

ORGANISED BY



Transfer Pricing Conference 2023

A Key To Planning and Compliance

11 October 2023
Wednesday
09AM - 05PM

The Summit Ballroom,
Connexion Conference & Event Centre
@ The Vertical Bangsar South

Key Takeaways:

- Discover the latest developments in Transfer Pricing Rules and Guidelines.
- Obtain clarification on contemporaneous transfer pricing documentation from the tax authority.
- Understand the latest transfer pricing audit issues and trends.
- Direct interaction with renowned transfer pricing experts in Malaysia.

Who Should Attend:

- CFOs
- Tax practitioners
- Accountants
- Company Directors

OPENING REMARKS



Mr. Chow Chee Yen
President
Chartered Tax Institute of Malaysia

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



8 CPD points

(For purposes of Section 153, ITA 1967)

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Time	Programme	Time	Programme
8.50 am	Opening Remarks Mr. Chow Chee Yen <i>President</i> Chartered Tax Institute of Malaysia	1.00 pm	Lunch Break
9.00 am	Decoding the 2023 Transfer Pricing Rules <u>Moderator:</u> Ms. Leow Mui Lee <i>Council Member</i> Chartered Tax Institute of Malaysia <u>Panel Members:</u> Ms. Suhani Anuar <i>Director, Transfer Pricing Division</i> <i>Department of International Taxation</i> Lembaga Hasil Dalam Negeri Malaysia Mr. Sockalingam Murugesan <i>EY Asean Transfer Pricing Leader/</i> <i>Malaysia Transfer Pricing Leader</i> Ernst & Young Tax Consultants Sdn Bhd	2.00 pm	Current Issues in Transfer Pricing Audits & Common Errors <u>Moderator:</u> Mr. Harvinder Singh <i>Council Member</i> Chartered Tax Institute of Malaysia <u>Speaker:</u> Ms. Anushia Soosaipillai <i>Partner</i> PricewaterhouseCoopers Taxation Services Sdn Bhd <u>Panel Member:</u> Ms. Hamisah Ismail <i>Director, Multinational Tax Branch</i> Lembaga Hasil Dalam Negeri Malaysia
10.30 am	Morning Refreshments	3.15 pm	Merits of using profits split methodology in implementing transfer pricing policies <u>Moderator:</u> Mr. K Sandra Segaran <i>Tax Advisor</i> <u>Speaker:</u> Mr. S.M. Thanneermalai <i>Managing Director</i> Thannees Tax Consulting Services Sdn Bhd
11.00 am	Contemporaneous Transfer Pricing Documentation – An Industry Perspective <u>Moderator:</u> Mr. Thenesh Kannaa <i>Council Member</i> Chartered Tax Institute of Malaysia <u>Panel Members:</u> Mr. Bob Kee <i>Partner, Head of Global Transfer Pricing Services and China Practice in Malaysia</i> KPMG Tax Services Sdn Bhd Ms. Ng Say Guat <i>Head of Tax</i> Sime Darby Plantation Group	4.15 pm	Managing Financial Assistance Transactions with Related Parties <u>Moderator:</u> Mr. Tan Chin Teck <i>Executive Director</i> BDO <u>Speaker:</u> Mr. Anil Kumar Gupta <i>Director</i> Deloitte Tax Services Sdn Bhd <u>Panel Member:</u> Ms. Sylvia Song <i>TP Executive Director</i> Crowe Malaysia
12.00 pm	Transfer Pricing Considerations in SVDP 2.0 – Risk v. Rewards <u>Moderator:</u> Mr. Alan Chung <i>Council Member</i> Chartered Tax Institute of Malaysia <u>Panel Members:</u> Ms. Theresa Goh <i>CEO & Founder</i> TG Consulting Sdn Bhd Ms. Kalsumawati Mohd Aris <i>Country Tax Manager</i> Shell Malaysia Limited	5.30 pm	Afternoon Refreshment & End of Conference

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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 secondee 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).



Anil Kumar Gupta is a Director with Deloitte Transfer Pricing practice in Kuala Lumpur, Malaysia. He has more than 14 years of experience in dealing with some of the largest multinational corporations around the world. He deals with clients which are from diverse sectors/industries such as Telecoms, Automotive, Consumer Products, Technology, and IT/ITES. Over the years, Anil has consulted on various transfer pricing matters such as evaluation of transfer pricing models, involvement in Advance Pricing Agreement procedures and MAP cases, assisting clients in the preparation of transfer pricing policies and operationalizing transfer pricing in the new set-ups; involved in high-end litigation on complex transfer pricing issues; providing compliance services to clients and representation on behalf of clients in TP audit proceedings; planning engagements which cover extensive advisory on international tax and transfer pricing matters.



