

# Transfer Pricing: Practical Challenges Faced by the Taxpayers

Date : 8 July 2020, Thursday  
Venue : Berjaya Times Square Hotel, Kuala Lumpur  
Time : 9.00 am – 1.00 pm  
Event Code : 20WS/037

It is inevitable for a multinational or a local group of company to ignore the transfer pricing aspects in their business operation. However, do the companies fulfil their local transfer pricing compliance requirements in the countries they operate? Do the companies have sufficient time or documents to support the inter-company arrangement in the event of an audit? This workshop seeks to highlight the practical challenges faced by the taxpayers when it comes to transfer pricing compliance and in the event of an audit.

## Objectives:

- ▶ Understanding the transfer pricing requirements in Malaysia
- ▶ The practical challenges when preparing TP Documentation
- ▶ The challenges to maintain proper evidence to support the transfer prices
- ▶ Measures to minimise the challenges

## Course Outlines:

### A. Introduction

- Overview of the tax/transfer pricing scene in Malaysia
- IRB's current focus

### B. Transfer Pricing requirements in Malaysia

- Transfer Pricing Guidelines
- TP Rules

### C. What are the practical challenges faced by the Taxpayers?

#### i. Documentation

- Information to be recorded in the documentation
- Prepare locally or use global / group TP document
- The extent of the details

#### ii. Comparability analysis

- 5 Factors to consider
- Obtaining relevant information for functions, assets and risk analysis
- Comparability adjustments

#### iii. Selection and application of the appropriate transfer pricing methodologies

- Reasons for eliminating other methods
- Selection of tested party

#### iv. External Benchmarking Study

- Search criteria to be used
- Years of comparison
- Lack of latest financial data

### D. Q&A session

## Speakers' Profile:

**Selvi Permal** has over 14 years of working experience in Tax, specialising in Transfer Pricing Compliance and Advisory. She was attached with KPMG UK, PwC Malaysia and Crowe Malaysia before joining her current role in RSM Malaysia. She has extensive knowledge and exposure in handling highly complex transfer pricing cases which includes handling transfer pricing audits, representing clients during audit/dispute, preparation of transfer pricing documentation for compliance and audit purposes, developing transfer pricing policies/model, transfer pricing planning/ advisory, implementation of transfer pricing policies and value chain analysis. She is also a frequent presenter at local Transfer Pricing seminars and events. Her clientele includes multinational companies from various industry, large local conglomerates as well as government-linked companies.

## Registration Form

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

### Transfer Pricing: Practical Challenges Faced by the Taxpayers



#### Registration Fees


- |  |          |
|--|----------|
| <input type="checkbox"/> CTIM/ACCA Member    | RM318.00 |
| <input type="checkbox"/> Member's Firm Staff | RM371.00 |
| <input type="checkbox"/> Non-Member          | RM424.00 |

\*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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 Fax: 03-2162 8990  
 03-2161 3207  
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 Ms Jaslina (ext 131 / jaslina@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



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

- MASTER / VISA Credit Card

For amount of RM \_\_\_\_\_

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Expiry Date

Authorised Signature

- Cash for Amount of RM \_\_\_\_\_

(month/year)

- Cheque No. \_\_\_\_\_

For Amount of RM \_\_\_\_\_

Cardholder's Name ( as per credit card )

\*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.