



2025



14^{IFA}

Colombian
Congress on
International
Taxation

Agenda



**Club
El Nogal**

Ak 7 #78-96



**Nov
13 — 14**

Day 1 (Thursday)

November 13th, 2025

Opening	Opening remarks Mónica Bolaños IFA Colombia President	8.00 - 8.30 a.m. 30 min
Conference	Developing countries and the OECD and UN agenda: Where are we headed? Marcio F. Verdi Executive Secretary of the Inter-American Center of Tax Administrations (CIAT)	8.30 - 9.10 a.m. 40 min
	International Impact of the United States fiscal policy: Global reactions and challenges for Colombia	9.10 - 10.30 a.m. 80 min
Conference	Direction and priorities of the United States' international fiscal policy Devon Bodoh Partner at Weil, Gotshal & Manges - United States	9.10 - 9.30 a.m.
Panel	Global responses and perspectives for Colombia Andrea Riccardi IFA Latam Vice President Błażej Kuźniacki Senior Manager and Advisor at PwC Netherlands and Professor at Lazarski University Devon Bodoh Partner at Weil, Gotshal & Manges - United States Ricardo Ruiz Tax & Legal Leader Partner at KPMG Col Andrés Bermúdez^m Director at Godoy	9.30 - 10.30 a.m.
Break		
Panel	Colombia on the global stage: taxation as the key to competitiveness Ana Fernanda Maiguashca President of the Private Competitiveness Council Gerardo Reyes-Tagle Lead Fiscal Economist at the Inter-American Development Bank Jonathan Malagón^m ASOBANCARIA President	11.00 a.m. - 12.00 p.m. 60 min
Panel	20 years of tax treaties in Colombia: Contributions to development and tax certainty Andrés González Partner at Martínez Natalia Aristizabal Advisor on International Taxation and Information Exchange Pedro Sarmiento Partner at Crowe Colombia Juan Guillermo Ruiz^m Partner at PHR Legal	12.00 - 1.00 p.m. 60 min
Lunch		

Conference	The UN framework convention on taxation: Progress and Prospects Enrique Bolado M. Member of the UN Tax Committee and Director General of International Treaties at the Mexican Ministry of Finance	2.30 - 3.00 p.m. 30 min
Panel	International taxation for innovative businesses Andrés Parra Partner at EY Carlos G. Rodríguez Partner at Esguerra JHR Jorge López Partner at Garrigues Cristina Stiefken^m Manager of Corporate and International Taxes at Inversiones IJG	3.00 - 4.00 p.m. 60 min
Panel	Interpretation of tax treaties in Colombia: Controversial cases and the Colombian tax Authority's doctrineal approach Carlos Gómez Partner at ECIJA Juan S. Torres Partner at BDO Marta Toro Partner at PwC Colombia Cesar Cermeño^m Partner at Martínez	4.00 - 5.00 p.m. 60 min
Panel	Special cases in the categorization of income under tax treaties: challenges and solutions Jose A. Romero Partner at Romero Strategy Lab and Vice President of ICDT Michelle Visbal Scientific Director of IFA Colombia and Tax Director at Serrano Martínez Rafael Lafont Partner at Holland & Knight Andrés Hernández^m Partner at Brigard Urrutia	5.00 - 6.00 p.m. 60 min
YIN awards ceremony		6.00 - 6.30 p.m.

Specialized Technical Roundtable Discussions

Wealth management and private client trends Carolina Acuña Partner at Deloitte Felipe Aroca Vives Partner at Aroca Vives Abogados Bejamin Cubides^m Partner at Cuval Abogados	12.00 p.m.
Colombia: Investments into, from, and through the United States and Panama José Galindez IFA Panama President Michael Silva Tax Partner, McDermott, Will & Emery LLP Mónica Reyes Founding Partner at Reyes Abogados Asociados Juan David Velasco^m Partner at Baker McKenzie	2.30 p.m.
Tax technology in compliance and tax auditing Andrés Cortés International Lead Partner of Tax & Legal at Forvis Mazars Daniela Garzón Advisor to the General Commissioner of the Colombian Tax Authority (DIAN) Julio Toro Partner at Toro Asociados Giovanni Bohorquez^m Partner at Moore	4.00 p.m.

Day 2 (Friday)

November 14th, 2025

Conference	Current perspectives on the BEPS project 10 years after the final report package Andrew Auerbach Senior Tax Advisor at the OECD	8.00 - 8.40 a.m. 40 min
------------	--	----------------------------

	Anti-abuse rules in tax matters	8.40 - 10.00 a.m. 80 min
--	---------------------------------	-----------------------------

Conference	International trends in the assessment of tax abuse Błażej Kuźniacki Senior Advisor and Manager at PwC Netherlands and Professor at Lazarski University	8.40 - 9.10 a.m.
------------	---	------------------

Panel	Anti-abuse rules and LOBs in tax treaties signed by Colombia: selected cases Błażej Kuźniacki Senior Advisor and Manager at PwC Netherlands and Professor at Lazarski University Gabriel Muñoz Auxiliary Magistrate of Section IV of the Council of State Michael Silva Tax Partner, McDermott, Will & Emery LLP Zulay Arévalo Senior Manager at EY Juan C. de Bedout^m Partner at PHR Legal	9.10 - 10.00 a.m.
-------	--	-------------------

