

38th Annual

# Asia Pacific Tax Conference

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### Baker McKenzie Speakers



**Adeline Wong**

Chair, Asia Pacific Tax Practice Group, Malaysia (Wong & Partners)

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Adeline Wong heads the Tax, Trade and Wealth Management Practice Group of Wong & Partners and chairs the Asia Pacific Tax Practice Group of Baker McKenzie. She has over 30 years of experience in the area of corporate tax planning, advisory, audit and investigation work.

Adeline was recently awarded Indirect Tax Practice Leader of the Year at the International Tax Review Asia Pacific Awards 2022 and inducted in the Hall of Fame for Tax by Legal 500 Asia Pacific. Her practice was named the Tax and Trusts Law Firm of the Year by the Asian Legal Business Malaysia Law Awards in both 2020 and 2021. She is ranked as a Band 1 practitioner by Chambers Asia Pacific for Tax and by the Chambers High Net Worth Guide for Private Wealth Law. Clients commend her as "a leading tax lawyer" and a "standout name in the private wealth market in Malaysia" in the Chambers guides. The International Tax Review also ranks Adeline as a Highly Regarded practitioner in the areas of Tax Controversy and Indirect Tax.



**Allen Tan**

Principal, Singapore

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Allen Tan is the head of the Tax, Trade and Wealth Management practice in Baker McKenzie Wong & Leow. He has extensive experience working on both international and local tax issues, with a special focus on the regional tax aspects of the transactions that he is involved in. Allen's clients include Global Fortune 500 multinational corporations and major Singapore conglomerates. He is recognised as a leading lawyer for his tax controversy and corporate tax work in many leading legal and tax directories including International Tax Review, Chambers Asia Pacific and Legal 500 Asia Pacific. Allen was also named the Asia Tax Practice Leader of the Year 2018 by International Tax Review.

Allen focuses on tax issues arising from corporate and supply chain reorganisations, foreign direct investments, cross-border planning/restructuring, transfer pricing, mergers and acquisitions, private equity fund structuring, tax controversies (both domestic and cross-border), as well as indirect and transfer taxes. In recent years, Allen has also been actively engaged in tax policy work, both in Singapore and internationally.



**Dawn Quek**

Principal, Singapore

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Dawn Quek is a leading tax and private client lawyer in Singapore with more than two decades of experience in corporate tax and international tax planning. She is the Head of the Wealth Management practice in Singapore and is the Asia Pacific representative on the Firm's Global Wealth Management Steering Committee. She works with ultra high net worth families and their family offices on international tax planning, estate and succession planning, family governance, and philanthropy.

Dawn is consistently ranked as a leading tax and private client/wealth lawyer by various legal publications including Chambers High Net Worth (HNW) Guide, International Tax Review Women in Tax Leaders Guide and the Legal 500 Asia Pacific. She was named "Tax Attorney of the Year" at the International Tax Review Awards 2024, "Private Client Lawyer of the Year" at the 2018 Asia Legal Awards by The Asian Lawyer, and "Women in Wealth Management" at the 2018 and 2020 WealthBriefingAsia Awards.



**Kate Alexander**

Partner, United Kingdom

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Kate Alexander is a partner in Baker McKenzie's Corporate Tax Department in London and is Chair of our Global Technology, Media & Telecoms Industry Group. Kate is a solicitor, chartered accountant and chartered tax adviser with over 25 years' experience advising clients on their tax matters.

Prior to joining the Firm, she spent seven years as a partner at a Big Four accounting firm.

Kate has particular expertise in advising technology companies in relation to all aspects of their cross-border tax structuring. She regularly assists multinational companies with the design of their global holding, financing, intellectual property and supply chain structures. She has worked closely with many clients on strategic projects in this space helping them navigate the complexity of applying different tax regimes across the world.

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**Irvan Ardiansyah**

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Irvan Ardiansyah is an Associate Partner in the Tax & Customs Practice Group of HHP Law Firm, the member firm of Baker & McKenzie in Indonesia. He is a customs specialist. Before he joined HHP, he worked in the Directorate General of Customs and Excise ("Customs") as a Customs Auditor for 12 years, and he worked for the tax division of a big four public accounting firm for 11 years. He is adept in providing various types of customs advice, customs audit assistance, and customs dispute assistance in various industries, including in areas such as information and communication technology, electronics and mobile phones, energy & mining, automotive, plantation (palm and its derivatives, cocoa) and other consumer products.

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**Rafic Barrage**

Partner, United States

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Rafic H. Barrage is a Principal in Baker & McKenzie's North America Tax Practice Group. He has almost 20 years of broad international tax planning experience. Mr. Barrage advises clients on a variety of issues, including restructuring and entity rationalization, IP migration, supply-chain planning and principal structures, the taxation of digital transactions, deferral and repatriation planning, foreign tax credit planning, and post-U.S. tax reform tax optimization. Mr. Barrage is a recognized leader in his field by The Legal 500 (2010 and 2011) (described as one of the "impressive younger partners" and "technically very strong") and as one of the Tax Controversy Leaders by the International Tax Review (2011 and 2012). Mr. Barrage is an Adjunct Professor of Law at Georgetown University Law Center, where he has taught the International Tax Business Planning workshop since 2013.

Mr. Barrage regularly advises US corporations operating overseas and foreign corporations and individuals operating and investing in the United States on a broad range of international tax issues. Among other industries, Mr. Barrage's practice focuses on the software and high-technology, pharmaceutical and life sciences, and the shipping (container and cruise line) industries.

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**Corey Bass**

Foreign Associate, Japan

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Corey Bass is a member of the Firm's Tax & Transfer Pricing Group in Tokyo.

Corey primarily focuses his practice on inbound Japanese tax and transfer pricing issues for multinational companies, including M&A and corporate restructuring-related matters, comprehensive tax advice for the Japanese operations of multinational companies headquartered overseas and advice on tax-related issues specific to Japan (e.g., corporate tax, consumption tax, etc.).

