Director Transfer Pricing and International Tax Strategy, ELANCO

**Kate Carlin** - Director, Global Transfer Pricing, ELANCO

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## Chair's Closing Remarks and End of Conference Networking

5:20pm - 5:30pm

Main Conference Stage - Flicker Ballroom

### Participants

**Steve Cullimore** - Partner, Transfer Pricing, BDO

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12:00PM	12:40pm - Lunch Break
1:00PM	1:40pm - LATAM TP Update – The Good, The Bad and The Services
2:00PM	2:30pm - Managing The Legal Implementation of TP – Practical approaches
3:00PM	3:20pm - Afternoon Break 3:40pm - Trends and Conclusions in Recent Litigation
4:00PM	4:30pm - Operational Transfer Pricing in SAP – Inside What is Available Now
5:00PM	5:20pm - Chair's Closing Remarks and End of Conference Networking