

# Advanced Transfer Pricing & Global Transformation

4-6 March 2024, Amsterdam, The Netherlands

## Instructors

### **Anuschka Bakker**

*Deputy Director, IBFD Knowledge Centre, The Netherlands*



Anuschka Bakker is Deputy Director of the Knowledge Centre at IBFD in Amsterdam, and she is the manager of the VAT, Transfer Pricing and Specialist Knowledge Groups of IBFD. She has many years of experience in international taxation issues, of which the last 15 have been dedicated to transfer pricing and tax risk management. In addition, Ms Bakker is the Cluster Manager for the transfer pricing courses offered by IBFD International Tax Training. She is responsible for developing various trainings on transfer pricing, covering areas such as risk management, business restructuring, dispute resolution, and transfer pricing and customs valuation. Prior to joining IBFD, she worked for Ernst & Young and

PricewaterhouseCoopers. Ms Bakker also lectures and publishes regularly on a wide variety of transfer pricing-related topics. She has published over 30 articles and chapters on transfer pricing and tax risk management. Further, Ms Bakker is a regular speaker at transfer pricing conferences around the world. She holds a Master's degree in Tax Law from the University of Groningen, the Netherlands, and an MBA from Nyenrode Business University, the Netherlands.

### **Monica Erasmus-Koen**

*Partner Transfer Pricing, Taxtimbre, The Netherlands*



The combination of more than 18 years of tax and transfer pricing experience (PwC, EY, Taxtimbre) and working in large multi-competency teams on transformation projects has given Monica the opportunity to gain in-depth delivery experience in tax and transfer pricing structuring and implementation. She understands and appreciates the real practical issues business, finance and IT are struggling with to comply with transfer pricing regulations. She is a chartered accountant (SA CA) and holds a masters degree in Fiscal Economy from the Erasmus University in Rotterdam, the Netherlands. She lectures regularly for IBFD trainings.

## **Jeroen Kuppens**

*Director, KPMG, The Netherlands*



Jeroen Kuppens joined KPMG Meijburg & Co in 2011 after having worked at one of the other Big Four tax advisory firms. He has extensive experience in helping clients with business restructurings and transfer pricing, in particular when functions and assets are transferred cross-border, there is risk shifting, or new investments are made. Jeroen helps clients to mitigate their tax-related risks and to comply with their national and international obligations. He develops tax strategies for setting up international operational structures as part of the structuring/restructuring process.

## **Rezan Ökten**

*Partner/Head of Transfer Pricing, Dentons, The Netherlands*



Rezan Ökten is a partner and head of Transfer Pricing at Dentons' Amsterdam office. He advises clients on business restructurings, intellectual property, headquarters cost allocation models, financial transactions and valuations, as well as assisting in dispute management and resolution. His deep and significant experience includes advance pricing agreements, tax audits, mutual agreement procedures and court proceedings.

Starting his career at a Big Four firm, Rezan went on to head the transfer pricing practice of an Amsterdam law firm. His experience also includes working as a global in-house transfer pricing specialist of leading telecommunications and technology companies. His exceptional blend of knowledge and experience, gained on both sides of the table, allows Rezan to provide a 360-degree perspective. This is at the heart of how he advises clients. With a clear vision and technically sound approach, he knows when to go the extra mile or be pragmatic to get the buy-in from stakeholders. In addition to being a fellow at the University of Amsterdam's Advanced LL.M. program in International Tax Law, Rezan teaches master classes on transfer pricing at IBFD. A regular speaker at conferences, he has written several articles on transfer pricing aspects of intangibles and cost contribution arrangements. He has also authored a book and co-authored various transfer pricing books.

## **Hans Geluk**

*Global Transfer Pricing Manager, Danone, The Netherlands*



Hans Geluk is global transfer pricing manager at Danone. He has extensive experience in transfer pricing and has gained a broad knowledge on transfer pricing, advising the corporate, finance operations and other teams within Danone on a variety of transfer pricing matters.

Prior to joining Danone, Mr Geluk worked for PwC and KPMG. Over the past 15 years, he has gained experience in transfer pricing policy design, business restructurings, tax audits and transfer pricing documentation, as well as transfer pricing due diligence projects.

Mr Geluk studied International Business Administration at Erasmus University Rotterdam, the Netherlands.

## **Mark Drenth**

*Director Treasury Operations, Liberty Global, The Netherlands*



Mark Drenth is Director Treasury Operations at Liberty Global in the Netherlands. He has worked in the Corporate Treasury department since 2009, in which capacity he has gained a wide experience of all aspects of treasury. His responsibilities include both front-office dealing and all derivatives-related reporting, treasury systems and intercompany loan pricing.

Prior to his current role, Mr Drenth focused on the treasury middle office function, developing an advanced derivative valuation process. He has also been the treasury business lead for the implementation of an in-house bank and payment factory for Liberty Global.

Mr Drenth studied Economics at Erasmus University, Rotterdam, where he obtained his MSc degree in 2007. During his professional career, he obtained a Certificate in Treasury by the Association of Corporate Treasurers (ACT).

## **Eduard Sporken**

*Director, KPMG Meijburg & Co, The Netherlands*



Eduard is a Director at KPMG Meijburg & Co and a member of the Dutch and KPMG Global Transfer Pricing Services practices. He has assisted a variety of multinational clients in designing and implementing their global, European, and Dutch VCM/transfer pricing initiatives, and has successfully defended a wide range of transfer pricing cases in tax audits and obtained Dutch tax rulings and unilateral Advance Pricing Agreements (APAs).

Drawing on his 35 years of VCM/transfer pricing experience, Eduard places a particular focus on the application of the EU Arbitration Convention and Mutual Agreement Procedures to help clients headquartered in the US, Europe and Asia achieve successful dispute outcomes. He has vast bilateral and multilateral APA experience.

Early in his career, Eduard worked with a number of multinational companies, including US-based ones, where he was responsible for developing solutions to complex VCM/transfer pricing issues. Eduard has led a series of major international VCM/transfer pricing projects, including both multinational and bilateral APAs.

Eduard is a frequent contributor to tax journals and publications including BNA's Transfer Pricing Journal, the Tax Management Transfer Pricing Report and the International Tax Review. By virtue of his work, he has been named as one of the leading Dutch transfer pricing specialists in the Guide to the World's Leading Transfer Pricing Advisors every year since 1999.

Eduard holds a degree in Tax Law and International Tax from Leiden University and is a member of both the Dutch Association of Tax Advisors and the International Fiscal Association.