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**Yvonne Beh**

Partner, Malaysia (Wong & Partners)

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Yvonne Beh is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. She has been advising on Malaysian tax laws and legal issues relating to corporate and commercial matters in Malaysia.

Chambers Asia Pacific ranked her as a Band 3 practitioner for Tax, having previously listed her as Up and Coming in 2020. In the Chambers guide, clients commend her for having "a deep knowledge base" and as a lawyer who "knows commercial and tax matters." She is also named as a Leading Individual for Tax by Legal 500 Asia Pacific in its 2024 guide. Yvonne is further recognized as being Highly Regarded and a Women In Tax Leader by International Tax Review in the area of indirect tax. Yvonne won the Euromoney Asia Women in Business Law Award for the Tax category in 2015 and 2017. She was also recognised in the Asian Legal Business 40 under 40 list in 2016.

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**Javier Blázquez**

Partner, Spain

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Javier Blázquez is a partner of the Tax Practice Group at Baker McKenzie Barcelona. In 2018 and 2019 was on secondment in our San Francisco and Palo Alto offices. He became a partner in 2022.

Javier is a frequent speaker on international tax planning programs.

He focuses on advising domestic and international companies on tax issues, international tax planning, reorganizations, transactions and tax audits on international matters.

He represents clients in various industries, including platforms and e-commerce, software, blockchain, payments, life sciences, retail and hospitality.

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**Tom Brennan**

Economist, Australia

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Tom Brennan is an experienced economist with more than 13 years of transfer pricing and international tax experience in the United Kingdom and Australia. He focuses on transfer pricing and regularly works with Baker McKenzie's Australia Tax Team.

Tom has worked with a range of clients across a number of industries including technology and communications, finance, defence and aerospace, mining and oil, consumer products and real estate.

He has extensive experience in the design, implementation and defence of tax efficient business models, in a range of jurisdictions. He has worked with a number of multinationals to develop transfer pricing solutions, which are commercially aligned and practical to implement. Tom also advises on intra-group financing, including thin capitalisation, withholding taxes and consideration of relevant anti-avoidance legislation.

Tom regularly represents clients in their dealings with revenue authorities, including tax controversy defence and settlement, as well as the negotiation of APAs (both unilateral and bilateral) and other advance clearances.

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**Simone Bridges**

Partner, Australia

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Simone Bridges is the Head of Tax in the Australian office of Baker McKenzie. Her extensive technical knowledge and experience on complicated matters makes her one of Australia's most sought tax lawyers specialising in cross border and international tax issues especially in a controversy context. She is known as a tax technician with the right demeanour to help clients navigate disputes with Australian tax and revenue authorities. She is consistently ranked as 'Highly Regarded' and a 'Women in Tax Leader' by the International Tax Review and a 'Next Generation Partner' by Legal 500.

Simone has significant experience in representing clients in tax disputes and tax audits with Australian tax and revenue administrations, particularly involving anti-avoidance assertions.

Her technical expertise is also reflected in her role as a University teaching academic and guest lecturer. She is also a contributor to global and local tax publications including Thomson Reuters, CCH and Bloomberg Tax.

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**Pierre Chan**

Partner, Hong Kong

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Pierre Chan is a partner in Baker McKenzie's Hong Kong office and a member of the Firm's Tax Practice Group. Pierre's practice focuses on Hong Kong and regional tax advisory, tax dispute resolution and succession planning. He advises multinational companies, financial institutions, insurance companies as well as investment and pension funds with respect to their income tax and stamp duty issues, as well as tax issues related to mergers and acquisitions. He also advises wealthy families in relation to their succession planning as well as the legal and tax issues arising from their businesses.

Over the years, Pierre has advised and represented taxpayers in various major tax disputes in Hong Kong. He also advises charitable institutions on their establishment and governance.

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**Nopporn Charoenkitraj**

Partner, Thailand

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Nopporn Charoenkitraj joined Baker McKenzie in 2007 after practicing tax law with another law firm in Bangkok for seven years. He became a Partner in 2016 and is currently active in the Tax Practice Group.

With his combined 22 years of practice, Nopporn provides comprehensive legal advice on tax law and other aspects of civil and commercial law, advises on tax structure for M&A, digital and technology transactions, inbound and outbound investments, and wealth management, assists in implementing corporate and shareholding restructuring, and represents clients in a tax dispute and litigation.

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**Istee Cheah**

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Istee Cheah is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. Her key practice areas are wealth management and succession planning. Her Wealth Management practice was named the Tax and Trusts Law Firm of the Year by the Asian Legal Business Malaysia Law Awards in both 2020 and 2021, and is ranked as a Band 1 practice by the Chambers High Net Worth Guide for Private Wealth Law.

She has collaborated on several guides and publications including LexisNexis Practical Guidance - Tax, where she co-authored the Taxation in Malaysia: Overview, Taxation of Trustees and Trust Funds, Automatic Exchange of Information and Succession Laws in Malaysia articles.

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**Ken Chia**

Principal, Singapore

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Ken Chia is a member of the Firm's IP Tech, International Commercial & Trade and Competition Practice Groups.

He is regularly ranked as a leading TMT and competition lawyer by top legal directories, including Chambers Asia Pacific and Legal 500 Asia Pacific.

Ken is an IAPP Certified International Privacy Professional (FIP, CIPP(A), CIPT, CIPM) and a fellow of the Chartered Institute of Arbitrators and the Singapore Institute of Arbitrators.

Ken has more than 30 years of experience practicing in the areas of IT, telecommunications, intellectual property, trade and commerce, and competition law matters. He routinely assists clients, mostly governments and multinational corporations, in large-scale procurement, outsourcing and regional transactions, and provides sound advice on privacy and e-commerce matters.

