

TRANSFER PRICING SEMINAR 2020

Managing Transfer Pricing Issues

21 January 2020, Tuesday 

9.00am - 5.15pm 

Sime Darby Convention Centre, Kuala Lumpur 

TIME

PROGRAMME

8:30am Registration & Welcome Coffee/Tea

9:00am **Earning Stripping Rules (ESR) - Making Sense of the ESR & Guidelines**

Moderator:

Mr Chow Chee Yen
CTIM Deputy President

Speaker:

Mr Shaharrudy b. Othman (invited)
Director, Department of International Taxation
Inland Revenue Board of Malaysia

10:00am Morning Refreshments

10:30am **TP Dispute Resolution: Appeals, MAP & APA**

Moderator:

Ms Theresa Goh
Executive Director, National Transfer Pricing Leader
Deloitte Touche Tohmatsu Tax Services Sdn Bhd

Panelists:

- **Ms Kok Choy Har (invited)**
Director, Mutual Agreement Procedure & Transfer Pricing Policy Division,
Department of International Taxation
Inland Revenue Board of Malaysia
- **Ms Anushia Soosipillai**
Partner, Tax - Transfer Pricing
PricewaterhouseCoopers Taxation Services Sdn Bhd
- **Industry Representation**

12:00pm **Transfer Pricing Cases - What's New?**

Moderator:

Mr Alan Chung
CTIM Council Member

Speaker:

Ms Adeline Wong
Managing Partner
Wong & Partners

1:00pm Networking Lunch

TIME

PROGRAMME

2:00pm **Transfer Pricing from a SME's Perspective: Documentation & Practical Issues**

Moderator:

Mr Thenesh Kannaa
CTIM Council Member

Panelists:

- **Mr Bob Kee**
Executive Director, Tax - Transfer Pricing
KPMG Tax Services Sdn Bhd
- **Mr Foo Meng Hwei**
Executive Director, Tax
Crowe KL Tax Sdn Bhd
- **Mr Christopher Low**
Executive Director, Tax
BDO Malaysia

3:15pm **Managing Financial Assistance Transactions with Related Parties**

Moderator:

Ms Leow Mui Lee
CTIM Council Member

Speaker:

Mr Hisham b. Rusli (invited)
Director, Multinational Tax Branch
Inland Revenue Board of Malaysia

4:15pm **Intangible Property: Valuation, Disposal & Arm's Length Remuneration**

Moderator:

Mr SM Thanneermalai
Managing Director
Thannees Tax Consulting Services Sdn Bhd

Panelists:

- **Mr Sockalingam Murugesan**
Partner - ASEAN Transfer Pricing Leader
Ernst & Young Tax Consultants Sdn Bhd
- **Mr Subhabrata Dasgupta**
Partner, Transfer Pricing
Deloitte Tax Services Sdn Bhd

5:15pm End of Conference & Refreshments

PROFILES



ADELINE WONG

Adeline Wong is a Managing Partner of Wong & Partners. Adeline has more than 25 years of experience spanning a broad category of tax work which encompasses corporate tax planning and advisory, tax audits, tax controversies, foreign trade and WTO matters, transfer pricing, and wealth and trust management. She is a frequent speaker at industry conferences in Malaysia and abroad, speaking to clients and business associates alike on the developments and updates on tax legislation, law and policy in the Malaysian tax regime.



ALAN CHUNG

Alan Chung is currently the Senior Executive Director of Grant Thornton Malaysia. He has more than 20 years of experience in assisting and advising companies in various transfer pricing projects and defending challenges to transfer prices by tax authorities in tax audits and investigation. She is a member of the CTIM and a Fellow of CPA Australia. Anushia is a Board of Governor for American Malaysia Chamber of Commerce. She has experience in advising clients on transfer pricing projects such as price setting assignments, risk management reviews, preparing and submitting transfer pricing report to tax authorities, shared cost allocation and comparable studies. Anushia also works very closely with other tax and transfer pricing specialists within the PricewaterhouseCoopers network for assignments that involves clients with overseas and Malaysian operations.



