

Managing Transfer Pricing in Times of Uncertainties

Date : 27 April 2021, Tuesday
Time : 9:00AM – 5:00PM
Event Code : 21SE/002

Registration Fees

CTIM/ACCA Member	RM371.00
Member's Firm Staff	RM424.00
Non-Member	RM477.00

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

TIME	PROGRAMME	TIME	PROGRAMME
8.30 am	Registration and Log-in	12.45 pm	Q & A Session
9.00 am	Session 1: Forum Discussion: Managing Transfer Pricing in Times of Uncertainty <u>Moderator:</u> Ms Theresa Goh <i>Senior Partner, Deloitte Malaysia</i> <u>Panel Members:</u> Mr Hisham Rusli <i>Director, Multinational Tax Branch, Inland Revenue Board of Malaysia</i> Ms Bernice Tan <i>Executive Director, Transfer Pricing, BDO Malaysia</i> Ms Kalsumawati binti Mohd Aris <i>Cluster Tax Lead Malaysia, Indonesia, Vietnam and Japan, Shell Malaysia Limited</i>	1.00 pm	Lunch Break
10.15 am	Q & A Session	2.00 pm	Session 4: Tax Cases on Transfer Pricing <u>Chairman:</u> Mr Thenesh Kannaa <i>CTIM Council Member</i> <u>Speaker:</u> Ms Krystal Ng <i>Partner, Wong & Partners</i>
10.30 am	Morning Break	2.45 pm	Q & A Session
10.45 am	Session 2: Legislative Changes to Transfer Pricing <u>Chairman:</u> Ms Leow Mui Lee <i>CTIM Council Member</i> <u>Speaker:</u> Dr. Esther A.P. Koisin <i>Director, Department of International Taxation, Inland Revenue Board of Malaysia</i>	3.00 pm	Session 5: Intricacies of Managing Intra-Group Services from a Transfer Pricing Perspective <u>Chairman:</u> Mr Foo Meng Huei <i>Executive Director, Tax, Crowe KL Tax Sdn Bhd</i> <u>Speaker:</u> Mr Bob Kee <i>Executive Director, Tax - Transfer Pricing, KPMG Tax Services Sdn Bhd</i>
11.15 am	Q & A Session	3.45 pm	Q & A Session
11.30 am	Session 3: Forum Discussion: Transfer Pricing Audits - After a decade, what have we learned? <u>Moderator:</u> Mr S.M Thanneermalai <i>Managing Director, Thannees Tax Consulting Sdn Bhd</i> <u>Panel Members:</u> Ms Hairaneey Mhd <i>Director, Transfer Pricing Policy Division, Department of International Taxation, Inland Revenue Board of Malaysia</i> Ms Anushia Soosaipillai <i>Partner, Tax-Transfer Pricing, PricewaterhouseCoopers Taxation Services Sdn Bhd</i> Mr Sockalingam Murugesan <i>Partner-ASEAN Transfer Pricing Leader, Ernst & Young Tax Consultants Sdn Bhd</i>	4.00 pm	Session 6: Transfer Pricing vs Customs Valuation - Can there be harmony? <u>Moderator:</u> Mr Alan Chung <i>CTIM Council Member</i> <u>Panel Members:</u> Mr Subhabrata Dasgupta <i>Partner - National Transfer Pricing Leader, Deloitte Tax Services Sdn Bhd</i> Ms Annie Thomas <i>Senior Manager, Tax, PricewaterhouseCoopers Taxation Services Sdn Bhd</i>
		5.00 pm	Q & A Session
		5.15 pm	End of Seminar

For registration, please click at the box below:

REGISTRATION FORM

Closing Date: 2 working days before the event date

The CPD points awarded qualify for the purpose of application and renewal of tax agent license under Section 153, Income Tax Act, 1967.

Speakers' Profile



Alan Chung is currently the Senior Executive Director of Grant Thornton Malaysia. He has more than 20 years of experience in tax compliance, tax advisory and goods and services tax (GST) and played a role in the implementation of the self-assessment system in Malaysia as a seconded to the Inland Revenue Board of Malaysia. He is currently the Council Member of CTIM and is a member of Institute's various committees. In addition, he is also a member of the Malaysian Institute of Accountants (Chartered Accountant) and CPA of Australia (Certified Practising Accountant).



