



Yoko Koga

Tax Director

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Yoko Koga practices the area of International tax focused on Transfer Pricing Taxation. In the other firm she started as well as expanded large TP team and worked as a partner. Her experience in this area is about 23 years with various work such as TP Audit defence, APA, CA negotiation, BEPS documentation. Her clients include companies in a range of sectors including automobile, motor bicycle, rail car, chemicals, food and energy.

Yoko Koga is not a lawyer.

LANGUAGES SPOKEN

- Japanese
- English

- Tax

- Consumer Goods, Food and Retail
- Energy and Natural Resources
- Industrials

Japanese English

- US Japan Bilateral APA as well as competent authority negotiation support for Japanese Automobile parts maker and renewal of APA, 15 years
- France Japan Bilateral APA as well as TP audit for gaming corporation
- England Japan Bilateral APA for gaming corporation
- Singapore Japan Bilateral APA for the corporation of food industry
- Competent Authority negotiation as well as APA support for various countries, (Netherland, Denmark, Germany, Australia ,Indonesia, Malaysia) US, Malaysia, etc.
- Preparation of BEPS (CbCR, master file, local file) for the corporations with various industries.

Prior Experience

- Transfer Pricing Audit Defense
- APA support
- BEPS documentation (CbCR, master file, local file)
- Transfer Pricing Policy support
- Provided Transfer Pricing Seminar, private study session.

Education

- University of California, Berkeley, Business Administration, Graduated December 1989 with Honor, Peat Marwick Main & co. Award
- Passed US CPA

INSIGHTS

Publications

- Co authored “Detail explanation of Transfer Pricing tax rule (principle and case study)”