

Philippe Paumier

International Expert on Strategic and Operational Transfer Pricing

PROFESSIONAL SUMMARY

I am a TP professional with 19 years experience in operational, tactical and strategic transfer pricing. I have led for 9 years a multidisciplinary international team of 12 that provides TP end to end advice and support to a major MNE with a complex Value Chain and valuable intangibles, in a TP exposed industry where direct negotiations with top Tax officials are frequent.

PROFESSIONAL SUMMARY

- Successfully lead and consolidated an internal TP practice within Sanofi covering +40 € Bn ICO transactions
- Delivered technical solutions and negotiated 2 multi € Bn APAs between France and the US, leading to significant CIT savings and penalty cancellation in the US
- Have led and negotiated Cas in multiple jurisdictions
- Provided a tax efficient solution reconciling US Regs on CSAs, BEPS aspects and PPA in a reverse IP migration project (US, CH, NETH)
- Designed and led the TP restructuring and alignment projects subsequently to several multi €Bn acquisitions
- A trusted interlocutor for the top management of the company and tax officials in several jurisdictions

A RECONIGZED EXPERT

I have been a regular speaker in international conferences

- TP Minds (London)
- Global TP Forum (Europe)
- BNA TP Conference (Paris)
- Global TP Forum (USA)
- CBI Pharma TP (USA)
- OECD Consultation on CSAs (Paris)
- OECD Brazil TP consultation (Brasilia)

CONTACT DETAILS– VECTOR TP

Telephone: (33) 1 86 86 02 90

philippe.paumier@vectortp.com

PROFESSIONAL BACKGROUND

FOUNDER OF VECTOR TP – since July 2019

- Providing companies with intercompany solutions on the different aspects of transfer pricing (value chain, integrations, PPAs, Intangibles, internal processes and economic aspects of controversy).
- Co-sourcing solutions for Finance and Tax departments on intercompany related topics (diagnostic, transformation, projects).

GLOBAL HEAD OF TRANSFER PRICING Sanofi – 10/05 to 06/19

Leadership of the internal TP practice of Sanofi

- **Strategic TP:** policy definition and intangible valuation, Bilateral APAs (USA, France, Germany, Japan, Singapore, Netherlands), and policy aspects within the business and with tax officials. Value chain analysis and economic analysis. Management fees policy design and update.
- **Tactical TP:** controversy management in a large panel of countries (audits and competent authorities). Risk assessment and deployment of Action 13 components (CbCR, Master File and Local File).
- **Operational TP:** definition of operational models and monitoring of TP processes, including non-TP parameters (systems, Customs, VAT) and business opportunities and constraints. Designed 30 pax+ intercompany management unit.

GLOBAL TRANSFER PRICING MANAGER GE Healthcare – 05/03 to 07/05

- Deployment of a principal model for EMEA (design of the model, policy, monitoring, US Tax consequences).
- Launched TP documentation strategy and processes.
- Major tax controversies in France and Germany.

TRANSFER PRICING MANAGER Sanofi Synthélabo – 04/00 to 04/03

- Industry analysis and value chain – ethical products and generics
- Controversy in Europe and Latin America
- Support to Principal Co. implementation
- Policy modelling for new products and documentation

JUNIOR ECONOMIST Ministry of Cooperation – 10/97 to 10/99

- Based in Yaoundé (Cameroon)
- Macro Economic monitoring and Public Accounts controlling
- Private sector environment and microproject management

ACADEMIC BACKGROUND

CERDI – 1996/1997 MSC in Development Economics and Project Appraisal in this research center of Université d'Auvergne, affiliated to the CNRS (French public research system)

ESCP EUROPE – 1993/1996 Master in General Management and Corporate Strategy including 8 months at TEC de Monterrey (Mexico).

COMMUNICATION SKILLS

- French and Spanish (mother tongues), high proficiency in English.
- Excellent oral and written presentation skills and stakeholder management
- Expertise in data modelling and restitution