

Fusion 2025 – An international corporate tax summit

Agenda

8:30 AM – 9:00 AM	**Breakfast & Registration**
9:00 AM – 9:30 AM	**Welcome Remarks & Opening Keynote**
9:30 AM – 10:20 AM	**One Big Beautiful Bill** • Overview of OB3 and how other countries implemented similar legislation • Evaluating OB3's influence on international tax planning and U.S. competitiveness • Review coordination of international provisions: Interaction, Compliance Challenges, and Legislative Updates
10:20 AM – 10:40 AM	**Break**
10:40 AM – 11:30 AM	**Pillar Two Update** • Review of the G7 Agreement & Potential U.S. Exemption: Questions to be Answered • Latest Jurisdictional Responses to Pillar Two: Legislative updates from Europe and Asia • Compliance Implications Post-G7 Agreement: How multinationals are reacting to the uncertain "when/where/how" of Pillar Two filing obligations
11:30 AM – 1:00 PM	**Lunch**
1:00 PM – 1:50 PM	**Transfer Pricing Trends: Controversy in Europe and Asia, Intercompany Financing, and IP Restructuring**



- European Controversy and Litigation Trends: Aggressive audit tactics, burden of proof reversals, and MAP bypass strategies in Europe and Asia
- Intercompany Financing Under Pressure: Impact of rising interest rates and new laws on financing structures.
- IP Migration and Value Chain Restructuring: Planning strategies for inbound IP to the U.S. and navigating exit tax rules.

1:50 PM - 2:40 PM **Worldwide Customs & Tariffs**

- Global Trade War Impacts: Legislative and customs adjustments in response to the increase in U.S. customs.
- Customs vs. Tax Transfer Pricing Conflicts: Exploring how differing objectives between customs and tax authorities lead to inefficient taxation and compliance challenges.
- Supply Chain Planning to Mitigate Customs Exposure: Strategic approaches to optimize supply chains and reduce customs duties and compliance risks.

2:40 PM - 3:00 PM **Break**

3:00 PM - 3:50 PM **WTS Global Countries Update**

- Regional Legislative Highlights: Key tax developments from Europe & Asia.
- Pillar 2 and Participation Exemption Misalignment: Challenges in jurisdictions where dividends from low-taxed entities may be taxed again despite top-up tax payments under Pillar 2
- Anti-Hybrid Rules and Cross-Border Impacts: German and EU developments affecting U.S. multinationals.

4:00 PM – 5:00 PM **Reception**