Anushia leads the PwC Transfer Pricing practice and has more than 20 years of transfer pricing experience in PwC Malaysia. Her vast experience includes assisting and advising companies in various transfer pricing projects and defending challenges to transfer prices by tax authorities in tax audits and investigation. She has successfully worked on a number of MAP and APA cases over the years. She is Board of Governor for the American Malaysia Chamber of Commerce (AMCHAM) and sits in the Transfer Pricing Technical Committee of CTIM. She is a regular author for IBFD publications.



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).



Kalsumawati Mohd Aris leads the tax function of Shell Malaysia with 25 years of experience in direct (both Petroleum Income Tax and Corporate Income Tax), 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 ensures that the Shell Malaysia Group of Companies comply with the letter and the spirit of the tax laws. She also 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 specialising in the Financial Services sector. She holds a Bachelor of Accounting from University of Malaya.



K Sandra Segaran is formerly the Chairman of the Board of Trustees of the Malaysian Tax Research Foundation (MTRF). He served as General Manager (Group Tax) in Petronas for over 7 years. Prior to that, he was an Executive Director in Deloitte Malaysia where he served 8 years, including a stint of 3 years as head of International Tax in the Malaysian practice. He started his career in Taxation in the Inland Revenue Board, where he served 22 years. Segaran's over 37 years of tax experience covers a wide range of industries and legislation relating to all matters of Malaysian Taxation. A former council member for over 8 years, he also serves as a committee member of CTIM's Direct Tax Technical Committee, Editorial Board and National Tax Conference 2023 Organising Committee. He is currently the Consultant Editor of Wolters Kluwer's Master Tax Guide.



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.



Hamisah Ismail is currently the Director of Multinational Tax Branch. She holds a degree in Accountancy from Northern University of Malaysia Through out her career in Inland Revenue Board of Malaysia, she involves in auditing financial data of small medium size companies and multinational companies in various industries of trading and marketing, services, telecommunication, and manufacturing. Over the years, she has been actively involved in discussion and dissemination of practical inputs relating to enhancement as well as amendment of TP rules and guidelines.



Harvinder Singh is a Fellow of the Chartered Association of Certified Accountants and is a member of the Malaysian Institute of Accountants (MIA) as well as the Chartered Tax Institute of Malaysia (CTIM). Harvinder was attached to the tax divisions of PwC and E&Y and is currently the Managing Partner of Harvey & Associates, a boutique firm that specialises in taxation consulting services as well as the Tax Partner in SCS Global Consulting (M) Sdn Bhd. Harvinder has more than 29 years of extensive experience in taxation advisory, transfer pricing documentation preparation, tax planning as well as tax audits and investigations and he serves as a Tax Specialist to numerous corporate entities such as SK International (M) Sdn Bhd and other MNEs and organisations. He is currently serving as the Chairman of the Editorial Board of the Budget Commentary and Tax Information Booklet which is produced jointly by MIA, CTIM, and MICPA. Mr. Harvinder is a Council Member of CTIM.

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Ng Say Guat has been practicing tax for 30 years and has experience in the profession and in industry. She is the Head of Tax at Sime Darby Plantation Group and is responsible for tax matters of the Group which has operations in Malaysia and overseas. She is a member of CPA Australia, MIA and CTIM. She also serves on the Direct Tax Technical Committee of CTIM.



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.



SM Thanneermalai is the Managing Director of Thannees Tax Consulting Services Sdn Bhd, and a renowned tax expert in Malaysia with over 40 years of experience in handling complex tax issues, resolving tax disputes, and obtaining special permissions from various government agencies. He is a pioneer in transfer pricing, establishing Malaysia's first transfer pricing practice in 1996 at PricewaterhouseCoopers Malaysia. As former President of the CTIM and Chairman of the Board of Trustees of the Malaysian Tax Research Foundation, he contributed to the development of tax laws in Malaysia. He was also a Senior Tax Partner at PricewaterhouseCoopers for 22 years and Managing Director of Crowe Horwath KL Tax Sdn Bhd for 2 years. Currently, he is a licensed tax agent and a member of multiple professional organisations—the Institute of Chartered Accountants in England & Wales, MIA, and CTIM.



Suhani Anuar has started career with IRBM in 1999 and has been in various departments including Tax Policy Department, Investigation Department, Malaysia Tax Academy and KL Collection Branch, to name a few. Leveraging on her vast experiences in tax audit and investigation as well as tax advisory on tax policy, tax incentives and LBATA implementation, she is now heading the Transfer Pricing Division of Department of International Taxation. Prior to the current designation, she was a division director of Monitoring and Compliance Division in Multinational Tax Branch overseeing the processing on appeals and reliefs. She holds a master degree in forensic accounting & financial criminology from UiTM and bachelor degree in accountancy from UKM.



