

# **David A. Nickson**

## Principal



**David Nickson**

*Principal*

*Leader – End to End TP  
Execution Practice*

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### **Background**

- David is a principal in PwC's Transfer Pricing practice, and global leader of our End-to-End Transfer Pricing execution team which focuses on the practical implementation of transfer pricing and value chain transformation planning within client organizations.

### **Professional and Industry Experience**

- David is a commercial international tax professional with over 20 years' experience (15 as partner/principal). He has extensive large company planning and corporate compliance experience, with credentials in the areas of tax-efficient financing, M&A planning, and intellectual property/business structuring. In recent years David has led large project assignments in the area of Transfer Pricing Execution/Operational Transfer Pricing – where TP or VCT strategies have to be cascaded throughout all layers of a company's tax, controllership, and IT functions. These engagements touch upon accounting and system issues, control environment/Sox, training, communication, and process change management.
- His experience includes:
  - End to end process design and remediation ;
  - Implementing tactical technology solutions to solve specific needs (HQ charge-outs, tangible goods price-setting, profit split and revenue split calculations);
  - Configuring ERP and business intelligence systems to optimize for transfer pricing;
  - Providing advanced transfer pricing analytics with SAP/BPC/PCM or Oracle/Hyperion;
  - IT and Controllership readiness for Country by Country Reporting;
  - Improving transfer pricing workflow, documentation, and communication with technology;
  - Improving the accuracy and automation of 'gross profit in inventory' calculations.
- He is a Chartered Accountant, a Chartered Tax Adviser (business tax prize winner), and Enrolled Agent, and holds a First Class Honours Degree from the University of Warwick. In his career David has served as an international tax group leader, an office tax leader, and a major account lead partner.