# TRANSFER PRICING ADVISORY



## Transfer Pricing Advisory

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Massimo Fontana

### **Professional Background**

Senior Advisor specialised in Transfer Pricing modelling, Countryfile and Masterfile, Tax Audits, Patent Box Analysis, brand-enhancement assessments, etc..

Massimo has more than 15 years' experience in Transfer Pricing services and projects, and has supported clients in the entire transfer pricing value chain: preliminary check-up, functional analysis, economic analysis, risk assessment and Transfer Pricing audits. He also assists clients in international business trips (China, India, Turkey, Romania, Spain, etc.) aimed to extend group TP policy.

Massimo is member of IFA (International Fiscal Association).

For many years he has been Group CFO of a multinational group operating in the display industry, a group comprising 12 international companies, 900 employees, and 7 production sites. In his role he has coordinated, reporting directly to the Group CEO and the BoD, group companies located in the US, Taiwan, China, United Kingdom and Romania, leading the group's global Finance team. Has managed various international finance projects to support the Group's expansion; worked on the acquisition and the start-up of an important Italian company, driving the due-diligence phase and the integration process.

He had previously been Financial Controller of an important business division of Marzotto-Valentino Fashion Group (textile and fashion industry), working in the Corporate Finance area.

He holds a degree in Economics, and during university studies he cooperated with a consulting firm specialised in project-funding for Innovation and R&D programs.

#### **Proven Track Record**

Dealt with numerous tax effective supply chain management projects involving global Multinational Enterprises, obtaining significant tax optimization / simplification of processes.

He completed numerous valuation projects for large companies, banks and groups who have also applied for Patent Box benefits.

# Capabilities

Solid and extensive experience in Transfer Pricing, assisting European-based and global clients in designing, implementing, and documenting transfer pricing systems (i.e. regional management head offices charges, manufacturing, distribution, R&D, procurement, finance, guarantees, cash pooling, licensing structures).

Massimo has worked in a wide variety of industries, including fashion-luxury, machinery & equipment, cosmetics & biotech, energy, oil & gas, gaming & betting, entertainment, hand-tool, ATM, banking & finance, asset management, real estate, and software.

Other skills include economic, financial and managerial accounts analysis, dealing with multination groups, smaller organizations and family run businesses.