Sylvia Song is an Executive Director of Crowe KL Tax Sdn Bhd in Malaysia. She specialises in transfer pricing (TP) and leading a TP team in Crowe Kuala Lumpur. She has been involved in various TP assignments such as TP documentation, TP planning, price setting, TP audits & investigation, regional TP work, etc. Sylvia has worked in the tax professional environment for over 13 years and has the experience in tax compliance, tax advisory including individual / corporate tax matters, tax incentives, transfer pricing, tax planning, GST and others. She services both domestic and multinational clients and manages a portfolio from a broad range of industries such as manufacturing, trading, services, property development, construction, digital business, etc. She has conducted various transfer pricing seminars to clients / public.



Tan Chin Teck is an Executive Director in Transfer Pricing at BDO in Malaysia. He has over 11 years of working experience in audit, tax and advisory services. He started his career in Deal Advisory department of KPMG Malaysia in 2011 and worked on M&A and post-acquisition structuring projects, including financial & tax due diligence, tax structuring advice and SPA review. Prior to joining BDO, he was also involved in various cross-function projects which include Transfer Pricing, Implementation of GST, External Audit, and Implementation of MFRS 9 Financial Instruments. Chin Teck then joined the Transfer Pricing practice of BDO Malaysia, advising clients on transfer pricing compliance and advisory issues. His diverse work experience enables him to help clients review, document, manage and defend their transfer pricing policies and processes.



Thenesh Kannaa is Executive Director of TRATAX Sdn Bhd in-charge of both transfer pricing and indirect tax service lines, covering clients from diverse industries from manufacturing to specialized sectors like oil & gas and automotive. Thenesh is a Council Member of CTIM, Chairman of the 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 and an exco member of the International Fiscal Association (IFA)'s Malaysian branch. Thenesh is author on 3 books on Malaysian taxation, 2 chapter-in-books for IFA and IBFD respectively and author of various technical articles. In addition to having presented in hundreds of tax conferences and seminars in Malaysia and regionally, he is also frequently interviewed by media (the Star, the Sun newspaper, RTM and BFM radio) on contemporary tax matters.



Theresa Goh is the Founder and CEO of TG consulting sdn bhd. She is currently providing Transfer Pricing (TP) services to multinational as well as local clients. These services include TP Audit Defence, Tax and TP Advisory, Preparation of TP Documentation and APA negotiation. She also advises and assists local and multinational clients with their applications for tax incentives. She is a Certified and Accredited Trainer with HRD Corp. She has conducted training for professional bodies (MIA, MICPA & CTIM) and has provided in house training to local conglomerates on Transfer Pricing. Prior to TG Consulting, she was a Senior Tax Partner in Deloitte Southeast Asia for 19 years. In a career spanning more than 40 years in Deloitte, she served major multinational clients in addition to domestic corporates. She served as the National Transfer Pricing Leader for 18 years.

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CATEGORY	REGISTRATION FEE
CTIM Member/Student	RM795.00
Member's Firm Staff	RM901.00
Non Member	RM954.00

Important Notes:

1. The registration fee is inclusive of 6% service tax.
2. Member's Firm Staff is the staff/colleague of a CTIM Member within the same firm.
3. Please select the participant category carefully as it determines the fee payable. No alteration will be allowed upon registration.

ONLINE REGISTRATION PROCESS

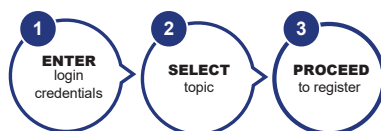
**Kindly follow the respective steps below*

STEP 1

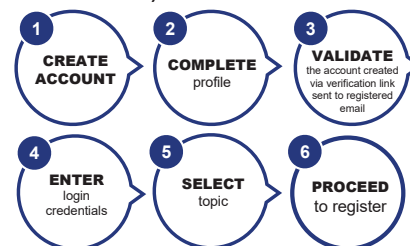
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STEP 3

i) EXISTING USER



ii) NEW USER



STEP 2

Go to SIGN IN

***CLOSING DATE: 2 days before the event date.**

TERMS AND CONDITIONS

Registration and Payment

With immediate effect, registration for all CPD programmes will be STRICTLY VIA ONLINE REGISTRATION ONLY.

Registration of participant will be confirmed upon receipt of full payment and settlement of previous outstanding dues (if any).

Cancellation

Registration fees are non-refundable and non-transferable once registration has been confirmed. No refund will be entertained for cancellation/withdrawals or no show on the day of the seminar. Cancelled unpaid registration will also be liable for full payment of the registration fee.

Replacement

No replacement is allowed. It will be considered as a cancelled registration. Replacements for cancellation will be treated as a new registrations and full payment shall be made accordingly.

Confirmation of registration	A confirmation email will be issued within 7 working days before the conference to the confirmed registration.
Verification of Attendance	Must register before 10.00am on the conference day.
e-Certificate of Attendance	The Certificate of Attendance will only be released to the registered participant with full attendance and full payment within 7 working days after the completion of the conference.

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