

5 minutes with the Swiss Transfer Pricing team

The KPMG Switzerland Transfer Pricing team would like to introduce you to the people working daily with multinationals on various transfer pricing matters. Whether you've already met some of them in person or not, take time to learn more about them and how they support their clients.



Gerhard Foth

Years in Transfer Pricing, position:

20 years, Head of the KPMG Transfer Pricing practice

Private facts about myself: I like spending time outdoors hiking, camping and the like, especially with my wife and two kids, so coming from Germany to Switzerland in 2008 was really an upgrade. My other big passion is reading; my house is full of books.



Pasha Naeem

Years in Transfer Pricing, position:

Soon 2 years, Senior Consultant

Special transfer pricing skills:

Support with CbCR filings and controversy cases such as Advanced Pricing Agreements (APAs) and tax audits

My soft skills: Listening and empathy

Private facts about myself: I have participated in evening hunting courses with a colleague at KPMG, while baking and taking care of orchids help me to relax and switch off.

high school. I then went on to study in a non-tax area: Engineering and Management at the Zurich University of Applied Sciences. During the initial COVID-19 restrictions, I was looking for new opportunities to broaden my horizon and while hiking, a friend mentioned that my profile could be a good fit within his firm, which turned out to be KPMG. Initially I thought that I was lacking the skills required for an accounting firm since I was not really exposed to audit, tax or accounting experience in the past. However, I decided to give it a chance and I got invited for an interview in the Transfer Pricing practice. While researching for the job interview I found that the more I went down the OECD rabbit hole, the more captivating it became! Previously, I was just reading about MNEs avoiding taxes or being involved in aggressive profit shifting without really understanding the key mechanisms and challenges.

What brought you into such a niche field as transfer pricing?

Gerhard Foth: I studied economics, and had you asked me during university where I would work in the future, a Big Four accounting firm was certainly not on the list. So, I suppose I just stumbled into this field and now I see it as one of the big lucky moments in my life. I've never

regretted working in this field – you get to look deeply into how companies operate, and you learn something new every day in KPMG's diverse and multi-skilled environment.

Pasha Naeem: My previous working background was primarily in the engineering industry as I undertook vocational training in this field after

What motivates you most at your work and what were the main challenges you faced this year?

Pasha Naeem: My main motivation is related to the holistic view across the entire value chain of a business, which is usually far more intricate than merely the supply chain. It

means you don't work only on tax-related topics, you actively review and enhance the entire business model and the way the company operates. Another favorite aspect for me is the opportunity to assess value chains implemented across different industries and occasionally value chains of main competitors within the same industry.

Something I've found quite challenging recently is the coordination between various teams and working culture. This is particularly difficult during bilateral APAs, for example, since you have many different stakeholders with a variety of different objectives. For example, I worked on a project involving tax authorities from two different countries, two local KPMG offices involved, and in the case at hand, also two different principal entities within the same company. With a topic like transfer pricing where there are no clear-cut black or white answers, this can be challenging and fascinating at the same time.

Why should clients come to you with their questions on transfer pricing?

Gerhard Foth: I like to connect the many different interfaces that transfer prices have: performance management, incentives, finance processes, tax, accounting, etc.



Solving problems for clients holistically is something that is really important to me.

Gerhard Foth

Solving problems for clients holistically is something that's really important to me – rather than simply solving isolated issues.

What do you like most about the people you work with?

Pasha Naeem: The team is young and dynamic. What I really appreciate, is the diversity of the team members especially the differences in educational background, previous work experience as well as origins. It is very enriching.

Gerhard Foth: What impresses me most about KPMG is that – although there are so many different people – almost everyone is really nice. So not only in Switzerland or Germany, but in many places around the world, colleagues have become friends. I consider it a real privilege to work in such a great company. And what's true for colleagues around the world is even more so for my team here in Switzerland. Working together with people you trust and whose company you enjoy is fun (almost) every day.

How do you work with the team in your current position?

Pasha Naeem: I collaborate with both experienced and junior team members without restriction, which makes our team spirit and working experience unique. We have a very lean management structure within our team and are not hierarchically organized at all. It means we get to work a lot directly with the directors and partners – we have a lot of common projects directly just with Gerhard.

What's your working style when working together on a project? What were your favorite shared projects over the last year?

Both: We are both of the view that it's important to listen to your clients, understand the problem they have identified and then solve it. In the process, you also need to connect the



Continuously strive to comprehend the effective needs behind the mere assistance request from a client.

Pasha Naeem

different interfaces with transfer pricing, be that audit, indirect taxes or supply chain. With this in mind, it's particularly nice to work for medium-sized companies because they really appreciate our capabilities to provide all-in-one support and you can then have a bigger impact. You can help to really make a difference in the way they conduct their business.

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