



GLOBAL TRANSFER PRICING SERVICES

# KPMG Europe LLP's Global Transfer Pricing Conference 2009 – Insurance

Managing Transfer Pricing in Turbulent  
Times

**Invitation**

Tuesday, 24 March 2009

World Trade Center – Zurich, Switzerland

TAX

# KPMG Europe LLP's Global Transfer Pricing Conference 2009 – Insurance

## Managing Transfer Pricing in Turbulent Times

Ladies and Gentlemen,

We are delighted to invite you to KPMG Europe LLP's second Global Transfer Pricing Conference that will focus on the management of transfer pricing matters in turbulent times and beyond.

In managing complexity in the insurance industry, it is critical to understand the latest transfer pricing regulatory developments and trends, and to apply those rules to underwriting, branch capital management, transfer of renewal rights and retrocession.

The conference will include several insurance-related workshop sessions giving you a unique chance to:

- Gain an update on recent developments in Europe (e.g. business restructuring), the Americas (e.g. contract manufacturing regulations) and ASPAC (e.g. Chinese final documentation requirements);
- Understand the positions of representatives from tax and transfer pricing authorities from the UK, Germany and Switzerland, as well as the EU Joint Transfer Pricing Forum in managing transfer pricing in challenging and turbulent times;
- Address a number of topical tax and transfer pricing insurance issues specific to the insurance industry including: the Business Restructuring Paper, insurance distribution models and the practical and commercial issues arising from Pan-European Structures.

We very much hope you will benefit from this opportunity to interact with KPMG's tax, transfer pricing and advisory practitioners.

Please use [www.tax-events.ch/insurance](http://www.tax-events.ch/insurance) to register at your earliest convenience, but no later than Monday, 16 March 2009.

We look forward to your participation.

Yours sincerely,



Hugh von Bergen  
KPMG in the UK  
Chairman, Global Insurance Tax  
Group



John Neighbour  
KPMG in the UK  
GTPS FS Sector Leader



Graham Seymour  
KPMG in Switzerland  
International Corporate &  
Insurance Tax Partner

# Programme

## Tuesday, 24 March 2009

World Trade Center, Leutschenbachstrasse 95, 8050 Zurich-Oerlikon

10:00 – 10:30	Registration and Welcome Coffee
10:30 – 10:40	Introduction by Jörg Walker, Managing Partner Tax, KPMG AG, and Markus Wyss, Head of GTPS in Switzerland
10:40 – 12:30	<p>Update on Developments in Transfer Pricing in Europe, Americas and ASPAC by Brian Cody, Steven Tseng and Dirk Van Stappen</p> <p><a href="#">Panel Discussion on Transfer Pricing in Turbulent Times</a> – How to Manage Fundamentally Changed Premises</p> <p><u>Panellists:</u> Lee D. Corrick (Her Majesty’s Revenue and Customs, UK), Angelo Digeronimo (Former Member of Swiss Federal Tax Administration), Dr. Till Zech (German Federal Ministry of Finance), Christian Looks (KPMG), John Neighbour (KPMG), Dirk Van Stappen (EU JTPF and KPMG)</p>
12:30 – 13:50	Lunch
13:50 – 18:00	<p>Insurance Transfer Pricing Workshop Sessions</p> <p><b>Session A</b> ■ Update on Part IV of the OECD’s Report on the Attribution of Profits to Permanent Establishments ■ Business Restructuring – Issues Arising for the Insurance Industry</p> <p><b>Session B</b> ■ Federal Excise Tax – Update on Recent Developments ■ Insurance Distribution Models</p> <p><b>Session C</b> ■ Panel Discussion Examining the Practical and Commercial Issues Arising from Pan-European Structures</p> <p><u>Panellists:</u> Irina Diakonova (ZFS), Martin Howes (Swiss Re), John Neighbour, Philip Heitmann</p>
18:00 – 19:00	Farewell Cocktail

Alternatively, you may choose from one of the general Transfer Pricing Workshop Sessions. For detailed programme information please visit our Website at [www.tax-events.ch/insurance](http://www.tax-events.ch/insurance).

# Speakers

## **Guest and KPMG Speakers on General Sessions**

[Lee D. Corrick](#), Member of Her Majesty's Revenue and Customs, UK – Panellist

[Angelo Digeronimo](#), Former Member of the Swiss Federal Tax Administration – Panellist

[Dr. Till Zech](#), Member of the German Federal Ministry of Finance – Panellist

[Brian Cody](#), GTPS, KPMG St. Louis

[Steven Tseng](#), GTPS, KPMG Shanghai

[Dirk Van Stappen](#), GTPS, KPMG Brussels and Antwerp

## **Guest Speakers on Insurance Topics**

[Irina Diakonova](#), Head of Transfer Pricing, ZFS

[Martin Howes](#), Head of Transfer Pricing, Swiss Re

## **KPMG Speakers on Insurance Topics**

[Philip Heitmann](#), Global Indirect Tax, KPMG Cologne

[Tom Iannozzi](#), US International Tax, KPMG London

[John Neighbour](#), Global Transfer Pricing, KPMG London

[Jaap Reyneveld](#), Global Transfer Pricing, KPMG Amsterdam

[Robin Saunders](#), Global Transfer Pricing, KPMG London

[Steve Seabrooke](#), Corporate Tax, KPMG London

Additional Speakers from KPMG in the UK, in Germany, Switzerland and the Netherlands will speak on general Transfer Pricing Topics.

# Registration and Fee

KPMG Europe LLP's Global Transfer Pricing Conference 2009 – Insurance

- The conference fee is CHF 750 plus VAT at 7.6%. Payment of the registration fee may be made with credit card only.
- You may now register at: [www.tax-events.ch/insurance](http://www.tax-events.ch/insurance).

## **More Information**

For further information about the conference programme, please visit our Website at: [www.tax-events.ch/insurance](http://www.tax-events.ch/insurance).

If you have any questions regarding the conference, please contact us at: [gaemisegger@kpmg.com](mailto:gaemisegger@kpmg.com).

## Organisation

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