

Transfer Pricing Tax Manager

Role Overview

Reporting to the Group Tax Director and based in Paris (La Défense), the Transfer Pricing Tax Manager plays a pivotal role in shaping, implementing and safeguarding the Group's global transfer pricing framework. This is a high-visibility position within a French-headquartered international IT group operating in approximately 70 countries.

As the Group's trusted Transfer Pricing expert, you will work closely with Senior Management, regional tax teams, Finance, Accounting, Legal and Operations. You will contribute directly to strategic decision-making, support complex cross-border projects, mitigate tax risk and ensure that the Group's operating model is both tax-efficient and fully compliant.

This role offers a unique opportunity to combine technical Transfer Pricing expertise, business partnering, and strategic exposure in a fast-moving, international environment. It is well suited to a professional who enjoys complex international environments, takes ownership of topics end-to-end, and wants to have a tangible impact on a global organization.

Key Responsibilities

Strategic Transfer Pricing Leadership

- Lead, maintain and continuously enhance the Group's global TP policies and governance framework in line with OECD Guidelines, BEPS principles and substance requirements.
- Oversee global TP compliance, including the Master File and coordination of Local Files across jurisdictions, ensuring consistency and robustness.
- Act as a key advisor on TP aspects of international tax planning, business restructurings, operating model changes and M&A transactions.

Operational Excellence & Global Support

- Determine, review and validate transfer prices for all intercompany transactions in close collaboration with regional and local Tax Managers.
- Support local teams during tax audits and controversies by providing clear TP positions, technical analyses and defensible documentation.
- Monitor pre-tax profit margins across Group entities throughout the year; oversee and coordinate year-end TP adjustments to ensure alignment with policy and economic substance.
- Contribute to the definition and rollout of TP governance processes, including internal guidelines, controls and review mechanisms.
- Deploy a global tool to monitor TP compliance obligations and deadlines worldwide.

Benchmarking, Analysis & Documentation

- Manage global benchmarking studies with external advisors; assess market updates and integrate changes into the Group's TP framework.
- Review and enhance TP documentation prepared by regional teams (TP reports, benchmarking studies, segmented P&Ls, adjustment calculations).
- Assist regions in preparing robust backup files to defend intercompany charges in future tax audits.

Group Charges, Transactions & Data

- Oversee Group-level charges for HQ services, management fees, IP and trademark fees, ensuring appropriate allocation keys, economic justification and strong documentation.
 - Provide expert TP input on cross-border financial transactions (intercompany services, IP, financing arrangements, guarantees, cost recharges).
 - Work with Finance and IT teams to improve TP data quality, traceability and reporting, including reconciliations between TP outcomes and statutory/management accounts.
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Skills, Experience & Competencies

Core Competencies

- Strong analytical mindset with the ability to manage multiple complex workstreams simultaneously.
- Excellent written and verbal communication skills; ability to communicate clearly and persuasively on complex topics to non-tax stakeholders.
- Autonomous, proactive and solution-oriented, with the confidence to interact with Senior Management.
- Solid understanding of IFRS and key accounting concepts relevant to TP.
- Strong project management skills
- Ability to work under tight deadlines while maintaining high-quality deliverables.
- Curious, adaptable and willing to broaden expertise across tax, finance and business operations.
- Excellent interpersonal skills; comfortable working with multicultural, geographically dispersed teams.
- Positive attitude toward change and evolving business needs.

Qualifications & Experience

- Master's degree in Taxation (and ideally Finance, Law or Business).
- 10+ years of experience in TP, including 5 years in a large multinational in-house Tax Department.
- Fluent in French and English, both written and spoken.