

# WU – TA Advanced Transfer Pricing Programme 2024

## About the programme

The **WU – TA Advanced Transfer Pricing Programme** is offered by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business) and the Tax Academy of Singapore.

The 4-day programme is facilitated by professor from the WU Transfer Pricing Center and regional tax experts.

The programme provides participants with the latest update on international transfer pricing developments, and knowledge and insights to handle transfer pricing issues in specialised industries that are of relevance to the Asia-Pacific region. Workshops will be provided for all topics enabling opportunities for discussions.

## Target Group

The course is targeted at professionals from the industry, practice, government service, judiciary or academia, who want to deepen their knowledge in transfer pricing.

Participants should preferably have completed Tax Academy's Level 1 or Level 2 International Tax Programmes and have at least three years' of tax experience.

## Programme Structure

**Monday, 30 September 2024 (9 a.m. to 5 p.m.)**

**Introduction and Recent Transfer Pricing Developments at OECD/UN**

*Dr Raffaele Petruzzi*

**Transfer Pricing and Services**

*Ms Jow Lee Ying and Mr Zhang Zhitang*

**Tuesday, 1 October 2024 (9 a.m. to 4.30 p.m.)**

**Transfer Pricing and Financing**

*Dr Raffaele Petruzzi*

**Transfer Pricing and Intangibles**

*Dr Raffaele Petruzzi & Mr Stephen Bruce*

**Wednesday, 2 October 2024 (9 a.m. to 5.30 p.m.)**

**Business Restructurings**

*Mr Uziel Alvarez & Mr Carlo Navarro*

**OECD PE Definition and Profit Attribution**

*Ms Yong Sing Yuan*

**Common Issues and Challenges in Benchmarking**

*Mr Falgun Thakkar*

**Thursday, 3 October 2024 (9 a.m. to 5 p.m.)**

**Taxation of Digital Businesses**

*Mr Giammarco Cottani*

**Transfer Pricing in Consumer Goods Industry**

*Ms Lisa Zheng & Mr Vineet Rachh*

**Dispute Avoidance and Dispute Resolution**

*Ms Jow Lee Ying & Ms Ng Pei San*

*All timing indicated reflects Singapore time.*

*\*In the event the programme did not meet the minimum enrolment, TA will postpone it to 2025.*

## Programme Fee

The total programme fee is SGD 2,616 (incl GST).

Overseas participants, who in their business capacity belong overseas and are sponsored by overseas employers, will pay SGD 2,400 (excl GST).

## Photos & CV of trainers



**Dr. Raffaele Petruzzi, LL.M.**  
(Italy/Austria)

Dr. Raffaele Petruzzi, LL.M. is the Managing Director of the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business), the Founder and CEO of PETRUZZI Advisory, and an independent advisor on international tax and transfer pricing matters. He is also a member of the United Nations Subcommittee on Transfer Pricing. Raffaele gained extensive experience by working for many years within big four firms, international law firms, and in-house positions. He is a frequent speaker in international conferences and lecturer of numerous courses all over the world, as well as author of many publications. Amongst others, he is an editor of *Linde Transfer Pricing International Journal* and a member of the International Fiscal Association (IFA) and of Transfer Pricing Economists for Development (TPED). Raffaele holds a Ph.D. in International Business Taxation from WU, an LL.M. in International Tax Law from WU, and an M.Sc. in Business Administration and Law from Bocconi University.



**Ms Jow Lee Ying (Singapore)**

Lee Ying is a senior lecturer and faculty member of the Nanyang Technological University and Director of Ernst & Young Solutions LLP's tax practice based in Singapore. She has extensive experience in a wide spectrum of international tax work, such as transfer pricing consultations/audits, Advance Pricing Arrangements (APAs), Mutual Agreement Procedure (MAPs) and tax treaties. Prior to this, Lee Ying was with the Inland Revenue Authority of Singapore (IRAS), Economic Development Board (EDB) and the Ministry of Finance. She is well regarded for her international tax expertise and is a regular speaker at public tax seminars.



**Mr Zhitang Zhang (Singapore)**

Zhitang is a specialist in the field of transfer pricing at EY 10 years of experience and also an alumnus at the Singapore Management University School of Accountancy. His experience covers all areas of transfer pricing including global tax planning and controversy, tax supply chain and intellectual property advisory, tax governance as well as tax technology and transformation; both in Australia and Singapore. He has also taken up lecturing in classes organised by other membership bodies.



