

## Sabine Wahl

Sanofi-aventis, 46 quai de la Rapee, 75601 Paris cedex 12, France

☎ : +33 1 55 71 01 99

French nationality

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### Professional Experience

**sanofi-aventis – Paris, France** **October 2005- current**

***Group Transfer Pricing Director***

- Responsible for the management of international transfer pricing team of 15 professionals;
- Responsible for development and implementation of new worldwide transfer pricing model ;
- Negotiation with tax authorities in countries around the world.

**Ernst & Young, LLP Washington, DC – Paris, France** **2002-2005**

***Director***

- Responsible for the development and head of EY European Controversy Team;
- Negotiation of APAs, competent authority cases and audits with various tax authorities;
- Development of worldwide transfer pricing policies for major European-based companies;
- Consultant with the OECD, including direct work with the OECD outreach program;
- Transfer pricing expert for Russian tax administration in E.U. sponsored program.

**Deloitte & Touche, LLP, Washington DC, U.S.** **2000-2002**

***Senior Manager***

- Negotiation of multilateral APAs and competent authority cases on behalf of U.S. based clients;
- Development of worldwide transfer pricing policies for major companies;
- APA liaison with European offices.

**PwC, LLP, Washington, DC/New York, NY, U.S.** **1999-2000**

***Senior Manager***

- Development of models for transfer of intangibles, and implementation of cost sharing agreements;
- Negotiation of bilateral APAs and competent authority cases;
- Transfer pricing advisor with M&A group on deal related transfer-pricing issues.

**Office of Associate Chief Counsel (International)** **1994-1999**

**Advance Pricing Agreement, U.S.**

***Senior Attorney Advisor, Team Leader***

- Responsible for all aspects of the review, negotiations and drafting of multilateral APAs;
- Negotiations with treaty partners including Germany, France, the Netherlands, Canada, and Japan.

**Coopers & Lybrand, Boston, MA, U.S.** **1988-1992**

***Tax Senior Associate***

**Bar Admission** New York State Bar **1993**

**Education** L.L.M., Duke Law School, Durham, NC **1992-1993**  
D.E.S.S. in International Taxation, Paris X – H.E.C., France **1986-1987**  
Certificate of Studies in International Trade, UCLA, CA **1985-1986**  
Master of Law, Paris I Sorbonne, France **1981-1985**

**Language** English, French (native)

**References** Furnished upon request