

PARTNER - TAX - HEAD OF TRANSFER PRICING

Michele Ghiringhelli

I am Partner at Fieldfisher and Head of Transfer Pricing, a practice that I helped create both within the Italian structure and at international level.

📍 Milan, Italy

+39 02 806731

✉ michele.ghiringhelli@fieldfisher.com

📍 LOCATIONS

[Italy](#)



I provide consultancy on transfer pricing and on the analysis of managerial, organisational and tax characteristics of the business, identifying the “value drivers” within the “value chain”, drafting the Transfer Pricing policy and respective documentation. I also provide assistance in stipulating unilateral and multilateral agreements with the Revenues Agency (APA) and in dealing with the taxation of intellectual property, patent boxes and, more generally, benefits connected to R&D activities.

As this is a cross-sectional discipline within the business field, Transfer Pricing has given me in-depth knowledge of the internal dynamics of companies, as I have come into contact with senior figures of the various departments, collaborating in close contact with colleagues of different disciplines such as legal, HR, VAT, corporate governance and tax litigation.

The analysis of functions and risks within the corporate field has enabled me to develop expertise in the area of tax risk management, cooperative compliance and in the various disciplines involving the structuring of management, monitoring and control systems and the tax risk.

In the past, I have dealt with domestic and international taxation, extraordinary operations, tax structuring and due diligence of companies operating, in particular, in the energy, oil & gas and Information Technology sectors.

I have studied in-depth the IAS/IFRS international accounting standards and published a book regarding the impact of those standards on Italian taxation.

I am a graduate in Economy and Trade. I am a chartered accountant and accounts auditor.

I am a speaker at workshops, international and national courses on Transfer Pricing and international taxation and I regularly publish articles on matters connected to transfer pricing in Italian and international industry journals.

I advise my clients in Italian, English and Spanish.