



Staying Cool as New Transfer Pricing Regulations Heat Up

June 11, 2024

Ahead
of the **wave**

2024 U.S. Cross-Border Tax Conference



Notices

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With you today

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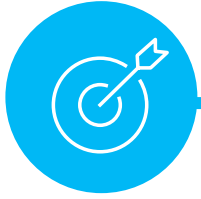
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For discussion



**Retreat/
re-alignment
to substance**



**Focus on
attribute
optimization**



**The continually
evolving value
chain**



**Looking
ahead**



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