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**Clinston Chiok**

Associate, Singapore

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Clinston Chiok has advised on both Singapore and regional tax issues, including issues arising from mergers, corporate restructuring and cross-border tax planning. He also has experience advising on stamp duty and GST.

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**Peggy Chiu**

Partner, Taiwan

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Peggy Chiu is a partner at Baker McKenzie's Taipei office and serves as the co-leader within the tax practice group. She has extensive experience in banking and finance, regulatory compliance, and private banking matters. Additionally, Peggy is knowledgeable in the financial technology and innovation sectors and has handled traditional financing, family succession planning, anti-money laundering compliance, insurance, and tax issues.

Prior to joining Baker McKenzie, Peggy was a Certified Public Accountant and has continued to hold this certification after joining the Firm. With over four years of in-house experience, she provides practical counsel on banking and corporate operations. Her dual background in accounting and law enables her to address both the financial and legal aspects of client needs.

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**Erik Christenson**

Partner, United States

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Erik Christenson practices in the area of general international tax planning for businesses.

Erik is a member of the steering committee for the Northern California chapter of the International Fiscal Association (IFA), and he is on the Permanent Scientific Committee for IFA USA. Erik is the liaison to Baker & McKenzie's Global Tax Practice Group for the Technology Media and Telecom.

For nearly twenty-five years, Erik has advised advising multinational corporations — both US and foreign-based — on all aspects of the taxation of international structures and cross-border transactions and operations. He represents clients in various industries, including online services and e-commerce, software, manufacturing, retail, payments and fintech, and life sciences.

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**Thanh Hoa Dao**

Special Counsel, Vietnam

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Thanh Hoa Dao is a special counsel in Baker McKenzie's Ho Chi Minh office. Prior to joining Baker and McKenzie, she worked as legal counsel at one of the Big Four firms.

Hoa's practice focuses on tax advice and planning related to corporate and individual tax issues, customs, as well as other general corporate commercial matters.

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**Sirirasi Gobpradit**

Partner, Thailand

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Sirirasi Gobpradit joined Baker McKenzie in 2013 and is a partner in the Tax Practice Group of Bangkok office. Sirirasi is a visiting lecturer for taxation classes at the Faculty of Law and the Faculty of Commerce and Accountancy of a leading university in Thailand. Sirirasi was ranked as a Rising Star in Tax by The Legal 500 Asia Pacific in 2023 and 2024 and was awarded as Indirect Tax Rising Star by International Tax Review (ITR) Asia Pacific Tax Awards 2024.

Sirirasi has considerable experience in providing tax advice for M&A and corporate restructuring, conducting health check from a tax perspective, providing tax advice for employment benefits (including equity-based compensation programs), providing tax advice for cross-border transactions, and advising on general tax planning.

Sirirasi regularly assists and represents clients at all stages of tax disputes, including tax audit process, appeal process, and court proceedings.

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**Tingting Guo**

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Tingting Guo's practice involves a wide range of tax services for international and domestic companies in various industries, with a focus on PRC tax planning and advocacy in relation to M&A, corporate restructurings, tax and transfer pricing disputes, and inbound and outbound investments.

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**Daru Hananto**

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Daru Hananto is a Partner - Tax Litigator in the Tax & Customs Practice Group of HHP Law Firm, a member of Baker McKenzie in Indonesia.

Daru has extensive experience in Indonesian taxation. He has significant experience in tax litigation and controversy, and also in advising clients on taxation issues related to digital economy, consumer goods, construction and Production Sharing Contracts (PSC).

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**Jaclyn Ho**

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Jaclyn Ho has over 10 years of experience and specialises in solving the tax needs of multinational corporations and Singapore-headquartered companies across various industries globally and regionally.

She is adept at complex tax transformations to help clients unlock and maximise long term value, and achieve sustainable and tangible benefits, in tandem with business current and target operating models.

Jaclyn has extensive and deep experience in unlocking corporate synergies across the spectrum of tax-related services that Baker & McKenzie offers. Whether it is an international tax issue, restructuring strategies and implementation, intellectual property planning, M&A, or tax incentive negotiations with the relevant authorities, Jaclyn is a trusted advisor to her clients with her practical, sophisticated, innovative, and tailored solutions.

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**Miles Hurst**

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Miles Hurst is a leading direct tax expert and a partner in Baker McKenzie's Tax Team in Sydney. He has 18 years' experience in tax.

Miles is recognised as Highly Regarded for General Corporate Tax by International Tax Review World Tax and is ranked as a Next Generation Partner by Asia Pacific Legal 500.

He is an author of Thomson Reuters' Laws of Australia commentaries on International Tax and Planning & Anti-avoidance Measures and has been published in The Australian, Bloomberg, The Australian Federal Tax Reporter, CCH Tax Week, the Daily Tax Report, Global Compliance News and LexisNexis Lexology.

He is also a regular moderator and speaker at tax conferences, including the Tax Executive Institute's Tax Summits, the Asia Pacific Tax Conference and AVCJ's Private Equity and Venture Capital Forum.

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**Camila Jacinto-Lagustan**

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Maria Ana Camila Jacinto-Lagustan is a partner in Quisumbing Torres' Tax Practice Group and the head of the Automotive sector of the Industrials, Manufacturing & Transportation Industry Group of the Firm. She is also a member of the Healthcare & Life Sciences Industry Group. She has 14 years of experience advising clients on general tax planning, international tax, VAT and indirect taxes, tax controversy and litigation, customs and trade issues and procedures, and tax advisory and advocacy work.

Camila provides tax and corporate advice on internal revenue taxation, value-added tax, documentary stamp and capital gains tax, transfer pricing, and tax planning for corporate structuring and spin-offs. She handles tax assessments before the Bureau of Internal Revenue, various local government units, and courts of law. She also assists in obtaining confirmatory tax rulings and applications for tax treaty relief under various international double taxation treaties.

