



### **Edward Nathan Sonnenbergs (ENSafrica)**

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### **Jens Brodbeck**

Executive, ENSafrica

#### **Professional Background**

- Tax executive at ENSafrica.
- Jens has 17 years of tax experience. He started his career as an international tax specialist at Arthur Andersen, with a short stint at KPMG, before joining ENSafrica as a director in their tax department in 2002.
- Jens graduated with his LLB at the University of Munich and obtained his LLM from the University of Cape Town.
- He authored numerous articles on transfer pricing issues and has lectured part-time at the University of the Witwatersrand (Johannesburg).
- Jens is recognized as a leading lawyer by the following reputable rating agencies and their publications:
  - Best Lawyers 2013 – Tax (South Africa)
  - Euromoney Expert Guide 2013 – Tax: Transfer Pricing (South Africa)

#### **Proven Track Record**

- Jens has been the leading practitioner in numerous transfer pricing projects since the introduction of transfer pricing rules in South Africa in 1996, including the provision of transfer pricing planning advice, the preparation of transfer pricing documentation, assisting with transfer pricing audits and settlement agreements.
- He has developed ENSafrica into one of South Africa's leading transfer pricing service providers with a client base including companies such as Anglo Platinum, BMW, Clickatell, Coronation Fund Managers, Engen Petroleum, Experian, Group Five, H & M Hennes & Mauritz AB, Hollard

Insurance, Mane SA, M-Web, Nissan South Africa, Pepkor Retail, RMB Asset Management, Sasol, Super Group or Tiger Brands.

## **Capabilities**

- Jens' areas of specialization include transfer pricing, inbound investments, cross-border tax planning and exchange controls.
- Jens has been involved in the set up South African operations for a number of foreign multinationals and advised on the South African tax and exchange control implications, as well as the development of cross-border financing structures to facilitate the investments.
- He has provided transfer pricing planning advice to South African based and foreign based multinational groups, including international procurement and distribution structures, cost contribution agreements, royalty rate determination etc.
- He has assisted with the preparation of transfer pricing documentation for numerous South African based and foreign based multinational companies.
- He has assisted various multinational groups with their transfer pricing disputes, including the handling of transfer pricing audits and the negotiation of settlement agreements with the South African Revenue Service.