



Theo Elshof

Managing Director

Professional Background

Theo is a Managing Director of Quanter Global and has more than 25 years of experience in international tax, transfer pricing and tax control frameworks.

His experience includes active participation in competent authority APAs and Mutual Agreement Procedures, design, planning, implementation and defence of restructuring projects, transfer pricing controversy / audits, tax and transfer pricing control frameworks. He has lead a multilateral APA team involving four countries and has extensive experience in profit splits based on PCA and RACI.

Before joining Quanter Global, Theo worked for a large global transfer pricing firm, was a Senior Director of the Transfer Pricing team of a Big 4 firm in the Netherlands and was head of the APA-team of the Dutch Tax Authorities (DTA). In this role he was part of the Competent Authority team for the Ministry of Finance and was a key member of the Transfer Pricing Group of the DTA. As such he gained experience in APAs, Mutual Agreement Procedures and Tax Audits. Before joining the DTA, Theo was head of Tax and Control for two stock listed MNO's.

As an industry leader, Theo is a regular speaker at seminars and round tables on global transfer pricing tax risk assessment and management.

Qualifications

- Degrees in Economics/Tax and Controlling from the Universities of Brabant and Limburg.
- Tax Assurance Course, Nijenrode University.

Proven Track Record

- Was responsible for numerous transfer pricing audits, multilateral APAs and Mutual Agreement Procedures.
- Managed transfer pricing aspects of global projects in the field of business model restructuring, supply chain integration and finance.
- Has advised and been involved in transfer pricing projects in all industries in various positions (head of tax MNO's, DTA and advisory role).
- Has expertise in the design and documentation of transfer pricing policies in respect of goods, services, intellectual property, finance, tax controversy, transfer pricing tax, risk assessment and management.

Capabilities

- Full circle of transfer pricing, from planning, design and implementation to defence and documentation.
- Transfer pricing controversy / audits, APAs, Mutual agreement procedures.
- Partner in defining and implementing optimal transfer pricing strategy.
- Fluent in Dutch, English and German.