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**Brendan Kelly**

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Brendan T. Kelly is a registered foreign lawyer of Baker McKenzie's Hong Kong office and head of the China Tax Practice. Brendan has practiced tax with an Asian focus for about 25 years, with two decades based in China. He has performed a wide range of analysis for various industries with regard to China tax implications, and specializes in advising cross-border clients on tax and legal implications of investment in China.

Brendan also has in recent years expanded into regional and global work with multinationals on major mergers and acquisitions, to develop integrated and tax-efficient supply chain structures and defend against tax audits and assessments in China and across the Asia Pacific region. While China remains very much at the core of his practice, Brendan works on a variety of multi-jurisdictional deals and matters on behalf of his clients.

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**Jeong Mo Koo**

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Jeong-mo Koo is a Senior Associate at Tax Practice of Baker McKenzie & KL Partners Joint Venture Law Firm. Jeong-mo advises inbound and outbound clients on international tax and investment matters.

Jeong-mo has extensive experience in providing advice on tax issues that multinational enterprises face in their cross-border transactions and their Korean operations. He has developed expertise in structuring inbound and outbound investments by both foreign and Korean enterprises. He has also provided cross-border tax and estate planning services for high-net-worth individuals.

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**Ethan Kroll**

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Ethan Kroll is a partner in the Los Angeles office and the Chair of the Firm's West Coast Tax Practice. He contributes regularly to Bloomberg's Tax Management International Journal and speaks frequently on international tax issues. Previously, he was a principal at a Big Four accounting firm.

Ethan provides comprehensive, business-focused solutions to tax, legal, and other issues facing multinational enterprises in a wide range of sectors, including life sciences, consumer products, software, digital, and high technology companies. He advises on all aspects of US international income taxation, with an emphasis on multijurisdictional restructurings, expansions, and collaborations; supply chain management and enhancement; intellectual property alignment; loss optimization; and inbound and outbound investment.

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**John Kwak**

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John Kwak is a partner leading the tax practice of Baker McKenzie & KL Partners Joint Venture Law Firm. John's practice focuses on the tax aspects of a wide range of cross-border corporate transactions and investments.

John is a seasoned lawyer with over 20 years of experience in international taxation and cross-border transactions. He has successfully represented multinational corporations in tax audits, tax litigation, dispute resolution, transfer pricing, M&A tax structuring, and overseas investment strategies.

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**Shih Hui Lee**

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Shih Hui Lee has advised on both regional and Singapore tax issues, with focus on advising MNCs on international tax aspects of cross-border transactions. Her practice includes advising clients on tax issues arising from mergers and acquisitions, indirect taxes, transfer taxes, foreign direct investment and cross-border tax planning issues.

Prior to joining Baker McKenzie, Shih Hui worked in one of the Big Four accounting firms in Singapore. She has experienced being an in-house regional tax advisor in one of the multinational cable and satellite television channel.

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**Calista Li**

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Calista Li is a senior associate in Baker McKenzie's Hong Kong office and a member of the Firm's Tax & Trade Practice Group. Her practice focuses on Hong Kong tax advisory and tax dispute resolution.

She regularly advises multinational companies, financial institutions and individuals with respect to their income tax and stamp duty issues, as well as tax issues relating to corporate restructurings and employee benefits

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**Jason Liang**

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Jason Liang is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. His focus is on tax disputes and controversies, with experience in handling all aspects of tax litigation. He regularly appears before the national courts and tax tribunals, representing clients on landmark tax disputes and precedent-setting cases.

Chambers Asia Pacific ranked him as a Band 4 practitioner for Tax in 2024, having previously listed him as Up & Coming for Tax from 2021. In the Chambers guide, clients commend him for having "good knowledge and insights on tax-related disputes in Malaysia" and that he is "very persistent in achieving results and is helpful for clients wanting to understand the pros and cons of the legal actions involved." He is also named as a Leading Individual for Tax by Legal 500 Asia Pacific with clients commending him on his "excellent technical knowledge" and ability to "successfully deliver on promises."



**Amy Ling**

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Amy Ling advises multinational companies on a range of issues relating to PRC tax and legal implications of investments in China, including mergers and acquisitions, divestitures, reorganizations, post acquisition integration, licensing, retail structures, supply chain structures and individual income taxation matters.

Amy's previous work experience include a number of years practicing in New York City with a Big Four Accounting Firm and a major Investment Banking Firm.

She has over 12 years' experience in advising China tax issues.



**Stewart Lipeles**

Partner, United States

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Stewart Lipeles practices in the area of corporate tax law, with an emphasis on international tax planning. He joined the firm in 1996 and became a partner in 1999. From 1993 to 1996, Mr. Lipeles was an associate at the law firm of Jenner & Block. From 1994 to 1996, he was also an Adjunct Professor at IIT/Chicago Kent College of Law, where he taught classes on International Taxation and other subjects. Mr. Lipeles served as a law clerk to the Honorable E. Grady Jolly of the U.S. Court of Appeals, Fifth Circuit in 1992 and 1993.

Mr. Lipeles advises US-based multinational corporations in connection with international tax planning and global tax projects. He also represents taxpayers in tax aspects of mergers and acquisitions. For instance, Mr. Lipeles represented a coalition of taxpayers before the Internal Revenue Service requesting and ultimately obtaining changes to the proposed Bausch & Lomb regulations. Mr. Lipeles works with a wide variety of industries, ranging from high tech and biotechnology firms in the Silicon Valley to traditional manufacturing and entertainment companies.



**Carrie Lui**

Special Counsel, Hong Kong

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Carrie Lui is a special counsel in Baker McKenzie Hong Kong office. She is experienced across a broad range of sectors and industries. Carrie's tax knowledge is complimented by her experience working as a tax lawyer in New Zealand prior to joining Baker McKenzie.

