

MAKING THE MOST OF DOUBLE TAX AGREEMENTS

DATE	VENUE
23 JULY 2010	RENAISSANCE HOTEL, MALACCA
26 JULY 2010	IMPIANA CASUARINA HOTEL, IPOH
9 AUGUST 2010	MUTIARA HOTEL, JOHOR BAHRU
4 OCTOBER 2010	GURNEY HOTEL, PENANG
TIME	9.00 AM TO 5.00 PM

PROGRAMME OUTLINE

- Introduction to OECD/UN Model Convention
- OECD/UN Commentaries – Legally binding?
- Scope of Convention
- Residence
- Permanent Establishment
 - Mitigation of PE risks
- Business Profits
- Dividends, Interest & Royalties
- Other Income
- Mutual Agreement Procedure and Exchange of Information
- Interaction between tax treaties and domestic law
 - Section 109B, Section 107A, Technical Fee Article and Business Profit Article
 - Section 109F and Other Income Article
- Special issues:
 - Germany-Malaysian DTA
 - Australia – Malaysian DTA
 - Payment for software

SPEAKER

Tan Hooi Beng is a tax consultant and has over 11 years of experience in corporate and international tax. Hooi Beng has substantial experience in advising multinational corporations on corporate structuring and restructuring, mergers and acquisitions, hybrid instruments, use of double-tax treaties, and international tax generally. He is particularly knowledgeable on permanent establishment issues. He speaks frequently on corporate tax matters in various forums and conferences and is also a frequent contributor of tax related articles.

Making the Most of Double Tax Agreements

Registration Fees

- | | |
|--|-----------------|
| <input type="checkbox"/> CTIM Member | RM315.00 |
| <input type="checkbox"/> Member's Firm Staff | RM365.00 |
| <input type="checkbox"/> Non-Member | RM415.00 |

Fee is made payable to **CTIM - CPE**. Admission will only be permitted upon receipt of full payment. Registration can be made via fax.

** Certificate of Attendance will be issued upon full attendance and receipt of full payment.*

Enquiries



Contact Ms Latha / Cik Ally
Tel: 03-2162 8989 Ext 108/113 Fax: 03-2162 8990
E-mail: cpd@ctim.org.my



B-13-2, Megan Avenue II,
No 12, Jalan Yap Kwan Seng,
50450 Kuala Lumpur

Please tick the relevant boxes

- | DATE | VENUE |
|---|-------------------------------|
| <input type="checkbox"/> 23 July 2010 | Renaissance Hotel, Malacca |
| <input type="checkbox"/> 26 July 2010 | Impiana Casuarina Hotel, Ipoh |
| <input type="checkbox"/> 9 August 2010 | Mutiara Hotel, Johor Bahru |
| <input type="checkbox"/> 4 October 2010 | Gurney Hotel, Penang |

Delegate Contact Details

Full Name : _____	Company : _____
Membership No : _____	Designation : _____
Postal Address : _____	Tel : _____
_____	Fax : _____
_____	Email : _____
Dietary Requirements (if any) : _____	Mobile : _____

Payment Method

- I / we hereby enclose
- Cash
- Cheque No. _____
- For Amount of RM _____
(Non-refundable) and made payable to ' CTIM-CPE '
- Please invoice
- FOR MEMBERS ONLY :**
DIRECT ACCESS - CTIM credit card
- RM _____
(Non-refundable)
- * Kindly take note that the Institute accepts **only**
Direct Access - CTIM credit cards

Card Type

- Direct Access - CTIM Visa Card
- Direct Access - CTIM Master Card (tick as appropriate)
- Card No _____ Expiry Date _____
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- Cardholder's Name (as appeared on credit card)

- _____
- Cardholder's Signature _____ Date _____
(signature must correspond with the specimen signature on card)

Replacements

Please note registrations for the event are not interchangeable but replacements are acceptable. Please notify us at least two days prior if you intend to send a replacement. CPD points will be allocated to the designated attendee. If the replacement is not a Member but a Member's Firm Staff or Non-Member, the appropriate fees will apply.

Cancellations

The Chartered Tax Institute of Malaysia must receive cancellations in writing five working days prior to the event. No refund will be given for cancellations received within less than five working days of the event.

Disclaimer

The Organiser reserves the right to change the speaker, date, venue or to cancel the event if the number of participants is less than 15. A minimum of 3 days notice will be given.

Membership and Education Programme Promotion

- I am interested in becoming a Member of Chartered Tax Institute of Malaysia, please send me further details
- I am interested in learning more about the Chartered Tax Institute of Malaysia's Education / Examination Programme, please contact me.