



Institute for Austrian and
International Tax Law **Vienna**
WU Transfer Pricing Center



WU - TA **Advanced** **Transfer Pricing** **Programme 2026**



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 professors from the WU Transfer Pricing Center 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.

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

28 Sep 2026, Monday (9.00 A.M – 5.00 P.M)

Introduction/Recent TP Developments at OECD/UN
Dr Raffaele Petruzzi

TP and Services

Ms Jow Lee Ying & Mr Zhang Zhitang

30 Sep 2026, Wednesday (9.00 A.M – 7.30 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

**Technical Session/Fireside Chat
(6.00 P.M – 7.30 P.M)**

29 Sep 2026, Tuesday (9.00 A.M – 5.00 P.M)

TP and Financing
Dr Raffaele Petruzzi

TP and Intangibles
Mr Richard Goh & Mr Stephen Bruce

1 Oct 2026, Thursday (9.00 A.M – 5.30 P.M)

Taxation of Digital Businesses
Mr Giammarco Cottani

TP in Consumer Goods Industry
Mr Vineet Rachh

**Dispute avoidance (e.g., rulings and APA) and
Dispute Resolution (e.g., MAP and arbitration)**
Ms Jow Lee Ying & Ms Ng Pei San

PROGRAMME FEE

- Early Bird: SGD 2,092.80 (incl GST) *in-person*
- Virtual Option: SGD 1,962 (incl GST)
- Standard Rate: SGD 2,616 (incl. GST) *in-person*

Modular Registration Available:

Fee per module (per day): SGD 654 (incl GST)

Overseas participants, who in their business capacity belong overseas and are sponsored by overseas employers, will pay SGD 1,920 (Early Bird)/ SGD 1,800 (Virtual Option)/ SGD 2,400 (excl GST) for full programme.

Programme Overview

28 Sep 2026, Monday

AM Session

Dr Raffaele Petruzzi

Introduction/Recent TP Developments at OECD/UN

- The importance of transfer pricing
- Different approaches to transfer pricing
- The arm's length principle
- The legal framework to the arm's length principle
- The application of the arm's length principle

PM Session

Ms Jow Lee Ying & Mr Zhang Zhitang

TP and Services

- TP and Services (OECD/UN)
- Shareholder activities
- Benefit test
- Low-Value Adding Services (LVAS)
- Shared Service Centres

30 Sep 2026, Wednesday

AM Session

Mr Uziel Alvarez & Mr Carlo Navarro

Business Restructurings

- Overview and Framework of Business Restructurings
- Key Principles and Transfer Pricing Considerations
- Court Rulings, including Conversion and Exit Tax Cases

PM Session

Ms Yong Sing Yuan

OECD PE definition and Profit Attribution

- PE definition (OECD/UN)
- Profit Attribution (OECD/UN)
- Case study on Profit Attribution
- Article 7 vs Article 9

Mr Falgun Thakkar

Common issues and challenges in benchmarking

- Dos and Don'ts in identifying TP methodologies
- Dos and Don'ts in identifying external comparables
- Challenges of data availability and BM analysis post-COVID

Technical Session/Fireside Chat

29 Sep 2026, Tuesday

AM Session

Dr Raffaele Petruzzi

TP and Financing

- New Guidance (OECD/UN)
- Finance companies and Functional Analysis
- Loans
- Guarantees
- Cash Pooling

PM Session

Mr Richard Goh

TP and Intangibles

- Key TP Issues for Intangibles
- Step-by-Step Breakdown of the Six-Step Framework for Analysing Intangibles
- Comparative Case Law Insights
- Tax Administrations' Approaches
- Practical Takeaways

Mr Stephen Bruce

TP and Intangibles

- Workshop

1 Oct 2026, Thursday

AM Session

Mr Giammarco Cottani

Taxation of Digital Businesses

- Typical business models of digital businesses (incl. practical examples)
- The current issues in taxing digital businesses
- How will the taxation of digital businesses change after the current discussions at the international level?
- How will MNEs' structures change to react to the new changes?

Mr Vineet Rachh

TP in Consumer Goods Industry

- TP in a MNE (challenges and practical solutions)
- TP issues with a Principal Structure
- Pros/Cons of APAs to get tax certainty

PM Session

Ms Jow Lee Ying & Ms Ng Pei San

Dispute avoidance (e.g., rulings and APA) and Dispute Resolution (e.g., MAP and arbitration)

- OECD developments and MLI
- APA and Dispute resolutions
- Practice in Singapore

Trainers



**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), 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), of the International Bar Association (IBA), 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 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. Sing Yuan holds a Master of advanced studies Cum Laude in International Tax Law, Leiden University. She is also an Accredited Tax Advisor (Income Tax) with the Singapore Chartered Tax Professionals Limited.



