

CV

Nilanjan Nag

Head of Transfer Pricing and Tax Strategy
MBA

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Knowledge & Skills

Function	<ul style="list-style-type: none"> • Transfer Pricing Compliance & Global Documentation – Ensuring regulatory adherence through comprehensive management of Master File, Local File, and Country-by-Country Reporting (CbCR), ensuring consistency with OECD BEPS requirements. • Strategic Transfer Pricing Planning – Designing robust, defensible transfer pricing policies aligned with business models and commercial objectives. • Litigation & Controversy Support – Providing expert representation and strategic support in complex transfer pricing disputes with tax authorities. • DAC6 Advisory – Advising on cross-border reporting obligations, risk assessment under DAC6
Educational Qualifications	<ul style="list-style-type: none"> • Corporate Finance Certification • Indian Institute of Management Calcutta (IIM Calcutta) • Master of Business Management (Finance) • National Institute of Technology (NIT), Durgapur • West Bengal, India • Bachelor of Accounting • University of Calcutta • Kolkata, West Bengal, India
Work experience	<ul style="list-style-type: none"> • Leveraging experience across India, Malaysia, Romania, and Lithuania, with a proven ability to navigate diverse cultural and professional environments, engage stakeholders effectively, and drive results. • Over 18 years of professional experience in transfer pricing and international taxation. • More than a decade of Big Four experience across Deloitte and PwC (India and Malaysia). • Headed PKF Global's Transfer Pricing practice in Romania (Top 15 global firm) for six years. • Led the Center of Excellence for PKF Global in Romania serving Northern Europe, providing strategic transfer pricing guidance and support to regional offices.

	<ul style="list-style-type: none">· Nearly two years of experience in Lithuania with independent transfer pricing firms, focusing on advisory work.
Major projects	<ul style="list-style-type: none">· Advised leading multinational corporations across retail, consumer goods, and beverages on global transfer pricing strategy, shaping value allocation frameworks and profit models including DEMPE analyses and profit splits to mitigate risk, and support business objectives.· Advised leading global brands in the beverages, chocolate, and packaging sectors on complex transfer pricing audits; spearheaded audit strategy, managed stakeholder negotiations, and drove settlements, ensuring defensible outcomes.· Contributed as part of the APA team for a leading Japanese card manufacturer, supporting the development and negotiation of a long-term transfer pricing framework and methodology to secure regulatory certainty and compliance.
Key industries served	<ul style="list-style-type: none">· Manufacturing, consumer goods, IT services, software, food & beverages, retail, packaging products.· Financial services – banks and insurance
Languages	<ul style="list-style-type: none">· English (Bilingual);· Romanian (Intermediate)
Publications and Other Contributions	<ul style="list-style-type: none">· Articles on Transfer Pricing – Authored industry-focused articles on transfer pricing topics.· Speaker & Trainer – Delivered sessions and workshops on transfer pricing for professional audiences.· Professional Development – Attended advanced transfer pricing programs, including at Vienna University.