Annie Thomas has fourteen years of experience on indirect tax matters and is currently a Senior Manager of Tax at PricewaterhouseCoopers Taxation Services Sdn Bhd. She was formerly a Senior Assistant Director of Customs II and was with the Sales and Service Tax (SST) Division of Customs. Prior to joining SST Division of Customs, she was attached to the National Revenue Recovery Enforcement Team (NRRET) under the Attorney General's Chamber. Annie was also attached to the GST Fraud Investigation Unit and was actively involved in the implementation of GST as an integral part of the GST implementation team, providing technical support and as a speaker for the GST training courses, workshops and seminars conducted by accredited professional bodies. Annie is a Certified Financial Investigator (AMLATFA) and an Associate member of the Chartered Taxation Institute of Malaysia (CTIM). She is also a recipient of the World Customs Organization (WCO) Award of Excellence in recognition of exceptional meritorious services in the Customs Administration of Malaysia (2018).



Anushia Soosaipillai joined the PricewaterhouseCoopers Malaysia's transfer pricing and investigation group in 1999 and has vast 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.

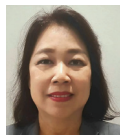


Bernice Tan is an Executive Director, Transfer Pricing at BDO in Malaysia. Prior to this, she was attached with a boutique tax advisory firm for three years. Bernice served as a Director with the International Tax practice of Ernst & Young where she specialised in transfer pricing. Bernice has extensive experience assisting clients with transfer pricing planning and risk management, documentation, tax efficient supply chain management and controversy management. Her clients include both Malaysian and multinational companies involved in a broad spectrum of industries including fast moving consumer products, oil & gas, telecommunications, electronics, industrial and passenger equipment, pharmaceutical products, banking, property development and highways. She also has experience in both compliance and tax related advisory work for local corporations, multinationals and individuals in terms of tax planning exercises, inbound and outbound investments and restructuring exercises. Bernice has wide experience conducting in-house transfer pricing training for clients and is also a trainer at regional transfer pricing schools. She has spoken at various client seminars and participated in transfer pricing workshops for the Chartered Tax Institute of Malaysia and the Malaysian Institute of Accountants, and has contributed to the International Tax Review and Malaysian Business.



Bob Kee 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. Bob is also experienced in

indirect taxes, specifically in the areas of GST and WTO rules of valuation. His experience in transfer pricing and also Customs' valuation rules enables him to provide transfer pricing advice from both a direct and indirect tax perspective. In 2011, Bob earned the distinction of being the first expert witness in Malaysia's first transfer pricing court case (which was decided in favour of his client). Over the years, Bob has developed a good and strong working relationship with the Malaysian Inland Revenue Board and the Royal Malaysian Customs Department. He is a frequent speaker at external transfer pricing events, as well as KPMG organized workshops and seminars for clients.



Dr. Esther A.P. Koisin has a Doctorate degree from Universiti Utara Malaysia, Economics degree from Universiti Malaya and Law degree from University of London. She has more than 30 years of experience in various capacities in LHNDM. On 15 January 2021, she was appointed as the Director of the Department of International Taxation. Prior to that, she has been involved in international taxation for many years and has served as Deputy Director of the Treaty Division, Director of MAP Division and Director of International Affairs and Exchange of Information Division. She has also served for eight years in the International Training Centre of the Malaysian Tax Academy. She represents Malaysia in various OECD working parties including Working Party 10, Working Party 11 and the Automatic Peer Review Group. She has represented Malaysia as a member of the OECD Global Forum Peer Review Group, AEOI Group, and is a current assessor for the Global Forum. She has been a representative of Malaysia to the Inclusive Framework Meetings since the Inclusive Framework was formed in 2016.



Foo 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.



Hisham Rusli is a Director of the Multinational Tax Branch of 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 Director with the Keningau (Sabah) and Melaka Branches, and as Deputy Director of the Large Taxpayer Branch (LTB).



Kalsumawati Mohd Aris is Shell's Head of Tax for Malaysia, Indonesia, Vietnam and Japan. Kalsum has more than 20 years of experience in direct, indirect and employment taxes, with expertise ranging from tax policy, advisory, compliance, corporate structuring, mergers and acquisitions, tax audits and investigations, transfer pricing audits and cross border exposures management. She holds the role as the Convenor of the Fiscal and Economics sub-committee of the Petroleum Production Sharing Contractors Committee (PPSC), a committee of the Malaysian International Chamber of Commerce & Industry (MICCI). She works closely with government authorities, actively advocates for new improved tax policies and has been invited to participate in and provide input to various task forces on tax policy matters. Prior to joining Shell, she was a Tax Manager in the tax practice of Ernst and Young specializing in the Financial Services sector. She holds a Bachelor of Accounting from University of Malaya.