**Mr Stephen Bruce (Singapore)**

Stephen is a Partner in the Financial Services practice, focusing on banking and capital markets in EY Singapore. He has 28 years of experience in providing tax and transfer pricing advice in the financial services industry. Before joining EY, Stephen was the global head of transfer pricing for a global investment bank. He has been involved in the full spectrum of transfer pricing projects within an investment bank including the review of the global treasury function, sales, trading and execution functions of equities and fixed income businesses, investment banking deal origination & execution, shared service arrangements and headquarter service arrangements.



**Ms Lisa Zheng (Singapore)**

Lisa Zheng is Vice President of Taxes, Procter & Gamble. She is also Tax Committee Chair for TEL Asia Chapter. Lisa has 30 years of tax experience, most of which has been in the commercial sector including Oil and Gas, Healthcare and FMCG, with the first 12 years in the US and the last 16 in Asia (China and Singapore). Lisa has extensive experience in transfer pricing including Advance Pricing Arrangements and Mutual Agreement Procedures, tax controversies and mergers and acquisitions.



**Mr Vineet Rachh (Singapore)**

Vineet Rachh is Vice President – Taxes with Procter & Gamble, Singapore. He leads Asia Pacific, Middle East & Africa Tax. Prior to this role, he was based in P&G Switzerland for 5.5 years where he led Europe Transfer Pricing and Middle East Africa Tax. In his nearly 3 decades of career across Asia Africa and Europe, he has engaged with various tax authorities on numerous subjects, including APAs, MAPs and Tax Policies. He has also represented at the OECD and G20 Tax Summit. He is a member of several tax network groups and a regular speaker in Asia, Europe and Africa, including at the University of Lausanne, Switzerland.



**Mr Uziel Alvarez (UK)**

Uziel is a finance leader with 20 years of management, commercial, and leadership experience from tax advisory and in-house roles in London, New York, and Singapore. He is a trusted advisor and business partner in leading strategic and high-profile projects during transformative events such as business restructurings, divestitures, mergers and acquisitions, new market and product launches, and initial public offerings. Currently, Uziel is the Group Head of Tax for a London-based cloud banking technology company, where he leads the tax strategy and embeds a sustainable tax footprint for the business' rapid global expansion. Uziel is a published author, regular lecturer at the Tax Academy, and frequent speaker in international conferences on advanced tax and transfer pricing topics, emerging trends in international taxation, and digital technology solutions. Uziel holds a master's degree in International Tax from University of London, and has completed the Executive Leadership Programme from University of Oxford. He is a Certified Public Accountant, and a tax qualified professional in the UK and Singapore.



**Mr Carlo L. Navarro (Singapore)**

Carlo L. Navarro is currently Deloitte's SEA Transfer Pricing Leader based in Singapore and concurrently heads Deloitte's SEA Transfer Pricing Centre located in Manila, Philippines. He has over 25 years of experience as an International Tax and Transfer Pricing practitioner, assisting multinational companies in Southeast Asia. He has assisted clients in various phases of transfer pricing engagements, from planning and documentation to audit defense and negotiating Advance Pricing Arrangements (APAs) and Mutual Agreements (MAs). Through the TP Center in Manila, he has assisted clients in complying with their transfer pricing obligations globally and was also behind some of the successful complex transfer pricing audits and bilateral APA negotiations in SEA. As a recognized subject matter expert, he is published author in various international tax journals and local publications.



**Ms Yong Sing Yuan (Singapore)**

Sing Yuan is a Partner in Transfer Pricing with KPMG in Singapore. She has over 20 years of experience in tax policy, international tax and transfer pricing. She specialises in transfer pricing, dispute prevention and resolution for multinationals. Prior to joining KPMG, she was with the Inland Revenue Authority of Singapore where she headed the Transfer Pricing and Dispute Resolution Branch. She played an active role in bilateral negotiations to prevent and resolve transfer pricing issues for multinationals. Sing Yuan was also actively involved in domestic and international tax policy development. Sing Yuan is a regular speaker on global transfer pricing and tax policy. She has published a number of articles relating to topics in international tax and transfer pricing.



