

I have more than 10 years of experience in transfer pricing compliance and advisory with an extended range of experiences in international tax, corporate tax, and indirect tax. In recent years, I put a strong focus on tax data and applying technology solutions to operational transfer pricing and other complex tax issues. I lead, design and implement innovative tax data-driven solutions to achieve efficiency, gain further insights, and identify tax risk and planning opportunities. I work with cross-functional partners globally in finance, treasury, legal and supply chain to ensure the implementation of tax projects. I rely on deep technical knowledge, and commercial skills gained from industry and practice experiences to build relationships with wider functions and deliver solutions.

## EXPERIENCES

### **UNILEVER**

**(London, UK)**

*Lead for Tax Innovation*

*5.2019 - present*

- Automate operation workflow to manage transfer pricing compliance, from planning to review and approve master file and local files;
- Design and build transfer pricing audit tracker and support tax audit cases using data analytics and knowledge graph model;
- Design and build transfer pricing methodology and policy database with global exception monitoring application;
- Design and implement global tax transformation projects (£1m+ p.a.) using in-house data lake (from SAP) to build detective, preventative and predictive tests on operational transfer pricing, VAT/GST, and withholding tax;
- Design and build intercompany contract database and review/approval processes;
- Build direct and indirect tax dashboards to identify tax risk and planning opportunities including CBCR analytics;
- Research complex tax issues (e.g. OECD BEPS 2.0 Pillar 1 and 2) and distil them to succinct technical memos;
- Build solutions to comply with specific local tax requirements (eg CFC assessor);
- Implement automatically tax classification machine learning model on purchase to pay business cycle at the invoice level;
- Develop and implement governance structure for machine learning and RPA tax models for tax risk management;
- Implement end to end automatic machine learning classification model for assigning HS code in the Philippines and Brazil;
- Develop and skill up tax teams to be data and technology literate by creating a learning curriculum and maintain tax technology community.

### **OMNICOM GROUP INC.**

**(London, UK)**

**(New York, US)**

*Global TP Senior Manager*

*1.2016 - 4.2019*

- Prepare, review and approve transfer pricing compliance obligations (both OECD and US 6662 compliant);
- Discuss and negotiate TP audits with tax authorities (HMRC, IRS, NTA, ATO, BZSt) to achieve optimal tax positions and conclude long-running audits;
- Working knowledge of US IRC under S482 and Treasury Regulations thereunder;
- Provide day to day advice on transfer pricing related issues to local agency CEOs and CFOs under US treasury regulations, or OECD guidelines e.g. service charges, cost-sharing, IP valuations and migrations, ASC 740 audit provision, and intercompany financial transactions;
- Provide tax advice on debt restructurings and thin capitalisation analysis;
- Efficient project and budget management to ensure deadlines are met;
- Mentor, motivate and manage juniors, and participate in recruitment processes.

**BDO LLP**  
**(London, UK)**  
**(New York, US)**

*Transfer Pricing Manager*  
5.2012 - 12.2015

- Design and prepare global and local TP documentation reports including value chain and business driver analyses, treasury TP on cash pooling, loans, insurance and guarantee fees;
- Lead TP planning projects under BEPS and US tax reform;
- Assist in drafting intercompany legal agreements tailored to specific transactions;
- Defend and support local international tax audits worldwide and model local risk exposure;
- Provide training and answer technical questions to clients;
- Identify, risk assess and present planning ideas to the international tax team, and M&A tax teams in relation to transfer pricing issues.

**MORGAN STANLEY**

*Commodity Product Controller*  
4.2011 - 5.2012

- Produce commodity trading P&L and explain trading risk exposure;
- Daily power forward curve validation and FX position reporting;
- Month-end processing e.g. TP implementation control, automation change;
- Manage administrative processes (e.g. cost centre code opening).

**KPMG LLP**

*Tax Assistant Manager*  
1.2007 - 4.2011

- Prepare TP documentation and thin capitalisation reports (2years);
- Prepare and review corporate tax returns, tax bookings (1.5years);
- Rotation program to audit (3m) and indirect tax teams (6m);
- Provide data analytics to senior tax partners (3m).

**SELECTED PROJECTS**

- Operational transfer pricing analysis (e.g. cost component analysis, profit split certification)
- Transfer pricing audit tracker and analytics engine
- CBCR data extraction and analytics
- Direct tax classification monitoring dashboard
- Transfer Pricing policy database and workflow app
- Indirect Tax Data Analytics
- Tax code machine learning auto-tagging
- HS code classification
- Global tax platform design
- Machine learning governance

**SKILLS**

- Microsoft Power Suite
- Python (Pandas, Scikit-Learn)
- Azure Databricks, Azure DevOps
- SAP finance module
- SQLite
- Large project management
- UI design and product management
- Microsoft Office and Collaborations
- Mandarin and Japanese
- Published translator

**EDUCATION**

**University of Nottingham**  
**United Kingdom**

*MSc in Economics (with merit)*                      2003 - 2005  
*Ph.D Candidate (with grant)*                      2005 - 2006

**University of International Business and Economics**  
**P.R. China**

*BSc in Economics (2:1 equivalent)*                      2000 - 2003

**QUALIFICATIONS**

**Chartered Accountant**                                      May 2010  
**Chartered Tax Advisor**                                      Mar 2010  
*First Time Passes, ICAS and CIOT, UK*

**Data Science**    Dec 2016  
*With Excellence, GENERAL ASSEMBLY, UK*  
**Machine Learning Engineering**                                      Jul 2018  
**Applied Data Science**    Dec 2019  
**Deep Reinforcement Learning**                                      May 2020  
**Natural Language Processing**                                      Aug 2020  
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