

# WU – TA Advanced Transfer Pricing Programme 2020

## About the programme

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

The 8 half-day programme is facilitated by a team of professors from the WU Transfer Pricing Centre and regional industry 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.

## Programme Structure

**Monday, 2 November 2020 (3 p.m. to 6 p.m.)**

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

*Dr Raffaele Petruzzi*

**Tuesday, 3 November 2020 (3 p.m. to 6 p.m.)**

**Transfer Pricing and Services**

*Prof Alfred Storck & Ms Jow Lee Ying*

**Wednesday, 4 November 2020 (3 p.m. to 6 p.m.)**

**OECD Pillar 1 and Global Businesses**

*Mr Sayee Prasanna*

**OECD PE Definition and Profit Attribution**

*Prof Alfred Storck*

**Thursday, 5 November 2020 (3 p.m. to 6 p.m.)**

**Transfer Pricing and Financing**

*Dr Raffaele Petruzzi*

**Monday, 9 November 2020 (3 p.m. to 6 p.m.)**

**Transfer Pricing and Intangibles**

*Prof Alfred Storck & Mr Stephen Bruce*

**Tuesday, 10 November 2020 (3 p.m. to 6 p.m.)**

**Transfer Pricing in Consumer Goods Industry**

*Ms Lisa Zheng & Mr Vineet Rachh*

**Value Chain Management and Business Restructurings**

*Ms Sharon Tan & Mr Uziel Alvarez*

**Wednesday, 11 November 2020 (3 p.m. to 6 p.m.)**

**Taxation of Digital Businesses**

*Mr Giammarco Cottani*

**Thursday, 12 November 2020 (3 p.m. to 6 p.m.)**

**Common Issues and Challenges in Benchmarking**

**Dispute Avoidance and Dispute Resolution**

*Ms Jow Lee Ying & Ms Yong Sing Yuan*

*\*In the event if the minimum enrolment number has not been reached, Tax Academy may postpone the programme to 2021.*

## Programme Fee

The total programme fee is SGD2,568 per participant. All fees include 7% Goods and Services Tax (GST). Overseas participants, who in their business capacity belong overseas and are sponsored by overseas employers, are excluded from paying 7% GST.



### Prof. Dr. Alfred Storck (Switzerland/Austria)

Alfred Storck is a Visiting Professor at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business) since April 2009. He is a member of the Board of Directors of the WU Transfer Pricing Center at that Institute.

Since the establishment of the Transfer Pricing Center in 2015 and till end 2017 Alfred Storck was Co-Managing Director of the Center. The focus of his research and teaching activities is International Business Taxation and Transfer Pricing.

From 2009 till January 2015, Alfred Storck has been working as Honorary Professor for Company Taxation and Managerial Finance at the Institute of Accounting, Controlling and Auditing (ACA) at the University of St.Gallen, Switzerland. Additionally, Alfred Storck was/is teaching in various LL.M./MBA programs in Austria, Germany, Liechtenstein and Switzerland. He is author of several publications on international tax and transfer pricing topics.

Alfred Storck is also acting as arbitrator in transfer pricing disputes (Tax Treaty cases).

Before his activities at both universities, Alfred Storck held various executive positions in a large multinational company headquartered in Switzerland.



### Dr. Raffaele Petrucci, LL.M. (Italy/Austria)

Raffaele Petrucci is the Managing Director of the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at Vienna University of Economics and Business (WU) and an international tax advisor specializing in international corporate taxation and transfer pricing at L&P Global (Vienna) and at Ludovici Piccone & Partners (Milan). Since 2007, Raffaele has gained relevant experience in international tax and transfer pricing, by working in different countries within Big 4 advisory firms and tax department of a multinational. Amongst others, he is a member of the United Nations Subcommittee on Article 9 (Associated enterprises: Transfer Pricing), of the International Fiscal Association (IFA), and of Transfer Pricing Economists for Development (TPED).

Raffaele holds a Master of Science degree in Business Administration and Law (major: Corporate Taxation) at Bocconi University (Italy), a Master of Laws degree (LL.M.) in International Tax Law at WU, and a Ph.D. in International Business Taxation at WU (thesis title: "Transfer Pricing Aspects of Intra-Group Financing").



### 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 Sayee Prasanna (India/Austria)

Sayee has over six years of experience in the field of transfer pricing and international taxation, comprising of roles in academia, tax policy and advisory. Currently, Sayee is a Teaching and Research Associate at the WU Transfer Pricing Center, Institute for Austrian and International Tax Law at the WU (Vienna University of Economics and Business).

Formerly, Sayee was a Policy Research and Advice Intern with the Tax Treaty, Transfer Pricing and Financial Transactions division at the Organization for Economic Cooperation and Development (OECD) in Paris. Sayee was also a Senior Consultant with EY India, involved in transfer pricing advisory, Advance Pricing Agreement (APA), documentations and litigation at various appellate forums.



### Mr Stephen Bruce (Singapore)

Stephen is a Partner in the Financial Services practice, focusing on banking and capital markets in EY Singapore. He has 22 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 is Vice President of Taxes for Asia, Procter & Gamble. She is also Tax Committee Chair for TEI Asia Chapter. Lisa has 26 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 14 in Asia (China and Singapore). Lisa has extensive experience in

transfer pricing including Advance Pricing Agreements and Mutual Agreements Procedure; tax controversies and mergers and acquisitions.



### Ms Sharon Tan (Singapore)

Sharon Tan joined Deloitte in January 2018 as an International Tax Partner based in Singapore and she is also on the firm's Global Value Chain Alignment (VCA) leadership network. She supports the firm's global clients with investments in the Asia Pacific region. Sharon has over 24 years of MNC

industry experience primarily in chemicals, technology and consumer brand. She sat on the Curriculum & Examination Development (CED) Committee for the Tax Academy of Singapore and the GST Committee of the Singapore Institute of Accredited Tax Professionals (SIATP). She also participated as an appointed member of the Taxpayers Feedback Panel organised by the Inland Revenue Authority of Singapore (IRAS). Sharon was also a board member representative of the Tax Executive Institute (TEI) Asian Chapter.



### Mr Uziel Alvarez (Singapore)

Uziel Alvarez is a Director in the global transfer pricing practice of Deloitte, with over 15 years of experience from London, New York, and Singapore. He is a trusted advisor in developing holistic strategies and practical solutions to complex technical transfer pricing issues, and in aligning the tax footprint of multinational groups with their operating

models. He works with clients in designing, documenting, and defending their transfer pricing approaches. Uziel is a frequent speaker in international conferences and seminars on advanced international tax topics, emerging issues and trends in transfer pricing, and tax technology solutions. He also leads the transfer pricing training programme of Deloitte in Southeast Asia and is a lecturer / examiner on the advanced tax programme of the Tax Academy of Singapore.



### Ms Yong Sing Yuan (Singapore)

Ms Yong Sing Yuan is currently in charge of mutual agreement procedures relating to transfer pricing issues and advanced pricing arrangements. She has experience in tax policy work and international taxation matters. Sing Yuan is the course advisor for the International Tax Programme conducted by the Tax Academy. She has also contributed to external journals

such as the Bulletin for International Taxation by IBFD.

## Past Programme Participants

### 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 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 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 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

**Ms Eunice Toh**

Senior Programme Executive  
Tax Academy of Singapore

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