



# Tackling fragmented global tax policy: future trends and how to respond

2025 KPMG EMA Tax Summit

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Tuesday 24 June

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# Today's presenters



**Tim Sarson**  
Partner, Head of UK  
Tax Policy  
KPMG in the UK



**Grant Wardell-  
Johnson**  
Partner, Global Tax  
Policy Leader  
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**Danielle Rolfes**  
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**Vinod Kalloe**  
Partner, Head of  
International Tax  
Policy  
KPMG in the  
Netherlands



**Conrad Turley**  
Partner, ASPAC Tax  
Policy Lead  
KPMG in China

# Polling question

Q: What is the biggest issue facing you as a HoT today?



**Tariffs**



**US tax  
retaliation/section  
899**



**Pillar Two**



**Something else**



# Fragmenting global tax policy

# Polling question

**Q: What is the future of Pillar Two?**



**Permanent UTPR  
safeharbour**



**IIR equivalence for  
US GILTI**



**Scrap UTPR**



**Something else**



**What should  
you do?**



# Three Golden Rules

**1**

**Scenario plan**

**2**

**Stay calm – but  
don't get  
complacent**

**3**

**Make  
Representations**





**Q&A**

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