

#### e-CIRCULAR TO MEMBERS

# **CHARTERED TAX INSTITUTE OF MALAYSIA (225750-T)**

e-CTIM No.174/2012

10 December 2012

TO ALL MEMBERS

# December 2012

# IBFD International Tax Academy 20% discount for CTIM members

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Dear colleague,

Since 1989, IBFD's International Tax Academy (ITA) has had a proud tradition of training current and future tax professionals.

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### **Register to Tax Treaty Workshop**

# Register to Transfer Pricing: Intangibles and Intra-Group Finance

We look forward to welcoming you in **Kuala Lumpur**.

Kind regards,

Aurobindo Ponniah Head Asia-Pacific IBFD

\*Not valid in conjunction with other discounts.

# Courses in the spotlight

# **Tax Treaty Workshop**

Location: Kuala Lumpur Level: Advanced

Date: 14 - 15 March 2013

Price: Discounted from \$ 1,150 to \$ 920

Promotional code: CTIM17

# **Topics covered**

- Overview of the PE Concept and of Tax Treaty Anti-Avoidance
- Case Study Multinational Corporate Structure
- Role Play Session Agency PE
- Role Play Session –
  Characterization of Dealings between Head Office and Permanent Establishment
- Case Study Leasing,
  Installation of Equipment and
  Related Services
- Triangular Cases (with complex case study)

Participants will receive a complimentary copy of IBFD Tax Travel Companions for OECD Model Tax Convention.

Full programme | Read more | Register

# <u>Transfer Pricing: Intangibles and Intra-Group Finance</u>

Location: Kuala Lumpur Level: Intermediate Date: 08 - 10 April 2013

Price: Discounted from \$1,400 to \$1,120

Promotional code: CTIM17

# **Topics covered**

#### **Your Instructors**

#### Jan de Goede



Hemal Zobalia



Tarun Arora



# **Contact IBFD**

For further information on IBFD tax courses, tax research services and publications, visit our website or contact us: Tel.:+6-03-2287 0709

Fax: +6-03-2287 0729 ibfdasia@ibfd.org www.ibfd.org



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- The Significance of Intangibles in Transfer Pricing
- Identification and Classification of Intangibles
- Transfer Pricing and Intra-Group Finance: A Growing Controversy
- Inter-Company Guarantees
- The Interaction between Transfer Pricing and Thin Capitalization
- Foreign Exchange and Derivatives

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