



GLOBAL TRANSFER PRICING SERVICES

# KPMG Europe LLP's Global Transfer Pricing Conference 2009

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

## 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.

It is common sense to state that transfer pricing is not simply a tax compliance matter, but represents the interface between tax and operations, and thus should be embedded in business strategy and processes. However, such undertakings are becoming more challenging while business operations are experiencing unprecedented conditions on top of constant business, legislative and administrative changes that transfer pricing needs to adapt to.

This year's conference gives you a unique chance to:

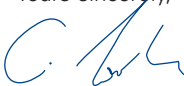
- Gain an update on recent developments in Europe (e.g. business restructuring), the Americas (e.g. contract manufacturing regulations) and ASPAC (e.g. Chinese final documentation requirements);
- Understand the positions of representatives from tax and transfer pricing authorities from the UK, Germany and Switzerland, as well as from the EU Joint Transfer Pricing Forum in managing transfer pricing in challenging and turbulent times;
- Address hot tax and transfer pricing topics, including: *Business Restructuring*, *Alternative Views on Methods*, *Comparability and Documentation Approaches* as well as *Ways to Address Transfer Pricing related Uncertain Tax Positions*. These will be discussed in detail in the afternoon breakout sessions and on Q&A desks.

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

We look forward to your participation.

Yours sincerely,



Christian Looks  
KPMG in Germany  
Head of GTPS KPMG Europe



John Neighbour  
KPMG in the UK  
Head of GTPS in the UK



Markus Wyss  
KPMG in Switzerland  
Head of GTPS in Switzerland

# 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><a href="#">Update on Developments in Transfer Pricing in Europe, Americas and ASPAC</a> 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 the 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><b>Workshop Sessions</b></p> <ol style="list-style-type: none"><li>I. <a href="#">Dealing with the Authorities</a> – Transfer Pricing Audits, APA, MAP</li><li>II. <a href="#">Increased Scrutiny of Uncertain Tax Positions</a> – Risks and Controls</li><li>III. <a href="#">Challenges of Business Restructurings</a> – Real Value Drivers</li><li>IV. <a href="#">Evolution in Methods and Approaches</a> – Profit Split and Beyond</li><li>V. <a href="#">TESCM</a> – Hotspot Switzerland (ETH and HSG Whitepaper)</li></ol> <p><b>Q&amp;A Desks (Several Meeting Slots)</b></p> <ol style="list-style-type: none"><li>a. Managing Transfer Pricing in China and other ASPAC Countries</li><li>b. How to manage VAT &amp; Customs along with Transfer Pricing</li></ol>
18:00 – 19:00	Farewell Cocktail

# Speakers

## Guest Speakers

**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

## KPMG Speakers

**Brian Cody**, GTPS, KPMG St. Louis – Speaker, Plenary Session and WS II  
**Yves Hervé**, GTPS, KPMG Frankfurt – Moderator of WS IV  
**Andrew Hickman**, GTPS, KPMG London – Moderator of WS II  
**Hartwig Hoffmann**, Tax, KPMG Zurich – Moderator of WS V  
**Matthias Kaut**, GTPS, KPMG Düsseldorf – Moderator of WS III  
**Alexander Loh**, GTPS, KPMG Frankfurt – Speaker, WS I  
**Christian Looks**, GTPS, KPMG Frankfurt – Panellist  
**Stuart McDougall**, GTPS, KPMG Leeds – Speaker, WS III  
**John Neighbour**, GTPS, KPMG London – Panellist  
**Andreas Russi**, VAT, KPMG Zurich – VAT / Customs Q&A Desk  
**Richard Slimmen**, GTPS, KPMG Meijburg in Rotterdam – Moderator of WS I  
**Steven Tseng**, GTPS, KPMG Shanghai – Speaker, Plenary Session and China / ASPAC Q&A Desk  
**Dirk Van Stappen**, GTPS, KPMG Brussels and Antwerp, Member of the EU Joint Transfer Pricing Forum – Panellist and Speaker, WS II  
**Markus Wyss**, GTPS, KPMG Zurich – Speaker and Moderator of the Panel

Additional KPMG Tax, Transfer Pricing and Advisory Professionals will speak on the Afternoon Workshop Sessions.

# Registration and Fee

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- 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/tp](http://www.tax-events.ch/tp).

## **More Information**

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

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

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