



EUGENIO TARABINI

E-mail: eugenio.tarabini@gmail.com

Mobile: +39 3394478688

Address: Sondrio, via Diego Gianoli 7, Sondrio

Date of birthday: 09/11/1989

Nationality: Italian

Professional Experiences

Feb 2020 - Present

HLB (SP&P), Milan (Italy)
International Tax – Transfer pricing
www.hlb.global

Main activities:

- Support in scrutinizing the coherence of the MNE's business model with the intra-group pricing system to identify and mitigate the potential risks associated with the TP policies.
- Support in the economic, financial and legal aspects related to extraordinary operations (e.g. initial contributions, mergers, acquisitions, buy-backs and spin-offs).
- Performance business and assets valuation (e.g. company and group valuations, tangible and intangible assets valuations, impairment tests, fairness opinions regarding the sale or merger exchange ratio).
- Preparation of Italian Patent Box application in case of ruling or Patent Box documentation in case of self-declaration option.
- Assistance in the negotiation of Advance Pricing Agreements (APA) and Mutual Agreement Procedure (MAP) with tax authorities;
- Advice and assistance in corporate restructuring operations for an efficient value chain management process.
- Training, coaching and managing senior and junior resources

Jan 2018 – Jan 2020

PwC, Luxembourg
Manager | International Tax – Transfer pricing
www.pwc.com

Main activities:

- Performance of financial and economic analysis for transfer pricing purposes, mainly with respect to financing intra-group transactions;
- Performance of value chain analyses of complex multinational organization for different purposes (e.g. business restructuring, value chain transformation);
- Performance of credit risk analysis for financial transfer pricing purposes, by using different risk assessment databases and models;
- Planning and set-up of transfer pricing policies for financing structures;
- Preparation of Global transfer pricing Documentation, covering transfer pricing compliance for several jurisdictions;
- Assistance and preparation of economic analysis and reports for pricing different types of financing transactions (e.g. convertible bonds, intercompany loans, profit participating loans);
- BEPS analysis and CbCr assessment;
- Training, coaching and managing senior and junior resources.

Mar 2014 – Dic 2017

Deloitte, Milan (Italy)
Senior Analyst | International Tax – Transfer pricing
www.deloitte.com

Main activities:

- Communicating with clients to understand their business and transfer pricing requirements;
- Performance of financial and economic analyses for transfer pricing purposes;
- Drafting transfer pricing reports for planning, documentation and defense purposes;
- Assistance in the negotiation and drafting of Advance Pricing Agreements (APA) with tax authorities;
- Application of valuation techniques for tangible and intangible assets, shares, and companies
- Estimating potential tax benefits arising from the Patent Box regime and draft Patent Box studies;
- Assisting with client marketing efforts and preparing proposals;
- Disputing resolution (tax audit defence and assistance);
- Training junior resources.

Sept 2011 – Dec 2011

Forma Mentis di Elisabetta Mevio, Sondrio (Italy)
Assistant

Main activities: tutoring accountancy and law for students of secondary schools; support in the study and in the carrying out the homework;



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Education

- Mar 2016* **Chartered Accountant** certified by the Italian Association of Chartered Accountants
- Oct 2019* **PwC - Global Transfer Pricing - TP Level 3**
- Oct 2015 – Oct 2015* **Deloitte – Master in Taxation, Milan (Italy)**
- Sept 2014 – Sept 2014* **Deloitte – EMEA Transfer Pricing Boot Camp, Prague (Czech Republic)**
- Sept 2011 – Feb 2014* **Catholic University, Milan (Italy)**
Master in Economics and Business Law
Main courses: Corporate Finance (issues of financial management); Risk Management; Models for Financial Markets (Derivatives); International Accounting.
Dissertation: “Warrant and Covered Warrant”. Rapporteur: prof. Regoli Duccio.
- Sept 2008 – Nov 2011* **Catholic University, Milan (Italy)**
Bachelor in Business Economics and Management
Dissertation: “Structural Logics of Intra-organizational Network”. Rapporteur: prof. Bodega Domenico
- July 2009 – Aug 2009* **Lions Club International – Exchange Programme, Ipoh (Malaysia)**

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| <i>Italian</i> | Native language |
| <i>English</i> | Advanced |
| <i>Spanish</i> | Basic |

Computer skills

- *Proficiency of Microsoft Office tools.*
- *Daily User of Bureau Van Dijk’s databases TP Catalyst, ORBIS, AMADEUS and AIDA; as well as royalty rates & company financial databases such as Bloomberg and Royalty Stat.*

Additional information:

- *Interests include tennis, soccer, skiing, hiking, swimming and travelling.*