Carrie is also a regular speaker and panelists in major client conferences of the Firm.

Carrie's practice covers a wide range of tax matters with particular focus on corporate restructuring, merger and acquisitions, private equity and investment funds and tax disputes.



**Mubareke Mahemuti**

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Mubareke Mahemuti's practice involves a wide range of tax services for international and domestic companies, with a focus on PRC tax planning and tax advice for M&A and corporate restructuring. She has also been involved in indirect and direct transactions cases in the PRC.



**Ludmilla Maurer**

Counsel, Germany

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Ludmilla Maurer, a counsel, joined Baker McKenzie's Frankfurt office in 2010. She is a member of the German Tax Practice Group, a member of the EMEA Steering Committee for Employee Benefits and a member of the Global Immigration & Mobility Steering Committee. Ludmilla studied law at the University of Bayreuth, Germany, concentrating on tax law. She also has an additional qualification in business studies as Wirtschaftsjuristin from the University of Bayreuth. She passed the first State Exam in Bayreuth in 2006 and was admitted to the German bar in 2009. After passing the first State Exam, Ms. Maurer worked at an international law firm in Moscow as a law clerk. During her legal clerkship (Referendariat) and prior to joining Baker McKenzie, she worked for several large international law firms in their corporate departments. In 2013, Ludmilla was admitted as a certified tax advisor and a certified tax lawyer. In 2015, she completed a Master of International Taxation, MIntTax, degree at the University of Sydney.

Ludmilla advises German and foreign clients with respect to national and international tax, corporate law and tax controversy issues. Her practice focuses on tax advice in connection with M&A transactions and corporate restructurings as well as with the implementation of employee benefits programs. She also advises high net worth individuals, families and global financial institutions on cross-border tax and trust structuring, asset protection and multijurisdictional investment structures.

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**Kristine Mercado-Tamayo**

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Kristine Anne Mercado-Tamayo is a partner and the head of Quisumbing Torres' Tax Practice Group. She heads the Industrials, Manufacturing & Transportations Industry Group and is also a member of the Consumer Goods & Retail. She has 16 years of experience assisting and advising clients on tax issues relating to corporate restructuring and mergers and acquisitions. Kristine also handles customs and international trade matters, including border and post-clearance disputes. She advocates on clients' behalf in controversies involving disputed assessments, representing clients before the Bureau of Internal Revenue and the Bureau of Customs.

Kristine Anne obtained her Doctor of Law degree from the Ateneo de Manila in 2005. She is cited as a Next Generation Partner in Tax by the Legal 500 Asia Pacific for 2020 to 2023. More recently, she has been named highly regarded lawyer for General corporate tax, and Women in tax by ITR World Tax 2023.

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**Ria Muhariastuti**

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Ria Muhariastuti is a Senior Tax Specialist in the Tax & Customs practice group of HHP Law Firm, a member firm of Baker McKenzie in Indonesia. She concentrates on domestic and international tax planning relating to inbound and outbound investment, multinational companies and private banking for individuals. She has also assisted clients on matters relating to wealth management and business restructuring.

Ria handles clients from various different sectors such as oil & gas, IT/C, consumer goods and manufacturing. Her extensive experience as well as her tax background allows her to provide comprehensive tax advice on a wide range of transactions.

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**Anlynn Ng**

Senior Associate, Malaysia (Wong & Partners)  
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Anlynn Ng is a senior associate in the Tax, Trade and Wealth Management practice of Wong & Partners.

She has advised clients on matters relating to direct tax planning, corporate tax advice, general tax planning and advisory, and tax compliance. Her practice also extends to tax litigation where she has assisted and advised multinational companies with regards to tax disputes before the courts and tax tribunals.

She also advises and assists clients in respect of wealth management and succession planning matters and compliance matters relating to the anti-profiteering regime in Malaysia.

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**Krystal Ng**

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Krystal Ng is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. Her primary focus is on tax and transfer pricing issues in the context of cross-border transactions as well as post-mergers and acquisitions integration for multinational clients across a wide range of industries.

Chambers Asia Pacific ranked her as a Band 4 practitioner for Tax in 2024, having previously listed her as Up & Coming for Tax in 2021. In the Chambers guide, clients commend her for "always being reliable in providing professional feedback." Krystal is further recognized as a Women in Tax Leader and a Highly Regarded practitioner by International Tax Review. She is also named as a Leading Individual for Tax by Legal 500 Asia Pacific since 2023.

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**Thanh Vinh Nguyen**

Partner, Vietnam

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Thanh Vinh Nguyen is a partner in the Ho Chi Minh City office of Baker McKenzie. Before joining the Firm, he practiced tax and consultancy work for two international accounting firms and worked as a compliance counsel for an international insurance company.

Vinh's areas of practice focus on advice, planning and contentious matters on tax, customs, and trade matters. He also advises clients on tax issues arising from mergers and acquisitions, private equity fund transactions, transfer pricing, indirect taxes, tax controversies, and cross-border tax planning issues for multinational firms operating in various industries including retail & consumer business, manufacturing, financial institutions, property, etc.

Vinh is an award-winning practitioner, recently recognized by the ITR World Tax as Highly Regarded Practitioner in the categories of Indirect and Tax Controversy (2022) as well as a Leading Lawyer for Taxation in Legal 500 Asia Pacific (2022). He is the sole ranked lawyer in Spotlight Table for Tax in Vietnam by Chambers Asia Pacific (2022).

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**Ryutaro Oka**

Partner, Japan

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Ryutaro Oka has significant experience in the finance, trade, energy and manufacturing industries, where he has developed and maintained good client relationships. He regularly advises on complex international tax issues, working extensively with colleagues in the US, UK, Netherlands, China, Singapore and Thailand. Mr. Oka is a frequent speaker on international tax issues, having been invited to speak on international taxation and cross-border private equity investments at events sponsored by the Association of Taxation Analysis, among others. Prior to joining the Firm in 2006, Mr. Oka was a tax director at Deloitte Touche Tohmatsu's Tokyo office, where he advised on international tax issues. Mr. Oka is fluent in English.

