

GALINA GUBAREVA

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Education

Dec 17 – Dec 20	Chartered Institute of Taxation (CIOT), UK	Advanced Diploma in International Taxation
Sep 04 - Oct 06	Donetsk National Technical University, Ukraine	Master's of International Economics

Work Experience

Mar 21 - present **Forvis Mazars Ukraine**
Transfer Pricing & Tax Services Manager
Transfer Pricing Assistant Manager
Transfer Pricing Senior Consultant

Role:

- Transfer pricing:
 - Develop TP Documentation (Local Files, Master File) which includes market review, benchmarking, FAR analysis, comparative analysis and cooperativity adjustments, economic analysis, interviews with clients, etc. for various types of controlled transactions (commodities, services, royalties, loans, etc.).
 - Prepare annual TP reporting for tax authorities, TP analysis, legal advices and TP queries from clients and tax authorities
 - Participate in development of TP policies, Defence File (business purpose)
 - Conducted external webinars, provided training and guidance to juniors
- Tax advisory:
 - Prepare legal advices for local and foreign companies on withholding tax, double tax treaties, permanent establishment, tax residency, etc.
 - Analyse clients' contracts & supporting documents for tax & compliance risks.
- Business development:
 - Develop new product offerings to meet market demand
 - Develop training materials on transfer pricing best practices for employees.

Nov 19 – Jan 21 **PwC Ukraine**
Tax Consultant

Role:

- Global operations structuring: BEPS health-check of existing business structures, development of target structure, business model revision incl. permanent establishment and tax residency risks assessment, etc.
- Business protection: defence file for DTT benefits, BO status, principle purpose test, etc.
- Business growth & expansion: comparative analysis of jurisdictions and tax regimes, etc.

Nov 13 – Sep 19 **Finance Business Service, Ukraine**
Head of Corporate Department

Role:

- Incorporated non-resident legal entities in UK, Cyprus, UAE, Estonia, Malta, Hong Kong, Hungary and other jurisdictions, including due diligence/KYC procedures.
- Maintained non-resident companies in good standing, incl. filing financial reports, renewing trade & financial licences.
- Developed a large client base and generated numerous business leads.

Apr 09 - Mar 13 **HLB Ukraine LLC**
Senior manager – International Relations Department

Role: Managed projects for foreign clients, compiled audit deliverables, due diligence reports and commercial offers

Mar 07 - Mar 09 **Elias Christofi & Co, Cyprus**
Senior Manager – Corporate services

Role: Incorporated Cyprus and offshore companies, and maintained corporate compliance (due diligence, bookkeeping, annual accounts, financial statements, etc.)

Skills

- International tax
- Tax advisory (incl. BEPS, WHT)
- Transfer pricing (OECD TPG)
- EU Direct Taxes
- Company incorporation
- Due Diligence/KYC
- Project management
- Business development

Certifications & trainings

- Transfer Pricing (2020)
- EU Direct Tax (2019)
- European Business Law: Fundamentals (2019)
- Principles of International Taxation (2018)
- Rethinking International Tax Law (2018)

Languages

- English (Fluent)
- Russian/Ukrainian (mother tongues)
- French (Beginner)

Interests

- Social freelancing (non-profit journalism) - writing /translating articles on culture for e-magazine
- Blogging (travelling), reading.