**Mr Falgun Thakkar (Singapore)**

Falgun is a Transfer Pricing Partner in PwC Singapore. Falgun has over 20 years of experience in transfer pricing. He has experience with advising multinational companies with their transfer pricing planning and defending their transfer pricing arrangements from Singapore, UK and India transfer pricing perspectives in audits, Mutual Agreement Procedures (MAPs) and Advance Pricing Arrangements (APAs). He has been involved in MAPs and APAs between Singapore and Japan / China / Taiwan / Indonesia / UK / India. He has also been involved in MAP between the UK and Japan during his stint in the UK firm. He is also a part of the Tax Controversy and Dispute Resolution team within PwC. Falgun has worked in various industries ranging from oil and gas, commodity trading, FMCG, industrial products, technology and food and beverages, and shipping and logistics. He is a commerce graduate and professional member of The Institute of Chartered Accountants of India. Additionally, he is also a member of the Singapore Institute of Accredited Tax Professionals.



**Mr Giammarco Cottani (Thailand)**

Giammarco Cottani is Head of Tax at Agoda - one of the world's fastest-growing online travel booking platforms, part of Booking Holdings Group - where he leads the Tax function. Previously, Giammarco worked as Director - Global Tax Policy at Netflix, where he spearheaded the tax public policy-related issues the group faces in the countries in which Netflix operates. Before that, Giammarco was a partner of the international tax law firm Ludovici Piccone & Partners, where he coordinated the international and transfer pricing practice. Giammarco received his degree in Law from LUISS Rome University in 2003, an LL.M. in European and International Taxation from the European Tax College in 2005, and a Ph.D. in Corporate Taxation from LUISS University in 2009.



**Ms Ng Pei San (Singapore)**

Pei San leads the Transfer Pricing and Dispute Resolution Branch in Inland Revenue Authority of Singapore (IRAS), which handles transfer pricing policy formulation, negotiation of Advance Pricing Arrangements and Mutual Agreement Procedures relating to transfer pricing issues with foreign tax authorities. She has experience in tax policy work and international taxation matters.

## How our past participants have benefitted...

### Ms Jillian Lim

*Executive Vice President, Singapore Economic Development Board*

The programme provided good insights into transfer pricing developments, with content that was current and relevant, and helped to draw out key issues for discussion. I especially appreciated that the speakers were able to deliver a mix of perspectives from academia, practitioner as well as private sector angles.

### Mr Samuel Soh

*Senior Transfer Pricing Adviser, Shell Singapore Pte Ltd*

I thoroughly enjoyed the WU-TA Advanced TP Programme 2023, as the programme not only provided grounding on the transfer pricing basics but also updates on the transfer pricing developments. A good mixed of speakers' profile also helped, as they were able to share different perspectives during the discussions on cases. It enabled me to walk away from the programme, having benefited from their insights and transfer pricing knowledge.

### Mr Matthew Peter Keats

*Investigator, Financial Markets Authority of New Zealand*

A very well-organised and comprehensive course, covering the technical aspects of transfer pricing in a post-BEPS world, complemented with great presentations by experts from academia and private practice, with ample opportunities to discuss ideas and concepts with fellow practitioners. A thoroughly enjoyable experience. Thank you again, Vienna University of Economics and Business and Tax Academy of Singapore!

### About Tax Academy of Singapore

The Tax Academy of Singapore is a not-for-profit institution set up by the Inland Revenue Authority of Singapore in collaboration with the international accounting firms – Deloitte & Touche, Ernst & Young, KPMG and PricewaterhouseCoopers, the Singapore Chartered Tax Professionals, the Institute of Singapore Chartered Accountants and the Law Society of Singapore. Tax Academy collaborates with leaders in the industry, academia and the government to develop and deliver structured tax training programmes, regular seminars and conferences that effectively raise the professional competency, knowledge and capabilities of the tax community.

### About the Institute for Austrian and International Tax Law

The Institute for Austrian and International Tax Law is one of the global leading tax academic institutions and is extremely active in the field of international taxation. As well as research and teaching activities, its staff participates in numerous national and international tax projects and over the years has developed an impressive network of contacts in more than 90 countries. The Institute's team comprises 60 academic staff members as well as many visiting professors and guest researchers from around the world.

### About WU Transfer Pricing Center

The WU Transfer Pricing Center ([www.wu.ac.at/taxlaw/institute/wutpc](http://www.wu.ac.at/taxlaw/institute/wutpc)) at the Institute for Austrian and International Tax Law aims at researching, analysing, debating, and teaching transfer pricing topics. Through its activities, it positions itself as a global institution providing the missing nexus between theory and practice in approaching transfer pricing topics. The Center combines both the academic and practical perspectives and its approach is highly international and interdisciplinary.

For more information on the **WU – TA Advanced Transfer Pricing Programme**, please contact

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