



Pie Geelen
PRINCIPAL
HEAD OF EUROPEAN TAX DESK

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Pie Geelen has over 14 years of experience in International Tax. He has assisted many US multinational companies with a presence in the Netherlands both in day to day tax advice as well as assistance in the planning and implementation of complex cross-border tax structuring.

• Tax

Pie has broad transfer pricing experience with respect to the setup of tax aligned business models for the overseas operations of US multinationals. In addition Pie has experience assisting Dutch and US clients in mergers & acquisitions, liquidations and finance and leverage structures.

As part of the international tax practice Pie has first-hand experience in ruling negotiations with the Dutch tax authorities for international clients.

Pie Geelen does not provide legal services.

Prior Experience

Before joining DLA Piper Pie was with a Big 4 accounting firm where he led the Dutch Tax Desk in New York from 2010 through 2015.

Education

- University of Amsterdam, Law School, 2001

Memberships

- Member of the Dutch Association of Tax Lawyers

Publications

OECD releases draft Model Rules on Scope of Amount A under Pillar 1

5 April 2022

Comments on the draft rules are due on April 18, 2022.

OECD releases commentary on the Pillar Two GloBE Rules – observations on selected topics

17 March 2022

A look at six topics found in the commentary which have particular relevance for multinational companies and other stakeholders.

OECD publishes draft Tax Base Determination rules for Pillar 1 Amount A

22 February 2022

As part of a rolling release of draft Model Rules for Amount A of Pillar 1, on 18 February 2022, the OECD released for public comment draft Model Rules for defining the Tax Base that is the subject of the income reallocation envisioned by Amount A of Pillar 1.

OECD makes progress on Pillar 1 – release of draft Sourcing and Nexus Rules of Amount A

7 February 2022

Comments are due February 18, 2022.

EU Directive ATAD 3 proposes new minimum substance rules against the use of shell companies

4 January 2022

The Directive introduces reporting requirements for EU tax-resident companies – irrespective of their legal form – with certain mobile and passive income streams and inadequate operational substance.

Following suit, European Commission publishes draft EU Directive to swiftly implement OECD 15 percent global minimum tax

23 December 2021

The proposal delivers on the EU's pledge to ensure swift and harmonized implementation of the historic international agreement on global tax reform.

OECD issues detailed rules to implement global minimum tax: a look at the 10 chapters

21 December 2021

The guidelines provide a detailed description of the rules that the jurisdictions under the Inclusive Framework are to implement in their local legislation.

OECD announces global deal on international tax reform with its Two-Pillar solution

11 October 2021

In addition, the OECD sets out a detailed implementation timeline aiming to have parts of the plan ratified in 2022 and effective as early as 2023.

Events

Previous

Key considerations in OECD Pillar Two global minimum tax model rules

5 May 2022

Webinar

An update for US companies on the OECD global tax deal

21 October 2021 | 12:00 - 1:00 ET

Webinar