**Ms Jow Lee Ying
(Singapore)**

Lee Ying is a senior lecturer at the Nanyang Technological University and Director of EY Singapore's transfer pricing practice in Singapore. She has

extensive experience in a wide spectrum of international tax work, such as transfer pricing audits, Advance Pricing Arrangements (APAs), Mutual Agreement Procedures (MAPs) and tax treaties. Prior to this, Lee Ying was with the Inland Revenue Authority of Singapore (IRAS), the Singapore Economic Development Board and the Singapore Ministry of Finance. She holds a Master of International Taxation from the University of Sydney and has published a number of journal articles on transfer pricing. Lee Ying is well regarded for her international tax expertise and is a regular speaker at public tax seminars.



**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 Agreements (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 Uziel Alvarez (UK)

Uziel is a high-impact global tax leader with over 20 years of experience across London, New York, Manila, and Singapore. He specialises in guiding tax strategy through international expansions, M&A, restructurings, IPO readiness, and operating

model transformations. A trusted advisor to executives, he builds scalable tax structures, strengthens governance, and supports hypergrowth businesses through change. Based in London, he is the Global Head of Tax at a FinTech scale-up, responsible for tax strategy, governance, and the Group's operating model. Uziel is also an international speaker and published contributor on advanced tax topics. He holds a Master's in Taxation from the University of London and is dual-qualified in accounting and tax.



**Mr Richard Goh
(Singapore)**

Richard is a Group Tax Specialist at the Inland Revenue Authority of Singapore.

He is a Chartered Valuer and Appraiser and a certified Master Tax Specialist in IP Law, IP Management and IP Commercialisation. He has over 10 years of experience dealing with tax and transfer pricing valuation issues involving acquisitions and transfers of IP and other intangibles across various sectors. He also speaks regularly in seminars and workshops and has written articles on the valuation of intangibles for accounting, tax and transfer pricing purposes.



**Mr Vineet Rachh
(Singapore)**

Vineet Rachh currently leads Taxes for the Asia Pacific, Middle East, and Africa at Procter & Gamble. He is an Accomplished Tax Leader with over 30 years of experience across Asia Pacific, Europe, and Africa. He specializes in areas such as Advance Pricing Agreements, Mutual Agreement

Procedures, Tax Controversy, and International Taxation. As a recognized authority in the field, Vineet has represented at prominent global tax forums, including the OECD, G20, and the African Tax Administration Forum. His insights have contributed to shaping meaningful dialogues on transfer pricing, international taxation, and tax policy matters. Vineet is a sought-after speaker at international tax conferences and academic programs. He has delivered sessions at prestigious institutions, including the University of Lausanne (Switzerland), WU (Vienna University), and the Tax Academy of Singapore. He is also a Member of the Curriculum & Examination Committee at the Tax Academy of Singapore.



**Mr Giammarco Cottani
(Abu Dhabi)**

Giammarco Cottani is the Founding Partner of NOEMA Global Tax and Policy, a boutique tax and policy firm rooted in excellence and driven by innovation and impact, with offices in Abu Dhabi and Amsterdam. With over 20 years of experience spanning international

organizations, governments, and private sector roles, he brings deep expertise in international taxation, policy development, and strategic advisory. His core competencies include tax structuring, international tax law, corporate law, and transfer pricing. He is passionate about developing innovative and tax-compliant solutions that anticipate and mitigate risks from both financial and reputational perspectives.



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

Carlo L. Navarro is Deloitte Philippines's Head of Tax and Deloitte Southeast Asia's Transfer Pricing Leader.

He is also a member of the Global Transfer Pricing Executive Committee of Deloitte. He 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 across Southeast Asia. He is an alumnus of the University of the Philippines College of Law and Harvard Law School, Harvard University where he completed his international tax studies.



**Mr Zhitang Zhang
(Singapore)**

Zhitang is a tax practitioner specialising in the field of transfer pricing with at EY and now an international tax senior manager with FrieslandCampina. He is also an alumnus at the Singapore Management University School of Accountancy.

His experience covers all areas of tax 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 30 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 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...

“ 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.

Ms Jillian Lim

Executive Vice President, Singapore Economic Development Board

“ As a course participant many years ago, I found the programme content to be comprehensive and engaging. The course trainers were knowledgeable and passionate, always providing valuable insights and feedback. As a course trainer now, I am committed to share with you practical knowledge and real world examples to help you navigate the world of dispute resolution. You will be part of a learning community where you can share your experiences, ask questions and interact with like-minded individuals.

Ms Ng Pei San

Tax Director, Inland Revenue Authority of Singapore

“ The WU-TA Advanced Transfer Pricing Programme 2025 provided a comprehensive and well-structured overview of contemporary transfer pricing issues, with content that was both current and highly relevant to practice. The programme effectively combined academic rigor with practical insights, allowing for meaningful discussions on emerging developments and complex technical matters. I particularly valued the diversity of perspectives shared by the faculty and speakers, who brought together viewpoints from academia, professional practice, and the private sector. This balanced approach significantly enhanced the learning experience and made the programme directly applicable to real-world transfer pricing challenges.

Mr Mutukwa Sikopo

Tax Appeals Officer, Zambia Revenue Authority

About Tax Academy of Singapore

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 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) 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 Tiffany Tan

Programme Manager

Tax Academy of Singapore

tiffany_tan@iras.gov.sg

Website: www.taxacademy.sg

Website: www.wu.ac.at/taxlaw