

# Core Requisites of Preparing Transfer Pricing Documentation

Date : 29 April 2020, Wednesday

Venue : Berjaya Times Square Hotel, Kuala Lumpur

Time : 9:00 am – 5:00 pm

Event Code : 20WS/029

# This programme seeks to provide you with:

- Understanding of the basic principles behind transfer pricing
- Understanding the requirements in preparing TP Documentation
- Guidance in applying the comparability analysis
- · Guidance in applying the Transfer Pricing methodologies

# **Programme Outline**

- Introduction: Transfer Pricing Scene in Malaysia
  - Overview of the tax/transfer pricing scene in Malaysia
  - ► Recent developments
  - IRB's main focus
- The arm's length principle
- Transfer Pricing Documentation
  - ► Importance, Purpose and Content
  - Malaysian Documentation requirements
  - ► Guidelines for Submission
- Transfer Pricing Documentation: Application of Comparability analysis
  - Contractual terms of transaction
  - Functional, Assets and Risks analysis which includes financial analysis
  - Characteristics of properties / services
  - Economic circumstances
  - Business strategies
- Transfer Pricing Documentation: Selection of the most appropriate Transfer pricing methodologies
  - Comparable uncontrolled price method
  - Resale price method
  - Cost plus method
  - Profit split method
  - Transactional net margin method
- Q&A Session

# **Speakers' Profile**

Selvi Permal is the Director at Thannees Tax Consulting Services Sdn Bhd and has over 13 years' of working experience in Tax, specializing in Transfer Pricing Advisory. She was with KPMG UK, Pricewaterhouse Coopers Malaysia and Crowe Horwath Malaysia before joining her current role. She has extensive knowledge and exposure in handling highly complex transfer pricing cases which includes preparation of documentation for compliance and audit purposes, setting or resetting of transfer prices, implementation of TP policies, representing clients during dispute, and value chain analysis. Her clientele includes multinationals mainly in Singapore, Indonesia, Cambodia and the UK, as well as large local conglomerates based in Malaysia. Selvi Permal is a member of Chartered Tax Institute of Malaysia.

**Sindu** has been in the taxation field for over 10 years. She began her career in corporate tax where she assisted a portfolio of clients in tax compliance matters, tax audit, transfer pricing matters, tax due diligence, tax advisory, obtaining tax clearance and tax incentive application. Currently, she specializes in transfer pricing and has assisted mainly MNCs and large conglomerates in various countries including Singapore, Indonesia, and Cambodia with their transfer pricing issues. Her specialties in transfer pricing extends to dealing with complex transfer pricing restructuring, price setting exercises, and transfer pricing audits.







# **Registration Form**

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

# **Core Requisites of Preparing Transfer Pricing Documentation**

### **Registration Fees**

- ☐ CTIM/ACCA Member
- ☐ Member's Firm Staff
- ☐ Non-Member
- \*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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#### **Contact Person:**

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Full Name :	Company :
I/C Number :	Designation :
Membership No : CTIM	
ACCA	
☐ Member's Firm Staff	
Company Address :	Mobile :
	☐ Vegetarian
Payment Method  Online Payment via JomPAY  Biller Code: 21790 Ref-1: Event Code Ref-2: Mobile Number  JomPAY online at Internet and Mobile Banking with your Current, Savings or Credit Card account  Cash for Amount of RM	MASTER / VISA Credit Card For amount of RM  Card No  Expiry Date  Authorised Signature
Cheque No For Amount of RM *All cheque should be made payable to "CTIM-CPE"	(month/year)

#### 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.