Mr. Oka's main practice focus is cross-border M&A taxation. In this connection, he routinely advises on overseas holding company schemes, including the formulation of worldwide tax-efficient acquisition structures, tax due diligence issues, as well as other international taxation matters. He advises as well on the structure of international PE funds and hedge funds. Mr. Oka also advises large family owned companies, and provides succession planning strategies for the founding owners of those companies. Additionally, Mr. Oka handles general taxation matters, including organizational restructuring, and advises regarding Japan's consolidated taxation system.

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**Koji Oshima**

Economist / Counsel, Japan  
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Koji Oshima is an Economist at the Tokyo office. He focuses on transfer pricing and international taxation and provides clients with economic analyses and valuations that assist them in planning and supporting business reorganizations, as well as establishing and documenting global transfer pricing. Prior to joining Baker & McKenzie in 2008, he worked for Deloitte Touche Tohmatsu. He has significant experience advising companies in the automobile, finance, trade, energy and pharmaceutical and medical device industries.

Koji provides support in transfer pricing and international taxation matters for major multinational clients, frequently working with other Baker & McKenzie transfer pricing professionals in the US, UK, Indonesia, Thailand, Germany, China and Singapore. He advises clients on the utilization of advance pricing agreements, transfer pricing documentation projects and pricing research.

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**Frank Pan**

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Frank Pan has over 15 years of experience working in a broad range of trade actions, including advising clients on trade law compliance, export control, trade remedy, and other PRC regulatory and customs issues related to supply chain planning and managing disputes with PRC regulators.

Frank's practice focus are international trade, export control, supply chain trade remedies, and customs audits and investigations.

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**Ponti Partogi**

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Ponti Partogi is head of the Tax and Trade Practice Group at Hadiputranto, Hadinoto & Partners (HHP Law Firm), a member of Baker & McKenzie International. He has been practicing for more than 20 years, focusing on domestic and international tax and trade issues relating to inbound and outbound investment and cross-border corporate exercises including JVs, M&As, divestitures, spin-offs and takeovers.

His combined legal and accounting background allows him to provide comprehensive tax advice on various transactions both from the legal and the accounting perspective.

Ponti is also a seasoned tax litigator who has been assisting clients on matters relating to tax disputes and controversies, transfer pricing, tax credits, double tax treaties, withholding tax, VAT and tax incentives. He has been successfully represented clients from various industries and lines of businesses, including natural resources, manufacturing and trading and services, in their tax litigation processes at the Tax Court and the Supreme Court, several of which have become key landmark cases in Indonesia.

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**Lydia Peh**

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Lydia Peh is a senior associate in Baker McKenzie's Hong Kong office and a member of the Firm's Tax & Trade Practice Group. Her practice focuses on PRC tax advisory and corporate tax planning for foreign inbound investment, corporate reorganizations and M&A for international companies.

Her practice area also includes transfer pricing in the PRC, and she has assisted clients in advance pricing arrangements negotiations with the Chinese tax authorities.

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**Salim Rahim**

Partner, United States  
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Salim Rahim is the chair of the Firm's North America Tax Practice Group. He has extensive experience in transfer pricing matters, including transfer pricing planning, compliance, and tax controversy. He has represented clients in all administrative phases of a controversy. Salim has also represented companies in various alternative dispute resolution forums, particularly the Advance Pricing & Mutual Agreement Program.

Salim is a frequent speaker on transfer pricing matters in seminars sponsored by various organizations and universities. He also participates in programs sponsored by Bloomberg BNA, Alliance for Tax, Legal and Accounting Seminars (ATLAS), Tax Executives Institute (TEI), International Tax Review, Organization for International Investment and the American Bar Association.

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**Roberto Reyes**

Associate, Philippines (Quisumbing Torres)  
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Roberto Romalio G. Reyes is an associate in the Tax Practice Group of Quisumbing Torres. He is a member of the Firm's Consumer Goods & Retail Industry Group.

Roberto is a Certified Public Accountant (CPA) and a member of the Philippine Bar.

In 2014, he obtained his Bachelor of Science in Accountancy degree (Honorable Mention) from De La Salle University (DLSU). He took and passed the CPA licensure exam while in law school. In 2018, he received his Juris Doctor degree from Ateneo de Manila University. His Juris Doctor thesis was published in the Ateneo Law Journal (Volume 65, Issue No. 4). He was admitted to the Bar in 2019.

Roberto is also a part-time lecturer in DLSU.

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**Keerati Saneewong Na Ayudthaya**

Partner, Thailand

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Keerati Saneewong Na Ayudthaya is a partner in Baker McKenzie's Bangkok office. He joined Baker McKenzie in 2013 and is currently active in the Tax Practice Group and the International Commercial & Trade Practice Group. Prior to joining the Firm, he worked as an in-house lawyer at a leading automotive company, at which his areas of practice were general corporate matters, labour law, intellectual property law and customs law.

With 10 years of practice in tax, customs and trade controversies, Keerati helps clients with a comprehensive range of services, including post-reviews, post-clearance audits, negotiation, settlement with relevant authorities, appeals, and litigation. He has assisted clients during all stages of business, including planning, business structuring, implementation, investment, and dispute resolution.

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**David Schultz**

Consultant, Australia

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David Schultz is a senior consultant in Baker McKenzie's Sydney office. David has over 14 years of tax experience in both the UK and Australia. He advises clients in relation to cross-border tax planning, IP structures, corporate finance, and corporate reorganisations.

