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Agenda

- Pillar Two implementation and policy matters
- **02** Practical challenges
- Best practices businesses are adopting
- **04** What lies ahead?
- **05** Client insights



Today's KPMG panel presenters



Janette Wilkinson
Global BEPS Leader
Partner, KPMG United Kingdom



Florian Geiger
Partner
KPMG Germany

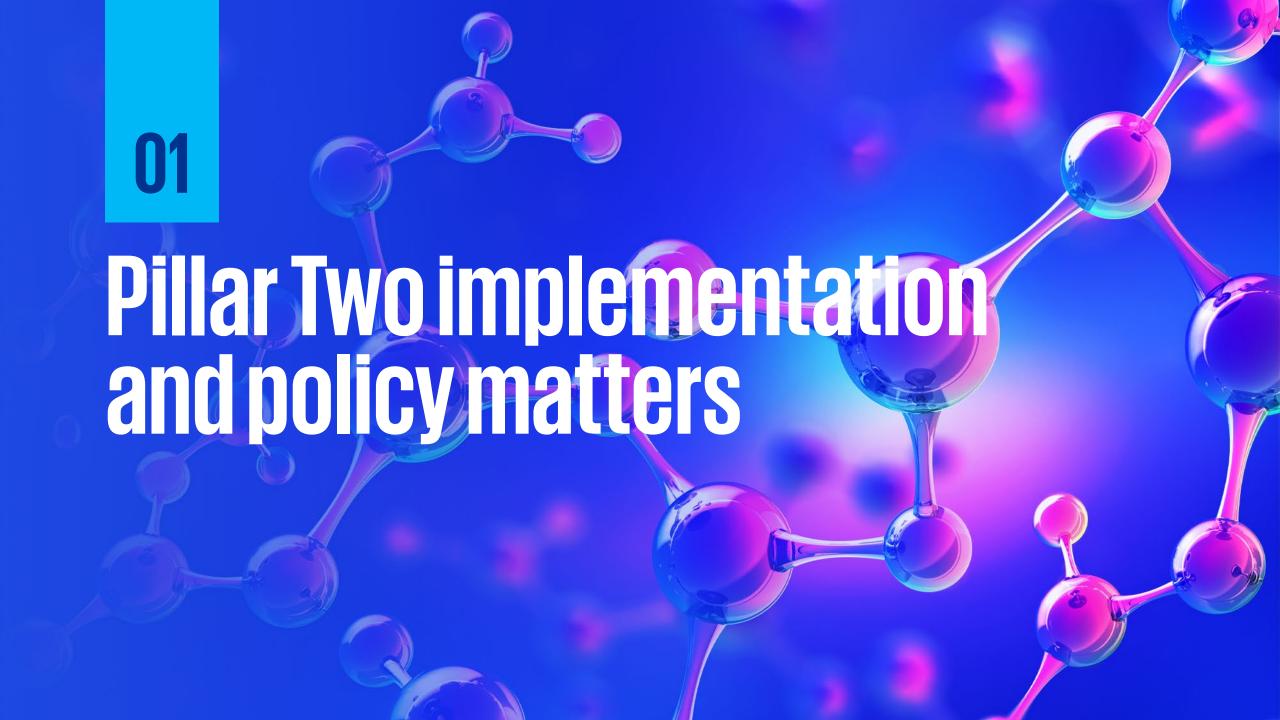


Grant Wardell-JohnsonGlobal Tax Policy Leader
KPMG United Kingdom



Lieke MutsaersDirector
KPMG Netherlands





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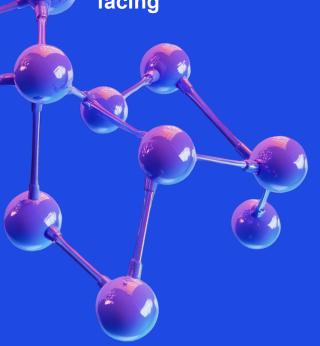


Lieke MutsaersDirector
KPMG Netherlands



Practical challenges

What are some of the practical challenges MNE Groups are facing



01

Safe harbour access and CbCR qualification

02

Local country implementation and interpretation

03

Data gathering for Pillar Two registration and compliance requirements 04

Choosing the right technology for Pillar Two





Best practices

Tax Sharing

Agreement

expectations **Embedding Pillar** Two analysis within operational and M&A transactions





Legal structure review

Engaging with auditors to

align with their





Client insights



Kevin Tipton Director, Tax Transformation, **KPMG United Kingdom**



Tom Kipping Head of Tax London Stock Exchange Group



Julian Oldaker Vice President & Chief Tax Officer Medtronic



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