

PRACTICAL ASPECTS OF TRANSFER PRICING DOCUMENTATION

Date: 26 September 2018
Venue: Renaissance Hotel, Kuala Lumpur
Event Code: 18WS/038
Time: 9.00am – 5.00pm

Introduction

The Malaysian Inland Revenue Board updated the Malaysian Transfer Pricing Guidelines on 15 July 2017. The updates were in line with OECD's BEPS Action 8–10 (Aligning transfer pricing outcomes with value creation) and BEPS Action 13 (Transfer pricing documentation and country-by-country reporting). The updates to the Guidelines focuses mainly on:

- Substance-focused arm's-length principle
- Broader definition of intangibles
- Introduction to the Development, Enhancement, Maintenance, Protection and Exploitation (DEMPE) concept
- Guidance to support pricing of intercompany commodity transactions
- Additional requirements for updating transfer pricing documentation policies

Programme Outline

- Introduction: Transfer Pricing Scene in Malaysia
 - Overview of the tax/transfer pricing scene in Malaysia post GE14
 - Issues faced by taxpayers
 - IRB's main focus
- Recent Changes to Malaysian Transfer Pricing Guidelines
 - Arm's Length Principle
 - Aligning the returns to value creation
 - Risk analysis
 - Dealing with intangibles (e.g: Royalty, Licensing, etc)
- Building Blocks of Documentation
 - Organisational chart
 - Overview of group
 - Overview of local entity
 - Industry analysis
 - Description of controlled transactions
 - Analysis of pricing policies
 - Comparability analysis
 - Functional analysis
 - Risk analysis
 - Financial analysis
 - Selection of transfer pricing method
 - Application of transfer pricing method
- Special Issues in Transfer Pricing
 - Price allocation for intragroup services
 - Analysis and pricing policy of intangibles
 - Issues related to intragroup financing - Interest free loans
- Q&A Session

Speaker's Profile

SM Thanneermalai is currently the Managing Director of Thannees Tax Consulting Services Sdn Bhd. He was previously a Partner of PriceWaterhouseCoopers until June 2015, and between July 2015 to December 2017 he was the Managing Director of Crowe Horwath KL Tax Sdn Bhd. He is also currently the Chairman of the Board of Trustees of the Malaysian Tax Research Foundation. He is also the former president of the Chartered Tax Institute of Malaysia (CTIM), and a member of the Chartered Accountants of England and Wales (ICAEW) and the Malaysia Institute of Accountants (MIA). SM Thanneermalai has extensive experience in handling a vast variety of transfer pricing and corporate tax assignments. He specialises in assisting multinational companies and local conglomerates with international tax planning, transfer pricing, tax audits, investigations, corporate tax matters and generally on all aspects of tax laws including GST matters. He has been working in the field of taxation since 1980. He works very closely with the Inland Revenue Board of Malaysia, Royal Malaysia Customs Department, the Tax Policy Division of the Ministry of Finance, MIDA, MDEC and etc.

Objectives

This programme seeks to provide you with:

- Ability to prepare your own transfer pricing documentation, with knowledge and guidance supported by a detailed walk-through of the various requirements with practical examples
- Practical insights in preparing transfer pricing documentation
- An overview of the transfer pricing principles and the latest requirements of the IRB
- Examples of common mistakes which should be avoided

Who Should Attend

- CEOs, COOs, CFOs
- Directors/General Managers
- Entrepreneurs
- Financial Controllers
- Finance Directors/Managers
- Tax Managers/Professionals

Methodology

Lectures accompanied with practical examples and sharing of the speaker's past experience.

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*Registration Fees


- CTIM/ACCA Member
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Klang Valley
 RM400.00
 RM500.00
 RM600.00

- * Seats are limited and based on first-come, first-served basis
- * Registration of participants will be confirmed upon registration, receipt of full payment or an acceptable employers guarantee and settlement of previous outstanding dues.
- * All outstanding payment must be received on or prior to the date of the event for participants to be allowed to attend. The institute reserves the right to cancel the registration if no payment is received prior to or on the date of the event.
- * Walk-in participant registration and attendance is subject to availability of seats and full payment.
- * Certificate of attendance will only be released upon participant signing the attendance register before 10.30am, full attendance and after completion of the event.

Enquiries

 Tel: 03-2162 8989
 Fax: 03-2161 3207
 03-2162 8990
 Email: cpd@ctim.org.my

 B-13-1, Block B, Level 13, Unit 1,
 Megan Avenue II,
 No 12, Jalan Yap Kwan Seng,
 50450 Kuala Lumpur

Contact Person:

For Klang Valley events:
 Ms Yus (ext 121 / yusfariza@ctim.org.my)
 Mr Jason (ext 108/ jason@ctim.org.my)
 Ms Maryam (ext 107/ maryam@ctim.org.my)
 For Outstation events:
 Ms Jaslina (ext 131/ jaslina@ctim.org.my)
 Ms Zaimah (ext 119/ zaimah@ctim.org.my)
 General enquiries:
 Ms Ally (ext 123 / ally@ctim.org.my)

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Vegetarian

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Replacements

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Cancellations

The Chartered Tax Institute of Malaysia must receive cancellations in writing five working days prior to the event. Refund amount is subject to deduction of administration and finance charges. 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 emailed 5 days before the commencement of the event upon receipt of full payment. 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 3 days notice will be given.

Recording

Video / Sound recording is strictly prohibited.