

# WU – TA Advanced Transfer Pricing Programme 2019

## 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 four-day programme is facilitated by a team of professors from the WU Transfer Pricing Centre and regional tax experts from international advisory firms, industry and tax administrations.

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.

**A great opportunity to network with TP experts from academic and industry both local and overseas. Sign up now to enjoy the early-bird rate!**

## Who should attend

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 have at least three years' tax experience and basic knowledge of transfer pricing, equivalent to Tax Academy's Level 1 (International Tax) Executive Tax Programme.

## Programme Structure

### Monday, 30 September 2019

#### Introduction/Recent Transfer Pricing Developments at OECD/UN

*Dr Raffaele Petruzzi*

#### OECD PE definition and Profit Attribution

*Prof Alfred Storck*

### Tuesday, 1 October 2019

#### Transfer Pricing and Services

*Prof Alfred Storck & Ms Jow Lee Ying*

#### Transfer Pricing and Financing

*Dr Raffaele Petruzzi*

### Wednesday, 2 October 2019

#### Transfer Pricing and Intangibles

*Prof Alfred Storck & Mr Stephen Bruce*

#### Transfer Pricing in Commodities and Resource Industry

*Ms Susan Hinton*

#### Transfer Pricing in Consumer Goods Industry

*Ms Lisa Zheng & Ms Elizabeth Quiroz*

### Thursday, 3 October 2019

#### Dispute Avoidance and Dispute Resolution

*Ms Jow Lee Ying & Ms Yong Sing Yuan*

#### Value Chain Management and Business Restructurings

*Ms Sharon Tan*

#### Transfer Pricing under UN TP Manual 2017

*Mr Ostwal T.P.*

## Programme Fee

Total Programme Fee: **SGD 3,103 (incl GST)**

Early Bird Fee\*: **SGD 2,782 (incl GST)**

Lunch and tea breaks will be provided.

\* *Applicable to participants who registered and paid in full on or before 30 Jun 2019*

*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. Refreshments and lunch will be provided throughout the 4 days of the programme.*

## Advanced Level International Tax Training Programmes offered by Tax Academy:

### Executive Tax Programme Level 3 - International Tax

Leiden - TA  
Advanced Tax  
Treaties  
Programme

WU - TA  
Advanced  
Transfer Pricing  
Programme

Advanced  
International  
Tax Planning  
Programme



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

Alfred Storck is Co-Chair of the Board of Directors of the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business). Since the establishment of the Transfer Pricing

Center in 2015 and till end 2017 Alfred Storck was Co-Managing Director of the Center.

Alfred Storck has been a Visiting Professor at the Institute since April 2009. 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. The focus of his research and teaching activities in St.Gallen has been International Business Taxation, Transfer Pricing and Managerial Finance.

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 and acting as co-editor of the journal "Transfer Pricing International" (published by Linde /Otto Schmidt). 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.

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 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 Susan Hinton (Australia)

Susan has 18 years of experience working on transfer pricing matters and is currently Principal Advisor, Transfer Pricing at Rio Tinto, one of the world's largest mining companies. Susan has significant experience on technical transfer pricing matters and in dealing with tax authorities, with both a Big 4 accountancy firm and corporate background. Prior to that, Susan worked as an economist in banking and government sectors.



### Ms Lisa Zheng (Singapore)

Lisa is Tax Director for Asia, Procter & Gamble. She is also Tax Committee Chair for TEI Asia Chapter. Lisa has 25 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 13 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 Elizabeth Quiroz (Singapore)

Elizabeth has more than 18 years of experience working on corporate finance in Procter & Gamble (P&G). Since July 2015, she is the Associate Director, Asia Tax & Transfer Pricing, P&G. Prior to that, Elizabeth had several roles within P&G Latin America that included tax and accounting, sales finance, product supply finance and financial planning.



### 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.



### Ms Sharon Tan (Singapore)

Sharon Tan joined Deloitte in January 2018 as an International Tax Partner based in Singapore. 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 organized by the Inland Revenue Authority of Singapore (IRAS). Sharon was also a board member representative of the Tax Executive Institute (TEI) Asian Chapter.



### Mr T.P. Ostwal (India)

T.P. Ostwal is a Senior Partner in T. P. Ostwal & Associates LLP, Chartered Accountants and is based in Mumbai. Having experience of more than four decades in practice, he advises national and multinational clients engaged in a diverse range of businesses, including construction & infrastructure, chemicals, shipping, manufacturing, information

technology, pharmaceuticals etc. He is and has been an Independent Director on the Board of various companies, both publically traded and private. He is currently a member of the newly constituted Sub Committee on Transfer Pricing for Developing Countries by United Nations and was also a part of the previous two Sub-Committees. He has been a member of several committees set up by Government of India, Ministry of Finance, Central Board of Direct Taxes (India), OECD and other associations. He is a visiting professor at Vienna University, Austria for teaching international tax for LLM studies.

## What our past participants say

### Ms Jillian Lim

*Executive Director, 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

*Banking Supervisor, Reserve Bank 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 Big 4 accounting firms (Deloitte & Touche; Ernst & Young; KPMG; 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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