ANUSHIA SOOSAIPILLA

Bob currently co-lead KPMG's transfer pricing practice in Malaysia. Bob advises on various transfer pricing issues, including compliance to BEPS reporting requirements in Malaysia. He helps his clients formulate defense strategies for tax audit situations and planning for transfer pricing risk mitigation. He is also extensively involved in providing transfer pricing services in relation to the supply chain restructuring of companies operating in the agricultural, consumer products, electronics, textile, pharmaceutical and oil & gas industries. In 2011, Bob earned the distinction of being an expert witness in Malaysia's first transfer pricing court case (which was decided in favour of his client). More recently, in the 2019 edition of the Guide to the World'...



BOB KEE

Chow Chee Yen is currently the Senior Executive Director of Grant Thornton Malaysia. He has more than 28 years of tax experience and was involved in tax engagements concerning cross border transactions, tax due diligence review, restructuring schemes, corporate tax planning, group tax review, inbound investments and goods and services tax (GST). Chee Yen's expertise is in high demand and he is a prolific trainer/facilitator for tax workshops and seminars organised by CTIM, ACCA, CCH, CPA Australia, MIA, MAICSA, MICPA and the STAR newspaper. In addition, he conducts in-house training for both professional firms and corporations as well as guest speaker for national and international conferences. He is a Deputy President of the CTIM, a Fellow Member of ACCA and a Chartered Accountant of the MIA. He is also a graduate of the MICPA Examination.



CHOW CHEE YEN

Christopher Low has over 30 years' experience in tax compliance and tax advisory assignment. Prior to joining BDO, he was an Executive Director in the Transfer Pricing and Investigation unit of PricewaterhouseCoopers. His clientele includes financial institutions, construction and property development, plantation, retail and groups of companies. Since 1997 he has been extensively involved in providing advice and representing taxpayers in the area of Tax Audits and Tax Investigation including TP matters, having assisted and resolved numerous cases between taxpayers and the Malaysian Inland Revenue Board (IRB). In addition to his work experience, he has been involved in public speaking engagements such as at the National Tax Conference, CTIM and IRB joint seminars as well as in-house seminars related to Tax Audits and Tax Investigations. Currently Chris is a member of the CTIM CPD working group.



CHRISTOPHER LOW

Meng Huei is an Executive Director of Crowe KL Tax Sdn Bhd. He leads the Transfer Pricing practice of Crowe Malaysia and handles transfer pricing assignments for both domestic groups of companies and multinational corporations. Having been in practice since 1998, Meng Huei has vast experience in advising clients on corporate tax, tax incentives, international tax, tax audit and investigation, and tax advisory on business restructuring and corporate exercises. His clients include a wide range of private, public listed and multinational companies engaged in a variety of industries.



FOO MENG HUEI

Hisham is a Director of the Multinational Tax Branch at the Inland Revenue Board of Malaysia. He started his career with IRBM in 1998 and has served at the Shah Alam branch, Johor Bahru branch, and the Tax Compliance department, holding responsibilities that cover auditing of MNEs, Advance Pricing Arrangement (APA), and as a Technical Committee member in the Mutual Agreement Procedure (MAP). He had also served as a Director with the Keningau (Sabah) and Melaka Branches, and as Deputy Director of the Large Taxpayer Branch (LTB).



HISHAM RUSLI

Kok is a Director for Mutual Agreement Procedure and Transfer Pricing Policy Division, Department of International Taxation, Inland Revenue Board of Malaysia. She has served in various departments and branches in IRBM before joining the Transfer Pricing unit in late 2007. Since then, she has conducted transfer pricing training and workshops for IRBM staff and attended WP6 meeting at OECD. She has been appointed as a speaker/panellist at the following events such as the Japan International Cooperation Agency, TP Presentation at Ministry of Finance, TP Presentation at Ministry of Domestic Trades, Cooperatives and Consumerism, 'The BEPS Actions Plan, International Practices and Vietnam's Perspective' a convention organised by World Bank and Vietnam GDT, BEPS Breakfast Talk organised by PwC Malaysia and TP Minds Asia, Singapore – TP Landscape.



KOK CHOY HAR

Leow Mui Lee is the Managing Director of Axcelasia Taxand Sdn Bhd. She has many years of tax experience with leading international accounting firms in Malaysia. She leads Taxand's transfer pricing service line and has serviced a broad spectrum of clients including large multinational corporations and public listed companies. She is a Council Member of CTIM and Chairman of CTIM's Technical Committee Transfer Pricing.



