#### Phalguni Sharma

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#### **Professional Summary**

- Overall 8+ years of Direct Taxation experience including Transfer pricing, corporate taxation and international taxation advisory and audits.
- 3.5 years of articleship training while studying to become a Chartered Accountant in direct taxation corporate taxation, individual and partnership firm taxation.
- Represented several clients before Income Tax Appellate Tribunal court (ITAT -public forum).
- Assisted counsel by providing knowledge transfer and helping build cases to represent multinational clients to challenge Income Tax authority orders in court, and got favourable outcomes for clients.
- Provided advisory in relation to transfer pricing matters considering transfer pricing Indian regulations and Base erosion and profit shifting (BEPS) requirements as part of large advisory engagements
- Evaluated intercompany pricing arrangements between related business entities with respect to transfer of intellectual property, transfers of tangible goods, services and loans, and other financing transactions.
- Worked with clients belonging to APAC, NA and EU regions in IT, ITeS (SaaS), Pharma sectors and manufacturing sectors.

#### **Key Competencies, Certifications and skills**

- Domain Knowledge: Direct Tax including audits Transfer Pricing, Corporate and international Tax
- Certifications: Certified Chartered Accountant by Institute of Chartered Accounts India (ICAI)
- Tools: MS Excel, Word, PowerPoint
- Transfer Pricing databases Capital Line, RoyaltyStat, ktMINE, AceTP and Prowess

#### **Professional awards / Recognitions**

- Awarded 'Live the Dot' award for maintaining excellent client relationship in Deloitte Haskins & Sells LLP.
- Nominated and was part of Driwe programme conducted for women leadership in Deloitte Haskins and Sells LLP.

#### **Professional Experience**

2022-Apr To Present	Grant Thornton LLP, Canada
	Senior Analyst, Transfer Pricing
	Worked as a Senior Analyst, where I was responsible for the following:
	<ul> <li>Preparation and review of Transfer pricing documentation as per OECD, U.S. and Canadian TP regulations.</li> </ul>
	Provided advisory and recommendations on related party transactions.
	Assisted client in implementing new transfer pricing policies.
	<ul> <li>Undertook benchmarking analysis and market comparability analysis for related party transactions.</li> </ul>
	Performed financial analysis for the purpose of TP documentation.
	Identified and analysed new/existing related party transactions.
	Reviewed Group's master file.
	Computed year-end transfer pricing adjustments for the client.
	Reviewed T106 Forms.
	Provided on the job trainings to junior colleagues.
	Deloitte Haskins & Sells LLP, India
	Deputy Manager – Transfer Pricing
2015-Feb	As a manager I was handling 11 clients and a team of 4 members. I have worked with leading
То	manufacturing companies and IT firms; helped them stay compliant with respect to Transfer
2021-Apr	Pricing laws applicable to them. My responsibilities towards my clients were as follows:
	<ul> <li>As part of building the transfer pricing study for all my clients, I performed the following activities:</li> </ul>

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	<ul> <li>Understanding the client's business operations and identifying the</li> </ul>
	intercompany transactions entered with associated enterprises.
	<ul> <li>Performing Function, Asset and Risk (FAR) analysis of client companies</li> </ul>
	<ul> <li>Search for potential internal and external comparables</li> </ul>
	<ul> <li>Selecting most appropriate method and extracting information for transfer</li> </ul>
	pricing analysis from databases
	<ul> <li>Review of transfer pricing study and form 3CEB.</li> </ul>
	<ul> <li>Provided audit support.</li> </ul>
	<ul> <li>Preparation of submissions and representation before income tax authorities</li> </ul>
	and Income Tax Appellate Tribunal (ITAT). Representing the client before
	appellate authorities including ITAT and also received favourable outcome in 4-
	5 clients.
	<ul> <li>Undertook quarterly review of profit and loss account and cost plus working of various</li> </ul>
	companies.
	<ul> <li>Providing advisory in relation to India TP regulations, OECD and BEPS regulations and</li> </ul>
	also conducting analysis of various business models.
	Advising the client on advance pricing agreements and assisting them in preparation and
	filing of the application for advance pricing agreement and Master File and Country-by-Country reporting compliances.
	<ul> <li>Preparation of Transfer pricing report for foreign companies based in USA, Netherlands,</li> </ul>
	Singapore.
2012-Nov	Nov 2012 to Jan 2015 - NNMS & Co, India
То	Worked as the tax associate where I was responsible for Transfer pricing, corporate taxation and
2015-Jan	international taxation.
2008-Apr	Apr 2008 to Sep 2011 - H.C. Khincha & Co (Internship/Articleship)
То	Worked as the Article assistant where I was responsible for Direct Taxation and Audits
2011-Sep	

### Education

2008 to	Institute of Chartered Accounts of India
2012	Chartered Accountancy Course – CA
2007 to	Sri Bhagawan Mahaveer Jain College, Bengaluru India
2010	Bachelors of Commerce
2005 to	Mount Carmel College, Bengaluru India
2007	Higher Secondary (Class XII)