

e-CTIM CPD 15/2013

29 March 2013

TO ALL MEMBERS,

CONTINUING PROFESSIONAL DEVELOPMENT (CPD)

Please be informed that the following event has been re-scheduled to **11 June 2013**.

INSIGHTS TO MALAYSIA'S FIRST TRANSFER PRICING LITIGATION:

MM SDN BHD v KETUA PENGARAH HASIL DALAM NEGERI

Time : 9.00 am – 5.00 pm

Venue : Hotel Istana, Kuala Lumpur

On 5.2.2013, the Special Commissioners of Income Tax delivered their decision in Malaysia's first transfer pricing litigation, which favoured the taxpayer. The taxpayer was successfully represented by Datuk D.P. Naban, Mr S. Saravana Kumar and Ms Siti Fatimah Mohd Shahrom of Lee Hishammuddin Allen & Gledhill. Subsequent to a transfer to a transfer pricing audit by the Inland Revenue Board ("IRB") that lasted for more than 2 years, the principal issues faced by the taxpayer, which is one of the world's largest shipping and logistics operators, were as follows:

Issue 1: Commission Rate

Issue 2: Business Process Improvements Services & Regional Services Charges

Issue 3: Penalty

Click [HERE](#) for brochure and registration form.

Please contact the Secretariat for more information or clarification.

Tel : 03-2162 8989
Fax : 03-2162 8990 / 03-2161 3207
Website : www.ctim.org.my
General email : cpd@ctim.org.my

Ms Ramya (ext 119)
Ms Yus (ext 121)
Mr Jason (ext 108)
Ms Ally (ext 123)

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