

# NEW TRANSFER PRICING & ADVANCE PRICING ARRANGEMENT (APA) RULES:

## *An In-depth Understanding Of The Rules*

**Date: 6 November 2012 (Tuesday) | Venue: Hotel Istana, Kuala Lumpur | Time: 9.00am to 5.00pm | Event Code: SE/002**

### INTRODUCTION

CTIM is organising a one-day seminar on 6 November 2012 to provide an in-depth understanding of the rules and guidelines of the newly introduced Transfer Pricing and APA Rules in Malaysia. By attending the seminar, you can get expert advice and insight from leading transfer pricing experts.

Learn about the developments and latest information on the new Transfer Pricing and APA Rules!

### Programme Outline

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|----------|---|
| 8.00 am  | Registration & Welcome Coffee/Tea   |
| 9.00 am  | Transfer Pricing Rules & New Guidelines<br>- clarifications & in-depth understanding of the rules & guidelines<br><i>Speaker:</i><br>Mr SM Thanneermalai<br><i>President, Chartered Tax Institute of Malaysia</i>   |
| 10.45 am | Question & Answer Session   |
| 11.00 am | Morning Refreshments  |
| 11.30 am | Preparing Transfer Pricing Documentations that meets the IRB's requirements<br><i>Speaker:</i><br>Mr Vinay P. Nichani<br><i>Director, Ernst &amp; Young Tax Consultants Sdn Bhd</i>   |
| 12.30 pm | Question & Answer Session   |
| 12.45 pm | Networking Lunch  |
| 2.00 pm  | Advance Pricing Arrangement (APA)<br>- APA & its relevance in today's context<br>- Navigating through the application and filing process<br><i>Speaker:</i><br>Theresa Goh<br><i>Tax Partner and National TP Leader,<br/>Deloitte KassimChan Tax Services Sdn Bhd</i> |
| 3.15 pm  | Question & Answer Session   |
| 3.30 pm  | Panel Discussion Session<br><i>Panel Members:</i><br>All of the above speakers  |
| 4.30 pm  | End of Seminar & Refreshments   |

### PROFILES

#### SM THANNEERMALAI

*President, Chartered Tax Institute of Malaysia*

SM Thanneermalai is a Senior Executive Director with PwC Taxation Services Sdn Bhd where he heads the Transfer Pricing, Audit and Investigation practice as well as India Desk unit. He specialises in assisting multinational companies and local conglomerates with corporate tax matters, transfer pricing, tax audits and investigations. He has significant experience in transfer pricing and its includes advising taxpayers on a whole range of transfer pricing matters. He frequently represents taxpayers before the Malaysian Inland Revenue Board with respect to tax audits, tax investigations and transfer pricing audits. He has been practising tax for more than 30 years. He works very closely with a range of regulatory authorities, namely, Ministry of Finance (MOF) and other Government agencies to contribute towards the development of taxation policies and legislation. He regularly contributes to the local professional journals and speaks frequently at seminars and conferences both locally and overseas.

#### VINAY P. NICHANI

*Director, Ernst & Young Tax Consultants Sdn Bhd*

Vinay is a Director in Ernst & Young Malaysia's transfer pricing practice and has more than 11 years of experience working as a transfer pricing consultant in India. Vinay's transfer pricing experience include leading engagement teams for the preparation of transfer pricing documentation for a wide range of transactions including oil & gas, software services, back office support services, sale and purchase of goods, intangible transactions such as royalty and technical fees; and the provision of management services. In addition, Vinay is involved in assisting clients in dealing with transfer pricing audits and investigation cases with the Tax Authorities. His experience includes the preparation of defense strategies and submission of detailed technical appeals to substantiate his clients' transfer pricing positions. Vinay has also been on an overseas secondment to the United States for 2 years between 2005 to 2007, where he worked with key Global clients on their transfer pricing policy, restructuring and compliance. He has also worked on global transfer pricing compliance and IP migration projects for large MNC's in the United States. Vinay has been a regular speaker on transfer pricing at conferences in India and Malaysia.

#### THERESA GOH

*Tax Partner and National TP Leader, Deloitte KassimChan Tax Services Sdn Bhd*

As head of Deloitte Malaysia's National Transfer Pricing Team, Theresa Goh led the team to win the Malaysia Transfer Pricing Firm of the Year Award provided by ITR in 2008. Based in Kuala Lumpur, her experience covers a wide repertoire of tax advisory services, particularly Transfer Pricing, and corporate tax as well as tax audits and investigations, tax planning and advisory for clients in a wide range of industries, including manufacturing, services and oil & gas sectors. Theresa has more than 25 years of tax and transfer pricing experience covering a wide range of taxation. She has extensive experience in successfully completing many tax planning and consulting assignments in areas such as restructuring, mergers and acquisition. She has performed TP studies for clients in numerous industries and provided assistance to clients in developing strategies for the application for APA's as well as transfer pricing audit defence.

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