

Workshop:

Minimising Withholding Tax Exposure & Effectiveness of Double Taxation Agreements in Cross Border Transactions

Date: 22 March 2012 | Venue: Seri Pacific Hotel, Kuala Lumpur

Event Code: WS/025 | Time: 9.00am - 5.00pm

Course Objective

Companies involved in cross border transactions tend to overlook the area on withholding tax. The responsibility and accountability for withholding tax deduction rest with the persons making payments to non-residents. This event aims to share the implications arising on payments subject to withholding tax and how to mitigate them besides being tax compliant. The effectiveness of using double taxation agreement (DTA)s in cross border assignments and its implication of withholding tax, corporate tax and individual tax obligations are also shared in this event.

Course Content

- 1. What is withholding tax?
- 2. Incomes derived by non-residents that are subject to withholding tax
- 3. Service fee vs contract payments
- Public Rulings (PR) and addendums on withholding taxes
 - PR 1/2010 on withholding tax on income under paragraph 4(f) income
 - Addendum 4/2005 (Addendum 2) on Special Classes f Income
- 5. Tax planning and exemptions available on withholding tax
- 6. Compliance issues and penalties
- 7. Practical issues faced by taxpayers
- 8. Inbound and Outbound investments
- 9. What is a DTA?
- 10. Concept of permanent establishmentcorporate and individual tax issues
- 11. Purposes of other relevant articles in DTAs
- 12. Business income vs non-business income
- 13. Reliefs available under DTAs
- 14. Case laws and latest developments on withholding tax and updates on existing and new DTAs (including proposals in Budget 2012)

Speaker

Sivaram Nagappan currently heads the tax department in one of the public listed Malaysian companies in Malaysia and is an Associate Member of CTIM, a Fellow Member of ACCA and a Chartered Accountant of MIA. He has more than 19 years of tax experience and prior to leaving the tax practice, he served with PricewaterhouseCoopers, Arthur Andersen and Ernst & Young where he gained extensive experience from servicing clients which included large local corporations and multinationals in a wide spectrum of industries covering manufacturing, transportation, services, construction, telecommunications and trading. His involvement in tax engagements with local and foreign companies encompassed various aspects of tax planning strategies/schemes, restructuring of companies, mergers and acquisitions, cross border transactions, repatriation of profits, investment incentives, remuneration packages, tax audit and tax investigation. He has presented at seminars, workshops and conducted trainings for regulatory bodies and organisations both locally and overseas. His passion for knowledge sharing also extends to conducting lectures in taxation papers for professional examinations in various colleges, institutes and local universities.

Who Should Attend

- Finance Directors
- Finance Managers
- Chief Financial Controllers
- Accountants
- Financial Controllers
- Auditors
- Tax Managers
- Company Secretary
- Tax Consultants
- Business Advisors









Registration Form

Please retain original copy for your records. | Please photocopy for additional delegates. | Registration can be made via fax.

Minimising Withholding Tax Exposure & Effectiveness of Double Taxation **Agreements in Cross Border Transactions**

Registration Fees

Klang Valley

CTIM Member

□ RM350.00

Member's Firm Staff

□ RM400.00

Non-Member

□ RM460.00

Seats are limited based on first-come, first-served basis.

- * Registration of participants will be confirmed upon receipt of full payment or an acceptable employers guarantee and settlement of previous outstanding dues.
- * Walk-in participant registration is subject to availability of seats and full payment.
- * Certificate of Attendance will be issued upon full attendance and receipt of full

Enquiries



Contact Cik Yus / Encik Ridzuan / Cik Fadeah Tel: 03-2162 8989 Ext 121/108/113 Fax: 03-2161 3207 / 03-2162 8990

E-mail: cpd@ctim.org.my



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Delegate Contact Details	
Full Name :	Company :
Membership No :	Designation :
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	Fax:
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Payment Method	
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Replacements
Please note registrations for the event are not interchangeable but replacements are acceptable. Please note 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.

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 rece within less than five working days of the event.

Confirmation of Registration
The confirmation letter will be issued 5 days before the commencement of the event. In the event you do not receive the confirmation letter 5 days before the event, please contact us immediately

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 detail
- I am interested in learning more about the Chartered Tax Institute of Malaysia's Education / Examination Program please contact me.