Over the past several years he has had a particular focus on the OECD's Pillar 2 rules, and he regularly advises clients on the impact of the Pillar 2 rules on financing and IP holding structures in both the UK, Europe and Australia. David has also published multiple articles in the UK Tax Journal as well as publications for the Tax Institute of Australia and in the journal 'Taxation in Australia'.

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**Panya Sittisakonsin**

Partner, Thailand

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Panya Sittisakonsin joined Baker McKenzie in 2002 and became a Partner in 2012. He is currently a partner in the Tax Practice Group. He is also active in the International Commercial & Trade Practice Group, focusing on customs and supply chain issues.

During his 23 years of practice with the Firm, he has been recognized for advising clients on highly complex tax structures, offshore investment, international tax planning, tax disputes, and tax litigation. His practice also includes boutique tax areas, e.g. wealth management, customs duty, excise tax, tax audits, and transfer pricing.

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**Geoffrey Soh**

Head, Transfer Pricing, Thailand  
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Geoffrey Soh joined Baker McKenzie's Tax Practice Group in 2020 to lead our transfer pricing practice of economists and tax lawyers. He has over 26 years of experience in transfer pricing in Thailand, Singapore and Canada.

Prior to joining Baker McKenzie, Geoff was the head of transfer pricing in Singapore for a Big Four audit firm, where he managed a dedicated team of over 40 partners/directors and consultants. He also served on the steering committee of their global transfer pricing practice.

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**Jeremiah Soh**

Local Principal, Singapore  
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Jeremiah Soh has a focus in dealing with tax controversies and disputes with the tax authorities. He has been involved in representing clients in tax appeals before all levels of the Singapore courts, and has successfully assisted clients in achieving favorable outcomes in some reported landmark decisions. He has also assisted clients to achieve cost-effective solutions by resolving disputes with the tax authorities through effective advocacy outside the tax appeal process.

Jeremiah's practice also includes tax advisory and consultancy work for various multinational companies, and has advised on a spectrum of cross-border and domestic tax matters.

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**Gary Sprague**

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Gary Sprague is a partner with Baker McKenzie based in Palo Alto. His practice focuses on advice to software, digital services and high-tech companies. Early involvement in international tax policy matters included serving as chair of the business representatives selected by the OECD to participate in the OECD Technical Advisory Group on Tax Treaty Characterisation Issues Arising from E-Commerce. He also was appointed by the OECD to serve as the business co-chair on the Technical Advisory Group on Monitoring the Application of Existing Treaty Norms for the Taxation of Business Profits. He was the Co-General Reporter for the subject Taxation of Income Derived from Electronic Commerce for the International Fiscal Association 2001 Congress, and is a co-author of BNA Tax Management Portfolio No. 555, Federal Taxation of Software and E-Commerce. He was the General Reporter for the subject Big Data and Tax – Domestic and International Taxation of Data Driven Business for the International Fiscal Association 2022 Congress. He has published over 100 articles on various U.S. and international tax topics. He serves as adjunct professor of tax law at UC College of the Law, San Francisco. Recently he was invited to testify in front of the U.S. House Ways & Means Subcommittee on Tax regarding the proposed Pillar 1 revisions to the international tax framework.

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**Alexandra Stead**

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Alexandra Stead is a special counsel in the tax team in Sydney.

Alexandra's focus is on Australian income tax planning in relation to cross border investment, advising clients across the real estate, technology, healthcare, infrastructure, energy and consumer goods industries.

Alexandra has advised multinational companies in relation to the tax implications of establishing new business lines in Australia, including permanent establishment exposure. She has also worked extensively with clients undertaking corporate acquisitions and restructures in Australia, and regularly assists clients with tax controversy and transfer pricing matters, both in Australia and in overseas jurisdictions.

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**Doug Suh**

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Doug Suh is senior advisor with the tax practice of Baker McKenzie & KL Partners Joint Venture Law Firm. Doug advises on various tax issues for both inbound and outbound clients.

Doug's practice focuses on transfer pricing and overseas investment. He has extensive experience in transfer pricing, including Advance Pricing Agreements (APA), Mutual Agreement Procedures (MAP), tax audit defense, global transfer pricing planning, and representing taxpayers in transfer pricing legislation and tax appeals. Doug is also well-versed in customs-related work, particularly Advance Customs Valuation Arrangements (ACVA). He has considerable experience in the tax systems of various countries, including China and Southeast Asian nations such as Vietnam and Indonesia, serving as a leading advisor to clients operating on the global stage.

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**Jeff Sum**

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Jeff Sum is a senior associate in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. His focus is on tax litigation, audit and investigations. He primarily assists clients on tax litigation matters relating to goods and services tax, income tax, petroleum income tax, real property gains tax, transfer pricing, withholding tax, general tax incentives, and stamp duty. He regularly appears before the national courts and tax tribunals, representing clients on landmark tax disputes and precedent setting cases. Jeff is also experienced in civil and commercial litigation, where he has dealt with matters involving the laws of contract, tort and land, corporate law and asset recovery in fraud matters.

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**Ivy Tan**

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Ivy Tan advises clients on a broad range of trade and customs matters, including cross border supply chain strategies, customs valuation and classification, use of free trade agreements and special customs areas, import and export restrictions, export control and sanctions, trade remedies, customs audit and controversies, and other domestic regulatory issues. Ivy also advises on indirect tax issues and is well versed in tax and supply chain planning.

Ivy has broad regional experience having previously worked at Baker & McKenzie's Kuala Lumpur and Hong Kong offices, prior to joining the Singapore office.

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**Luke Tanner**

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Luke Tanner is a member of the Tax & Transfer Pricing Group at Baker McKenzie's Tokyo office. Prior to joining the Firm, he worked at a Big Four accounting firm in Japan and Australia, where he provided tax and transfer pricing services to multinational clients.