Krystal Ng is a partner in the Tax, Trade and Wealth Management Practice Group of Wong & Partners. Her primary focus is on tax and transfer pricing issues in the context of cross-border transactions as well as post-mergers and acquisition integrations for multinational clients in a wide range of industries. Her practice extends to the provision of strategic tax advice on a broad range of subjects such as income tax, double tax treaties, withholding tax, real property gains tax, assisting with tax incentives and exemptions as well as the planning and management of transfer pricing considerations to achieve an optimal and more tax effective model on a domestic, regional or global level. Krystal is recognised as a Next Generation Partner for Tax by Legal 500 Asia Pacific 2020 - 2021 and Up and Coming for Tax by Chambers Asia Pacific 2021.



Leow Mui Lee is the Senior Executive Director of Tricor Taxand Sdn Bhd. She is a Council Member of CTIM as well as a member of CPA Australia and the MIA. Mui Lee 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 has also managed projects relating to tax audits & investigations, tax risk management as well as tax due diligence. Under Mui Lee's stewardship, Taxand has won numerous awards.



SM Thanneermalai is the Managing Director of Thannees Tax Consulting Services Sdn Bhd (TTCS) and has been working in the field of taxation since 1980. He was previously the Senior Tax Partner of PwC and the Managing Director of Crowe Horwath KL Tax Sdn Bhd. He has over 40 years' experience in dealing with complex tax issues, resolving tax disputes as well as obtaining permissions from various authorities including the Inland Revenue Board of Malaysia, Royal Malaysian Customs Department, Tax Policy Division of Ministry of Finance, MIDA, MDEC. He is the former Chairman of the Board of Trustees of the Malaysian Tax Research Foundation, a member of the Chartered Accountants of England and Wales, and the Malaysian Institute of Accountants. He is also a former President of the Chartered Tax Institute of Malaysia.



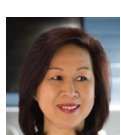
Subhabrata Dasgupta is a partner and the Transfer Pricing Leader in Deloitte Malaysia. He has extensive experience in working with Deloitte network offices in Asia, the EMEA and the Americas on global and regional transfer pricing documentation and planning engagements involving policy design, implementation, 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 14 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. Currently, he is leading the TP Technology and FSI offerings from Deloitte in Malaysia.



Sockalingam Murugesan is the EY Asean Transfer Pricing Leader and he also heads the Transfer Pricing practice in Malaysia. A partner in Ernst & Young Tax Consultants Sdn Bhd, Socka has over 20 years of experience in tax consultancy, of which more than 15 years were in Transfer Pricing. Socka's experience includes leading engagement teams in the preparation of transfer pricing documentation for intangible transactions, and the provision of management services. He has also been involved in the design and implementation support of tax-effective supply chains for clients carrying out wide-ranging cross-border transactions. Additionally, Socka has assisted clients in dealing with the tax authorities on Advance Pricing Arrangements (APA) and transfer pricing audits. He was appointed to chair the APA task force committee when APA regulations were first introduced in Malaysia. Socka is a certified public accountant by the Malaysian Institute of Certified Public Accountants and a member of the Malaysian Institute of Accountants (MIA).



Thenesh Kannaa is a partner at TraTax, a firm of independent tax advisors rated as Top 10 in Malaysia for Transactional Tax (M&A tax) & Indirect Tax. Thenesh advises on both international tax and indirect tax matters to clients from diverse industries including manufacturing, services, distribution, retail, construction, property development, healthcare, financial services, shipping, automotive, telecommunications, societies, GLCs and statutory bodies. Thenesh is a Council Member of CTIM, chair of Technical Committee on Direct Tax I and member of Technical Committee on Transfer Pricing. He is also a member of ACCA's expert panel on taxation, member of Industry Advisory Panel for Taylor's School of Professional Studies and an exco member of the International Fiscal Association's Malaysian branch. Thenesh is also the author of various books and articles on taxation.



Theresa Goh is a Senior Transfer Pricing partner in Deloitte. She led the transfer pricing practice in Deloitte Malaysia for 18 years. She has more than 35 years experience in taxation. Theresa now serves major multinational clients as well as domestic groups. She has substantial experience advising her clients on transfer pricing planning, transfer pricing controversy eg audit defense, appeals and dispute resolution. She has also successfully assisted her clients in resolving complex transfer pricing issues, obtaining favourable tax incentives from the Malaysia Government and APAs. She has been nominated as Asia Transfer Pricing Practice Leader by International Tax Review as well as the Euromoney/ Legal Media's Guide to World's Leading Tax advisors. She is recognized by International Tax Review as Malaysia Leading practitioner in its Tax Controversy Leaders guide. She is currently a Council Member of the Malaysian Institute of Certified Public Accountants (MICPA).