



Neeraj Sharma

Transfer Pricing Professional

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Profile

Objective	Seeking opportunity in Transfer Pricing advisory services with prospects for professional and personal growth
Overview	<ul style="list-style-type: none">• Experience of 6.5 years in Transfer Pricing ('TP') and Investment Banking services• Well versed with BEPS, OECD guidelines, UN TP manual and Model Tax Convention• Handled assignments of Advance Pricing Agreements ('APA'), International Taxation advisory, TP advisory, business restructuring, compliance & litigation of > 60 MNC clients operating in E-commerce, IT/ITES, auto components, clinical research, FMCG, private equity advisory and medical transcription industry in KPMG and Grant Thornton India LLP• Knowledge of working on private equity, strategic growth advisory and debt syndication assignments in a boutique investment bank• In-depth knowledge of international databases (The Bureau Van Dijk's ('BVD') Osiris, BVD Amadeus, BVD ORBIS, IBFD, One Source, Factiva, Data Monitor, RoyaltyStat, ISI Emerging Markets and Lexis Nexis) and Indian databases (Prowess, Capitaline Plus, ACE and Crisil)

Work Experience

B S R & Co. LLP (KPMG) August 2015 - Present	<ul style="list-style-type: none">• Assisting in APA proceedings along with transfer pricing related litigation matters before various levels of Indian Revenue Authorities• Preparation of audit appeal documents and other reference materials based on domestic and international TP judgments'• Preparation of readiness report w.r.t Action Plan 13 – CbC of BEPS for India's parent entity listed (Leading e-com operating as Online Travel Agent) at NASDAQ
Grant Thornton India LLP ('GT India') August 2011 - April 2013 and August 2014 – July 2015	<ul style="list-style-type: none">• Handling assignments in the nature of TP regulatory compliance, advisory and assisting the MNC clients in representation before the Indian Revenue Authorities• Assessing the TP risk exposure by preparing limited review Fin48 compliance reports• Assisting Indian Groups in formulating robust Transfer Pricing guidance manual for undertaking intercompany transactions at arm's length
Avancer Capital Partners Private Limited May 2013-August 2014	<ul style="list-style-type: none">• Strategic growth advisor to a venture (initiated by Northern India based group with turnover of• > USD 200 mn in white goods manufacturing) in solar powered home lighting solutions• Preparing confidential documents (like investment memorandum, pitch book, teaser, customized industry / advisory reports)• Deal scouting by conducting search on various databases
KPMG April 2010 – April 2011	<ul style="list-style-type: none">• Evaluating & documenting the functions, assets and risks ('FAR') of international transactions to assess the tax implications arising due to cross-border related party transactions• Undertaking benchmarking analysis, preparing industry overview, drafting TP reports and statutory compliance document i.e. Accountant's Report ("Form 3CEB")

Key Assignments	
Transfer Pricing	<ul style="list-style-type: none"> Executed Global TP report (covering China, Hong Kong, India, Malaysia, Singapore and Thailand) for one of the fastest growing Indian MNC operating in Logistics industry ~ Visited Hong Kong along with GT India's Transfer pricing partner for conducting FAR analysis Selected for 2 years secondment opportunity with Grant Thornton ('GT') Thailand Assisted GT's Uganda team to establish TP practice in Uganda by preparing pitch packs, exhaustive TP FAR questionnaire and TP reports guiding materials Assisted GT USA in pitching for global TP services to one of the world's biggest Agro based company by providing research services for 22 geographical locations Assisted GT's Israel team in pitching clients for India based groups / clients Prepared comprehensive TP manual for India's one of the largest and listed auto components manufacturer (Turnover > USD 740 mn) Prepared and suggested the most appropriate business restructuring model(s) for Singapore based IT company (e-commerce apps development) slated for NASDAQ listing
Private Equity	Preparation of investment memorandum for the following deals: <ul style="list-style-type: none"> USD 50 mn PE for India's one of the largest Pharma contract manufacturer USD 42 mn PE for India's largest white goods contract manufacturer
M&A	Identification of investor for India's largest knitwear manufacturer based out of South India
Strategic Advisory Reports	<ul style="list-style-type: none"> Prepared detailed report on market potential of helicopters and private charters in India for civil aviation Detailed report on investment opportunities in private dental practice in London (Note: Based on this report, client sourced USD 12 mn funding from London based investor)
Corporate Internship: Power Finance Corporation (18 May – 24 Jul 2009)	Analyzed the need for regulation and supervision of risk management in the form of Basel norms and projected capital adequacy requirements of Power Finance Corporation for FY 2009-14
Social Internship: INTACH, Delhi (15 Dec – 3 Jan 2008)	To suggest a road map of making Delhi as a "Heritage City"- Identified and interpreted the need of services like cycles on hire, audio guides and site literature on potential heritage routes and assessed the conditions of Basic Amenities available at heritage sites
Education	
Chartered Institute of Taxation (CIOT), UK Pursuing	The Advanced Diploma in International Taxation
JIIT University, Noida 2008 – 2010	MBA - International Finance (Secured CGPA of 9 out of 10)
Zakir Hussain College, Delhi University 2004 – 2007	Bachelors in Economics Hons.
Personal Info.	
Awards	<ul style="list-style-type: none"> Won multiple prizes (in Badminton and Soccer) in Grant Thornton India's sports fest in 2013 and 2015 1 prize in NIVESH – Equity Research Inter B-School Management competition held in Jaipuria Institute of Management, NOIDA on 4 December 2009 1 prize in Intra College Paper Presentation on – "Vidarbha – Farmers' crying held in Zakir Husain College, Delhi University, (2006-07)
Interests	<ul style="list-style-type: none"> Photography, Travel and listening to music