

Johann Müller

Managing Director, Denmark

Professional Background

Johann is the Managing Director of Quanteria Global for Denmark and has more than 25 years of experience in international corporate income tax, transfer pricing and EU tax law.

His experience includes working as an adviser in Amsterdam, London and New York, besides Copenhagen, where he assisted in an array of international transactions.

He has been deputy head of tax of a global 150 group and head of tax of several of their divisions. In that capacity, he has lead the tax work on several global restructurings, has done negotiations with many foreign tax authorities (in Europe, Asia and Africa). During this period, he also gained extensive knowledge of the intercompany transactions of the offshore service industry. Finally, he has been leading groups in tax advocacy, both before the OECD and the EU.

He has been a case handler for the Danish competent authority on transfer pricing dealing with several bilateral and multilateral MAP and APA cases; he also represented Denmark as a delegate at the OECD working party 6 (transfer pricing) before and during BEPS.

Qualifications

- Degree in tax law from the university of Amsterdam.
- A certificate in US international corporate taxation from the university of Leiden.
- The Advanced Diploma in International Taxation from Chartered Institute of Taxation in the UK.

Proven Track Record

- Has dealt with the transfer pricing aspects of several business restructurings involving companies across the globe.
- Has dealt with transfer pricing from an adviser, a taxpayer and a government official perspective.
- Has done several business case studies into possible business restructurings, involving extensive analyses on the transfer pricing consequences of such cases.
- Published a book "The Netherlands in International tax planning" with the IBFD in 2008 and self-published a practical summary of the OECD transfer pricing guidelines on Amazon (last updated 2017).

Capabilities

- Full circle of transfer pricing, from planning, design and implementation to defence and documentation.
- Fluent with IT, and capable of working with financial systems such as Cognos and Hyperion to work with consolidated financial data through programming in Excel.
- An eye for keeping solutions practical, and solutions sustainable.
- Fluent in English, Dutch and Danish.