

# WU – TA Advanced Transfer Pricing Programme 2021

## 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 8 half-day programme is facilitated by a team of professors from the WU Transfer Pricing Center and regional tax experts.

The programme provides participants with the latest updates on transfer pricing developments on the international front, and knowledge and insights for handling transfer pricing issues in specialised industries within the Asia-Pacific region. Discussions on all topics will be facilitated by the relevant experts, providing ample opportunities for rich discourse.

## 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, 6 September 2021 (3 p.m. to 6 p.m.)**  
**Introduction and Recent Transfer Pricing Developments at OECD/UN**  
*Dr Raffaele Petruzzi*

**Tuesday, 7 September 2021 (3 p.m. to 6 p.m.)**  
**Transfer Pricing and Services**  
*Prof Alfred Storck & Ms Jow Lee Ying*

**Wednesday, 8 September 2021 (3 p.m. to 6 p.m.)**  
**OECD Pillar 1 and Global Businesses**  
*Mr Sayee Prasanna*

**OECD PE Definition and Profit Attribution**  
*Dr Raphael Holzinger*

**Thursday, 9 September 2021 (3 p.m. to 6 p.m.)**  
**Transfer Pricing and Intangibles**  
*Prof Alfred Storck & Mr Stephen Bruce*

**Monday, 13 September 2021 (3 p.m. to 6 p.m.)**  
**Transfer Pricing and Financing**  
*Dr Raffaele Petruzzi*

**Tuesday, 14 September 2021 (3 p.m. to 6 p.m.)**  
**Business Restructurings**  
*Mr Uziel Alvarez & Ms Krisma Bhalla*

**Common Issues and Challenges in Benchmarking**  
*Ms Jun Liu*

**Wednesday, 15 September 2021 (3 p.m. to 6 p.m.)**  
**Taxation of Digital Businesses**  
*Mr Giammarco Cottani*

**Thursday, 16 September 2021 (3 p.m. to 6 p.m.)**  
**Transfer Pricing in Consumer Goods Industry**  
*Ms Lisa Zheng & Mr Vineet Rachh*

**Dispute Avoidance and Dispute Resolution**  
*Ms Jow Lee Ying & Ms Yong Sing Yuan*

*\*In the event the programme did not meet the minimum enrolment, TA will postpone it to 2022.*

## Programme Fee

The total programme fee is SGD 2,568 (incl GST).

Overseas participants, who in their business capacity belong overseas and are sponsored by overseas employers, will pay SGD2,400 (excl GST).

## Programme Trainers



**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)

Dr. Raffaele Petrucci, 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) and an international tax advisor specializing in international corporate taxation and transfer pricing. Since 2007, Raffaele has gained extensive experience in dealing with topics related to international corporate taxation and transfer pricing, both from a professional and an academic perspective. He is a frequent speaker in international conferences and lecturer of numerous courses (in Europe, Asia and Latin America), as well as author of many publications on international tax and transfer pricing topics. He regularly cooperates with professionals in advisory, the business community, governments and international organizations (e.g. OECD, United Nations, World Bank Group, International Monetary Fund, and European Commission). In addition, 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.



**Ms Jow Lee Ying** (Singapore)

Lee Ying is a senior lecturer and faculty member of the Nanyang Technological University and Director of EY'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.



**Dr. Raphael Holzinger** (Austria)

From an academic perspective Dr. Raphael Holzinger is a post-doctoral research and teaching fellow at the Institute for Austrian and International Tax Law at Vienna University of Economics and Business and constantly conducts research in the areas of transfer pricing, business tax law and international tax law and is a frequent speaker on those topics in professional and academic courses, workshops and conferences. He also frequently publishes articles in national as well as international journals and books. From a business perspective he is a Certified Tax Advisor as well as a Certified Transfer Pricing Manager and works for Deloitte Vienna, Austria. His practical focus lies on consultancy in the areas of transfer pricing, business tax law and international tax law. In that regard Dr. Holzinger manages client engagements, designs, prepares and defends transfer pricing settings, advises in cross-border tax planning situations, supports clients with different documentation tasks and has extensive experience in the area of transfer pricing dispute resolution (transfer pricing audits, unilateral and bilateral APAs as well as MAPs).



**Mr Stephen Bruce** (Singapore)

Stephen is a Partner in the Financial Services practice, focusing on banking and capital markets in EY Singapore. He has more than 20 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 TEI Asia Chapter. Lisa has 27 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 15 in Asia (China and Singapore). Lisa has extensive experience in transfer pricing including Advance Pricing Agreements and Mutual Agreement Procedures, tax controversies and mergers and acquisitions.



**Mr Vineet Rachh** (Switzerland)

Vineet Rachh is Vice President – Taxes with Procter & Gamble. He leads Asia Middle East & Africa tax for P&G. He has just returned from a 5.5 years assignment at P&G's European HQ where he was responsible for Europe Business Model/Transfer Pricing and MEA tax matters. In his 27 years career, he has engaged with numerous tax authorities on various subjects, including APAs, MAPs and tax policy. He has also represented at OECD's Task Force on Tax and Developments Sub-Group on Transfer Pricing, the G20 Tax Summit and the African Tax Authorities Federation. He is a member of several tax network groups and a regular speaker at conferences in Europe, Asia and Africa including at the University of Lausanne, Switzerland.



**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 is a dean for the transfer pricing training programme of Deloitte in Asia Pacific and is a regular lecturer on the advanced tax programme of the Tax Academy of Singapore.



**Ms Krisma Bhalla** (Singapore)

Krisma is an International Tax Director in Singapore and has been with Deloitte for over 14 years, including having spent over 10 years with Deloitte UK. She has been focused on the delivery of a wide range of complex cross-border projects for Multinational companies, including complex tax advisory, tax due diligence and structuring, post-acquisition structuring, corporate reorganisations, corporate simplifications and tax audits and compliance. She has also been focused on advising clients in the region on changes in the International Tax Environment arising from the OECD's Base Erosion and Profit Shifting ("BEPS") project. Krisma graduated with an Economics degree from University College London (UCL) and is a member of the Institute of Chartered Accountants in England and Wales (ICAEW) and The Chartered Institute of Taxation (CIOT).



**Mr Giammarco Cottani** (Italy)

Giammarco Cottani is Director of Global Tax Policy at Netflix, where he oversees all direct and indirect tax public policy-related issues the group faces in the countries in which Netflix operates. From 2015 to 2019, Giammarco was a partner of the International tax law firm Ludovici Piccone & Partners. He coordinated the international and transfer pricing practice with regard to both the prevention and resolution of domestic and international disputes and assistance in complex audits for large multinational enterprise groups. Giammarco was recently involved in several ongoing technical assistance projects for three EU Member States tax administrations, mainly in transfer pricing, attribution of profit by using permanent establishments, and aggressive tax planning. Furthermore, he regularly lectures at postgraduate courses in International Taxation in Europe.



**Ms Jun Liu** (Germany)

Jun Liu is a senior manager in the service line Transfer Pricing - International Tax and Transaction Tax Services in Ernst & Young's Frankfurt/Eschborn office in Germany. She started working for Ernst & Young in 2009 in transfer pricing and has more than 10 years of experience in supporting multinational clients in the areas of transfer pricing documentation, planning, cross-border restructuring and controversy. Jun holds a computer science from the Technical University of Darmstadt (Germany, 2009) and now she is leading a project of developing a global benchmarking tool for Ernst & Young.



**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.

## 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 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*

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Tax Academy of Singapore

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