	Break	10.00 - 10.30 a.m.
--	-------	--------------------

Panel	Real estate or not real estate? Challenges in applying tax treaty rules on income and real estate substance Luis Guillermo Rubio Partner at Deloitte Jaime Vargas Partner at Cuatrecasas Pedro Madera Partner at KPMG Camilo Zarama^m Partner at Garrigues	10.30 - 11.30 a.m. 60 min
-------	--	------------------------------

Panel 	Redefining the concept of royalties: Taxation of digital services under double taxation treaties Daniel Duque Partner at Brigard Urrutia Isabella Bello Tax Director at PwC Colombia Nathalie Medina Senior Lawyer at Cuatrecasas Juan A. Palacios^m Director Partner at Lewin & Wills	11.30 a.m. 12.30 p.m. 60 min
--	--	------------------------------------

Discussion	IFA Global and IFA Latam initiatives Alvaro Villegas IFA Latam President Natalia Quiñonez IFA Global President	12.30 - 12.50 p.m. 20 min
------------	--	------------------------------

	Lunch	12.50 - 2.20 p.m.
--	-------	-------------------

Conference	Case law of the Colombian constitutional court and the council of state on international taxation: 20 years of evolution Lucy Cruz Partner at Quiñones Cruz Myriam Gutierrez Magistrate of the Council of State IFA 2025 Women in Tax Awardee	2.20 - 3.00 p.m. 40 min
------------	---	----------------------------

Panel	New rules for the 2025 model agreements and the strategic agenda of the UN committee of experts: perspectives for Colombia and Latin America Alvaro Villegas IFA Latam President Alvaro Romano Member of the UN Tax Committee Director of Tax Advisory, Ministry of Economy and Finance, Uruguay Ciro Meza Partner at Baker McKenzie Martha Reyes Partner at BDO Colombia Natalia Quiñonez^m IFA Global President	3.00 - 4.00 p.m. 60 min
-------	--	---------------------------------------

Panel	How does the world decide? International case law on transfer pricing Agata Uceda Partner at KPMG Meijburg&Co - Netherlands Carolina Zuluaga Senior Transfer Pricing Manager at BaseFirma Clara Ines Ramirez Associate Director at Godoy Bibiana Buitrago^m Partner at Esguerra JHR	4.00 - 5.00 p.m. 60 min
-------	--	---------------------------------------

ICDT Panel	International Aspects of the Tax Reform Adrián Rodríguez Founder, Rodriguez Piedrahita Tax Law Mauricio Piñeros Country Chair at Pérez-Llorca, Gómez-Pinzón Ruth Yamile Salcedo Director, Tax and Public Law Department, UCS Abogados	5.00 - 6.00 p.m. 60 min
------------	--	---------------------------------------

Close	Closing remarks by the Colombian Tax Authority (DIAN)*	6.00 - 6.30 p.m. 30 min
-------	---	---------------------------------------

Close	Closing remarks by the Vice President of IFA Diego Cubillos IFA Colombia Vice President	6.30 - 6.40 p.m. 10 min
-------	--	---------------------------------------

Social event at Vista Corona		7.30 p.m.
------------------------------	--	-----------

Specialized Technical Roundtable Discussions

Value creation in transfer pricing according to BEPS actions 8-10: What's the situation in Colombia?	10.30 a.m.
Carlos Botía Partner at Botía Suárez Gastón Fiorentino Partner at IG TP Experts Laura Sanint^m Partner at SanintRivas	

Wealth management and private client trends	2.20 p.m.
Camilo Cortés Partner at Dentons Cárdenas & Cárdenas Abogados Carolina Cañon Partner at Cañon Thompson Rodrigo Castillo^m Partner at Rimon Law	

Tax technology in tax compliance and enforcement	4.00 p.m.
Alejandro Sanabria Partner at Pérez-Llorca, Gómez-Pinzón Carmén Sanabria Partner at Dentons Cárdenas & Cárdenas Abogados Oscar Iván González^m Scientific Director of IFA Colombia and Partner at GHAN Abogados	

*Panelists to be confirmed

Diamond

Deloitte.



GARRIGUES



POSSE
HERRERA
RUIZ



Gold



**Baker
McKenzie.**

Brigard
Urrutia

DENTONS CARDENAS
& CARDENAS

Esguerra JHR
ANDERSEN.

Holland & Knight

RIMÔN

Silver



CUATRECASAS



Bronze



**forvis
mazars**



Pérez-Llorca,
Gómez-Pinzón



Reyes
Abogados.



SUPPORTED BY



Club El Nogal

November 13 - 14



Sincere thanks

Contact us

comunicaciones@ifacolombia.com

Tel. 304 2844634

www.ifacolombia.com

Follow us

 /company/ifa-colombia

 /ColombiaIFA

 /ifa_colombia

 @IFA_Colombia