LEOW MUI LEE

Thanneermalai is the Managing Director of Thannees Tax Consulting Services Sdn Bhd, with extensive experience in transfer pricing and corporate tax. He is specialises in international tax planning, tax audits, corporate tax, transfer pricing, intra group transaction, developing pricing policies and representation before IRB of Malaysia. He also works closely with regulatory authorities on government policies and legislation. He is a member of ICAEW and MIA, Member and Past President of CTIM and a Trustee member of Malaysia Tax Research Foundation.



SM THANNERMALAI

Sockalingam is a Leader and Partner in Ernst & Young Malaysia's transfer pricing practice. He has more than 20 years of professional experience in tax consultancy, including more than 12 years in transfer pricing. His transfer pricing experience include leading engagement teams for the preparation of transfer pricing documentation for a wide range of transactions including sale and purchase of goods, intangible transactions such as royalty and technical fees; and the provision of management services. He has also been involved in the design and implementation of tax effective supply chains for clients carrying out extensive cross border transactions. In addition, Sockalingam is extensively involved in assisting clients in dealing with transfer pricing audits and investigation cases with the Inland Revenue Board. Sockalingam has also experience in dealing on Mutual Agreement Procedures (MAPs) applications involving the Government of Malaysia and Japan.



SOCKALINGAM MURUGESAN

Subho is a partner in the transfer pricing service line of Deloitte Malaysia. He has extensive experience in working with Deloitte network offices in Asia, the EMEA and the Americas on global and regional transfer pricing documentation and planning engagements involving policy design, implementation, delivery and follow-up/monitoring elements, for U.S., EU and Asian clientele. He handles a portfolio of both foreign and local multinational and domestic groups. Subho has more than 12 years' experience in serving clients from varied industries: electronics and electrical, pharmaceuticals, real estate & construction, consumer and industrial products, financial services, telecommunications, oil & gas, primary and secondary metal manufacturing, agri-business, and aerospace and defence, among others. His assignments have involved global/local documentation, supply chain restructuring and due diligence projects, audit defence, APA, Action 13 TPD and CbCR, etc. Currently, he is leading the TP Technology and FSI offerings from Deloitte in Malaysia.



SUBHABRATA DASGUPTA

Theresa is a Partner of Transfer Pricing at Deloitte Tax Services Sdn Bhd, with over 30 years' experience as a tax professional encompassing transfer pricing, tax audits, investigations, tax advisory work, supply chain management and business model optimisation projects. She is a frequent speaker at conferences, nationally and abroad, focussing on emerging transfer pricing and tax issues. She is a certified public accountant (Malaysia), a chartered accountant, and is a council member of Malaysian Institute of Certified Public Accountants and a member of the Chartered Tax Institute of Malaysia. She is also an approved tax agent under the Malaysian Income Tax Act, 1967.



THERESA GOH

Thenesh is a partner at TraTax, a firm of independent tax advisors rated as Top 10 in Malaysia for Transactional Tax and shortlisted by ITR Asia Awards for the Best Newcomer in Asia Award 2018 for International Tax. Thenesh advises on both international tax and indirect tax matters to clients from diverse industries including manufacturing, professional services, distribution, retail, construction, property development, healthcare, financial services, shipping, telecommunications, societies, GLCs and statutory bodies. Thenesh is a Council Member of CTIM and is a member of Institute's various technical committees. He has also authored various books and articles on taxation.



THENESH KANNA

Registration Form

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

TRANSFER PRICING SEMINAR 2020

Registration Fees


- | | |
|----------------------------------------------|----------|
| <input type="checkbox"/> CTIM/ACCA Member | RM477.00 |
| <input type="checkbox"/> Member's Firm Staff | RM583.00 |
| <input type="checkbox"/> Non-Member | RM689.00 |

*The above registration fees are inclusive of 6% Service Tax effective from 1 March 2019.

- * 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

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General enquiries:

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

Participant's Contact Details

Full Name : _____

Company : _____

I/C Number : _____

Designation : _____

Membership No : CTIM _____

Tel : _____

ACCA _____

Fax : _____

Member's Firm Staff _____

Email : _____

Company Address : _____

Mobile : _____

Vegetarian

Payment Method

Online Payment via JomPAY

MASTER / VISA Credit Card

For amount of RM _____



Biller Code: 21790
 Ref-1: Event Code
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*All cheque should be made payable to "CTIM-CPE"

Replacements

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. 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.