

# Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting – The Time is Now

**Date: 6 May 2021, Thursday**  
**Time: 10.00am – 12.00pm**  
**Event Code: 21WE/008**

## Registration Fee

<b>CTIM/ACCA Member</b>	<b>RM 95.40</b>
<b>Non-Member</b>	<b>RM 127.20</b>

*\*The registration fee is inclusive of 6% service tax*

### IMPORTANT NOTES

- Registration of participant will be confirmed upon receipt of full payment and settlement of previous outstanding dues (if any).
- Webinar Access Link – The webinar access link will be e-mailed to successfully registered participants 2 working days before the commencement of the event upon receipts of full payment.
- Cancellation - The Institute must receive cancellations in writing 5 working days prior to the event. No refund will be given for cancellations received within less than 5 working days of the events.
- Recording - Video recording of the webinar organised by the Institute is not available for distribution.
- Disclaimer – The Organiser reserves the right to change the speaker, date or to cancel the event if the number of participants is less than 20. A minimum of 3 working days notice will be given.

## Introduction

18 February 2021 is a significant date for Corporate Malaysia as Malaysia deposited its instrument of ratification for the Multilateral Convention to Implement Tax Treaty Related Measures to Prevent Base Erosion and Profit Shifting (“MLI”) on 18 February 2021. The MLI will enter into force for Malaysia on 1 June 2021. However, the date on which the provisions of the MLI (such as the application of the principal purpose test (“PPT”) to prevent treaty abuse) will enter into effect for Malaysia’s covered tax agreements listed in the country’s list of reservations and notifications to the MLI will depend on when Malaysia’s treaty partners ratify the MLI.

What is the significance of these? CFOs need to revisit the group’s international holding, financing and licensing structures to ensure that they are compliant. Malaysia will adopt the PPT to prevent treaty abuse. Reduced or zero foreign withholding tax rates on dividend, interest and royalty or even capital gains tax exemption enjoyed in the past may no longer apply. Any additional tax costs must be factored in. Operating models in Malaysia and overseas should be reviewed. A non-taxable presence or no permanent establishment position taken previously may no longer be valid.

Join us in this important webinar where we will share their thoughts on impact of Base Erosion and Profit Shifting/MLI and as to how we should prepare for it.

## Course Outline

- The background of the BEPS initiatives by the Organisation for Economic Co-operation and Development (“OECD”) and G20
- What is MLI and how to apply MLI
- How does MLI change the international tax landscape and how would it affect the businesses: A focus on Action 6 (Preventing the Granting of Treaty Benefits in Inappropriate Circumstances) and Action 7 (Preventing the Artificial Avoidance of Permanent Establishment Status)

## Speakers’ Profile



**Tan Hooi Beng** is the Deputy Managing Director, International Tax Leader and Tax Technical Leader of Deloitte Malaysia. He has more than 22 years of experience in cross-border taxation and has vast experience in advising multinational corporations on corporate structuring and restructuring, mergers and acquisitions, international offshore financial centres, business model optimization, tax treaties and cross-border taxation generally.



**Kelvin Yee** is a core member of the international tax service group in Deloitte Malaysia. Kelvin is experienced in cross-border tax matters. He often advises multinational clients on various cross-border tax issues including cross-border corporate reconstruction, BEPs etc.



**Eunice Hoo** is a member of the international tax service group in Deloitte Malaysia. She has vast experience in advising multinational corporations on tax planning & advisory, mergers and acquisition etc.

**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.

**For Enquiries:**

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