

2012 Top Controversial Tax Issues

Date: 22 January 2013 Venue: Hotel Istana, Kuala Lumpur

Event Code: WS/020 Time: 9.00am - 5.00pm

Speaker Profile

Tan Hooi Beng is currently an Executive Director of BDO Tax Services Sdn Bhd. He is an associate member of the Chartered Tax Institute of Malaysia and a Chartered Accountant of the Malaysian Institute of Accountants. He holds a Bachelor of Accounting from the University of Malaysia. Hooi Beng has more than 13 years of experience in corporate and international tax.

He has vast experience in advising multinational corporations on corporate structuring and restructuring, mergers and acquisitions, tax-efficient financing, international offshore financial centres, tax-aligned supply chain, tax treaties and cross-border taxation generally. Prior to this, Hooi Beng was attached to two of the Big Four accounting firms. He last served as an executive director and international tax leader in one of the firms.



Course Contents

- Can treaty override withholding tax under Section 109B in the absence of Article on Technical Fee?
- Withholding tax on payment for software:
 An ongoing saga
- Gearing up for thin capitalization: Any planning opportunity?
- Locality of profits Malaysian source v local source: Must an income suffer foreign tax to qualify as foreign source income?
- Threshold test for 2012 transfer pricing guidelines: How to determine arm's length price without a robust transfer pricing documentation?
- Interest-free loan/borrowing arrangement







Registration Form

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

2012 TOP CONTROVERSIAL TAX ISSUES

Registration Fees CTIM/ACCA Member	 * Registration of participants will be confirmed upon receipt of full payment of 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 payment. 	ng
Enquiries Contact Ms Yus / Mr Jason / Ms Fadeah / Ms Ally Tel: 03-2162 8989 Ext 121/108/113/123 Fax: 03-2161 3207 / 03-2162 8990 E-mail: cpd@ctim.org.my	B-13-2, Block B, Level 13, Unit 2, Megan Avenue II, No 12, Jalan Yap Kwan Seng, 50450 Kuala Lumpur	_
Participant's Contact Details Full Name :	Company :	_
CTIM/ACCA Membership No :		
Postal Address :		
	Fave	
	Email :	
Dietary Requirements (if any) :	Mobile :	_
Payment Method I / we hereby enclose Cash for Amount of RM Cheque No. For Amount of RM (Non-refundable) and made payable to CTIM-CPE Please debit my Direct Access-CTIM Master Card for amount of RM Direct Access-CTIM Visa Card for amount of RM	Cardholder's Name (as appeared on credit card) Cardholder's Signature Cardholder's Signature (signature must correspond with the specimen signature on card)	
Master Card / Visa Card	_	

for amount of RM _

Please note registrations for the event are not interchangeable but replacements are acceptable. Please notify us at least three days prior to the event 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.

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 20. 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.