

Making the Most of DOUBLE TAX AGREEMENT

Date : 19 December 2013
Venue : CTIM Training Room, Kuala Lumpur
Event Code : WS/090
Time : 9.00am to 5.00pm

COURSE 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'S PROFILE

Tan Hooi Beng is the Executive Director as well as the Business Model Optimization Tax Leader of Deloitte Malaysia. He is based in Kuala Lumpur and has more than 14 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, business model optimization, tax treaties and cross-border taxation generally.

He is an associate member of the Chartered Tax Institute of Malaysia, a Chartered Accountant of the Malaysian Institute of Accountants as well as a licensed tax agent under the Malaysian Income Tax Act, 1967. He holds a Bachelor of Accounting from the University of Malaysia.



**Subsidised fee
is available to
CTIM members only**

REGISTRATION FEES

CTIM Member Subsidised Fee*	<input type="checkbox"/>	RM150.00
CTIM/ACCA Member	<input type="checkbox"/>	RM300.00
Member's Firm Staff	<input type="checkbox"/>	RM350.00
Non-Member	<input type="checkbox"/>	RM400.00

* CTIM Members who are from small and medium firms are eligible for this subsidised fee.

Replacements

Please note registrations for the event are not interchangeable but replacements are acceptable. Please notify us at least five 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.

REGISTRATION FORM

Full Name _____

I/C Number _____

CTIM/ACCA Membership No _____

Designation _____

Organisation _____

Address _____

Tel _____ Fax _____

E-mail _____

Dietary Requirements (if any) _____

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
 Visa Card
for amount of RM _____

Master Card
for amount of RM _____

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)

- * *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 payment.*

ENQUIRIES

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Email: cpd@ctim.org.my

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Contact Person:

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Ms Ally (ext 123 / ally@ctim.org.my)
Ms Nur (ext 106 / nur@ctim.org.my)

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.

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 20. A minimum of 5 days notice will be given.