Luke focuses on tax and transfer pricing for Japanese and foreign corporations and assists in planning, implementing and supporting his clients' corporate tax positions. He is experienced in complex international tax matters and cross-border M&A transactions, including due diligence, reviewing financial models and legal agreements, financing and structuring, tax-effective profit repatriation and exit strategies. Luke is also experienced in transfer pricing matters, including pricing policies involving profit splits and intellectual property transactions, permanent establishment profit attribution and intra-group financing. He has a track record of tax controversy support, including assistance with tax and transfer pricing audits and obtaining bilateral APA and MAP agreements.

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**Aek Tantisattamo**

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Aek Tantisattamo has over 18 years' experience working in international law firms. He joined the Tax Practice Group of Baker McKenzie in 2004, after practicing at another international law firm in Bangkok in the Litigation, International Capital Markets, and Banking & Finance Practice Groups.

Aek provides legal advice on tax law, mergers and acquisitions, tax planning for outbound and inbound investments, customs, transfer pricing, securities regulations, Bank of Thailand regulations, rehabilitation law, and civil and commercial law. In addition, he has been involved in completing a number of major transactions, as well as resolving tax audits and disputes, which involve careful handling and negotiation with the Thai Revenue Department.

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**Ngoc Trung Tran**

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Ngoc Trung Tran is a senior regulatory advisor in our tax practice, specialising in international trade, customs and tax services. Tran focuses particularly on international trade and compliance including transactional documentation, advising on accessing to Vietnamese market in aspects of tax, customs, technical barriers, and international commitments.

He also has experience advising clients on customs and tax issues (Import Duty, VAT, SCT) for exports and imports of various categories, including administrative complaints, litigations, day-to-day business advice, trade remedies, including AD/CVD investigations, safeguard, etc. as well as transfer pricing and tax treaty exemption.

Tran, as a former senior government official, has assisted clients in various advocacy works in customs and tax issues.

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**Jason Wen**

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Jason Wen's practice focuses on PRC business and tax law related to foreign investment, disputes with tax authorities, PRC transfer pricing, mergers and acquisitions. He has over 18 years' experience in advising China tax and investment.

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**Shanwu Yuan**

International Tax Director, United States  
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Shanwu Yuan has over 24 years' experience in advising China tax issues. Previously, Mr. Yuan worked for the State Administration of Taxation (SAT) of China from 1995 to 2012. He represented the SAT, and in turn China, in various international tax arenas. He was a frequent participant in the OECD Working Party 6 on the Taxation of Multinational Enterprises, and an active contributor to the OECD work on intangibles and other topics. He was a member of the UN Subcommittee on Transfer Pricing.

In the SAT, Mr. Yuan held various positions. He worked on corporate tax policy for foreign investment, and was a member of the drafting team for the new Enterprise Income Tax Law, which entered into force in 2008. After 2009, he focused on international tax matters such as TP, information exchange between governments on tax matters and international cooperation. He also spent four years assisting the Chief Economist of SAT.

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**Yeo Joon Yun**

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Yeo Joon Yun is an Advisor at Tax Practice of Baker McKenzie & KL Partners Joint Venture Law Firm. Yeo Joon focuses on advising inbound and outbound clients on various tax issues arising from cross-border corporate transactions. He has handled various M&A transactions, including buyouts and strategic investments, effectively advising on both inbound and outbound deals. He has extensive experience in advising private equity investors, including providing tax compliance services for acquisition vehicles and distributing entities (PEFs). He has also represented both domestic and foreign companies in tax audits.

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**Luis Zhang**

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Luis Zhang's practice focuses on tax in PRC, with an emphasis on tax planning, tax controversy and litigation, as well as tax advice for M&A and corporate restructuring. He has also been involved in many direct and indirect transaction cases in the PRC. Mr. Zhang has over 17 years' experience in China tax issues. Before joining Baker McKenzie, Mr. Zhang worked at the Shanghai Tax Bureau for seven years, mainly focusing on international tax administration.

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## Guest Speakers



**Jillian Lim**

Executive Vice President  
Singapore Economic Development Board (EDB)

Ms Jillian Lim is the Executive Vice President of the Singapore Economic Development Board (EDB) and a member of EDB's Executive Committee. She oversees initiatives in planning, policies and products that enhance Singapore's position as a global centre for business, innovation and talent. Aside from subject matter expertise in taxation and trade, her role involves management of a competitive portfolio of incentives to promote business growth and economic activities in Singapore.

Jillian is also EDB's Chief Digital Strategy Officer, driving internal digital innovation and transformation, and IT operations. She is passionate about building organisational capabilities in product management, agile approaches, user research and design thinking, as well as promoting networks and exchanges on best industry practices.



**David Lui**

Deputy Commissioner, Indirect Taxes, Law & Investigation Group  
Inland Revenue Authority of Singapore

Dennis Lui is Deputy Commissioner (Indirect Taxes, Law and Investigation Group) at the Inland Revenue Authority of Singapore and concurrently the CEO of Tax Academy of Singapore.

Previously, Dennis led more than 500 Shared Service Professionals as Chief Executive of VITAL - the Central Agency for Shared Services in the Singapore Public Sector for 4 years.



**Sanjiv Malhotra**

Head of Tax Practice  
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Sanjiv Malhotra has more than two decades of experience in tax and regulatory matters with a focus on international tax, tax disputes, M&A, tax policy and transfer pricing (including Advance Pricing Agreements). Between 2015 and 2019, Sanjiv was based in Baker McKenzie's Singapore office where he was a member of Baker McKenzie's Global Transfer Pricing Steering committee and Baker McKenzie's India Focus Group Steering Committee. Sanjiv regularly participates in national and international discussions on policy aspects of international tax and transfer pricing. Sanjiv's articles have been published by media houses, including Bureau of National Affairs (BNA), International Taxation, International Fiscal Association (IFA) and Euromoney. He regularly speaks in national and international seminars in relation to India tax and regulatory matters.