

# SHEENA BASSANI, LL.B., B.C.L.

## Profile

Sheena possesses ten years of experience in international tax / transfer pricing gained at global professional services firms (8 of which specializing only in transfer pricing), has experience working in industry (MBIA-Ambac in Paris - in the financial services sector), has worked in two different continents in both French and English, and has earned professional designations in both France and Canada. From advising small MNE's to delivering complex projects such as multi-billion dollar interest rate and guarantee fee analyses, and 9-digit intra-group service allocations, Sheena has greatly benefited from the insights and training of the brightest PhD economists, lawyers and prior tax authority officials in the country.

The first ten years of Sheena's career were spent working in international tax - transfer pricing at two of the leading professional services firm in the world. Beginning in 1999 at Landwell in Paris (PricewaterhouseCoopers in France), Sheena transferred to the firm's Montreal office in 2001 where she was promoted to Manager within the Transfer Pricing team. Sheena joined Deloitte's Transfer Pricing team in 2005 where she was promoted to Senior Manager. She remained at Deloitte until 2009, at which time she decided to start her own Transfer Pricing consulting practice. Sheena holds a Bachelor of Civil Law and a Bachelor of Common Law from McGill University. She is a member of the Quebec Bar Association and was called to the Paris Bar in January 2001.

From planning/advising to documentation and dispute resolution involving one or more tax authorities, Sheena is happy to put her expertise into action for her clients.

## Experience

SENIOR MANAGER, DELOITTE, MONTREAL, CANADA - 2005-2009

Senior manager in transfer pricing, covering broadest range of technical projects and working with many of Deloitte's talented transfer pricing partners, such as Muris Dujic, Sandra Goldberg, Brad Rolph, Gary Zed, John Oatway and Phil Fortier. Additional marketplace responsibilities included presenting at and organizing conferences and contributions to the workplace Diversity initiative.

MANAGER, PRICEWATERHOUSECOOPERS, MONTREAL, CANADA - 2001-2005

Manager in transfer pricing focusing on documentation and dispute resolution, under the guidance of Claude Lemelin, previously Canada's designated Competent Authority. Additional marketplace responsibilities included acting as representative of the France-Canada Chamber of Commerce, active involvement in the cross-lines of service and other marketplace initiatives.

ASSOCIATE, LANDWELL (TAX & LEGAL DEPARTMENT OF PWC IN FRANCE), PARIS, FRANCE - 1999-2001

Associate in a large team with a focus on the IT, communications, entertainment and media industry. Primarily focused on international tax engagements, including a two-week assignment in New Caledonia (an overseas territory of France located in the Pacific Ocean).

TAX, LEGAL AND OFFICE MANAGER, MBIA-AMBAC, PARIS, FRANCE - 1998

Managed tax, legal and office matters for the French joint-venture of the two global leaders in bond insurance, including French aspects of the acquisition of a global competitor. Introduction to risk analysis, trained by General Manager in France.

## Education

McGill University, Montreal, Canada - LL.B. (Common Law), 1997

McGill University, Montreal, Canada - B.C.L. (Civil Law), 1997

McGill University, Montreal, Canada - Pre-law studies (1.5 years, enrolled in Political Science Honors Program)

University of Alberta, Edmonton, Canada - Pre-law studies (2 years, enrolled in Political Science and Philosophy)

## Professional Qualifications/Certifications

Quebec Bar Association, 2000-present

Bar Association in France, 2001-present

Canadian Securities Course - Certificate of Successful Completion, 2000

## Presentations

- Transfer Pricing Break-Out Session, Tax Executive Institute, Professional Development Day, Montreal, 2008
- Understanding Transfer Pricing Methods, Montreal, 2008
- Implementing and Monitoring the Transfer Pricing Policy, presented in collaboration with transfer pricing experts from industry, Montreal, 2008
- Transfer Pricing, Year-End Tax Planning for Private Companies, Tax Wednesdays Series, Montreal, 2007
- Transfer Pricing and International Financial Reporting Standards, Montreal, 2005
- Transfer Pricing Dispute Resolution Conference, Montreal, 2004
- Transfer Pricing: What Bio-tech and Pharma Companies Should Know, Presented in collaboration with BioQuebec, 2004
- How to Fill out a T106 Form – Practice Seminar, Montreal, 2004
- Transfer Pricing in Quebec and Canada, Presented to members of the French Chamber of Commerce in Montreal, 2002
- Numerous internal training sessions (e.g., Transfer Pricing Methods, Filing Obligations, Definition of Contemporaneous Documentation, Statute of Limitations, Penalties, Dispute Resolution, Transfer Pricing Valuations)

## Publications

- “Canada Revenue Agency Issues New Form T106,” Arm’s Length Standard, February/March 2009
- “Canadian Court Dismisses Government Motion in GE Case,” Global Transfer Pricing Alert 08-012, 16 June 2008
- “OECD Invites Public Comment on TP Comparability Issues,” Arm’s Length Standard, June/July 2006
- “International Expansion of Quebec Inc.,” accepted by APFF Conference Collection, 2005
- “New Quebec Transfer Pricing Legislation,” Transcend, January 2002

## Language Skills

English, French (fluent in both)

## Referrals

Available upon request