

Preparing a Defense-Ready Transfer Pricing (TP) Documentation which Complies with TP Rules 2023

Date : 17 April 2024, Wednesday
Time : 9.00 am – 5.00 pm
Event Code : 24WS/021

Registration Fees

CTIM Member	RM387.00
Member's Firm Staff	RM448.00
Non Member	RM509.00

*The above registration fees are inclusive of 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 receipt of full payment.
- Cancellation - The Institute must receive cancellations in writing not less than 5 working days prior to the event. No refund will be given for cancellations received within less than 5 working days of the event.
- 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. A minimum of 3 working days notice will be given.

Introduction

Will your TP documentation be able to meet the requirements of the Transfer Pricing Rules 2023 which is effective for the Year of Assessment 2023? Non-compliance will result in a penalty of RM20,000 to RM100,000 per year of assessment or imprisonment up to six months on conviction.

A Contemporaneous TP Doc has to:

- be prepared before the due date for furnishing your tax returns
- contain all relevant information mentioned in the new Schedules 1, 2 and 3
- indicate the date on which the Contemporaneous TP Doc is completed
- contain any information, data or related documents to determine the arm's length price

Another question to ask is whether your TP Documentation is adequate for an audit defence? Will it be able to support the TP positions taken by you?

Any TP adjustments that IRB may make for non-arm's length transactions will carry a surcharge of 5% of the amount of the adjustment. Are you prepared for a TP audit?

Objectives

This programme will cover:

- The requirements of the latest TP Rules 2023
- How to manage the challenging areas of preparing a Contemporaneous TP Doc
- Suggestions for gathering the relevant info, data and docs on a timely basis
- Assess the adequacy of your TP doc in preparing for a TP audit by the Tax Authorities

Course Outline

Session 1: TP Rules 2023

- Quiz
- Understanding the requirements of TP Rules 2023
- Additional info, data and doc requirements in Schedules 1 and 2
- IRB's Feedback on Common Areas of Non-Compliance
- Penalty for non-compliance with TP Rules 2023
- Q&A

Session 2: Challenging Areas of TP Documentation Preparation

- Meeting the deadline
- Characterisation and TP Policy
- Transaction-by-transaction method vs Whole of entity method
- Choosing suitable Comparables
- Case studies
- Intra-group services
- Intra-group financing
- Q&A

Session 3: TP Audits

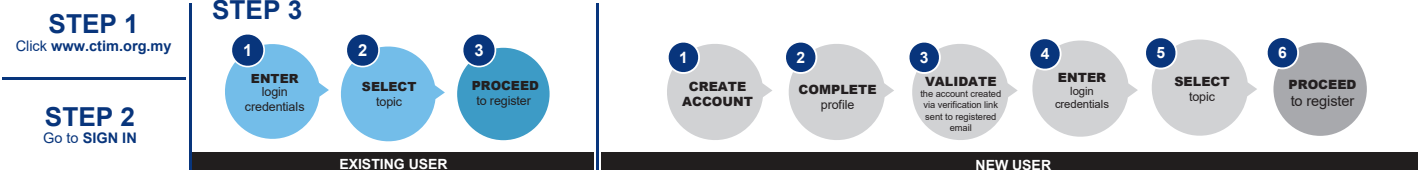
- Latest Update on TP Audits
- Common TP Audit Issues
- Case studies
- TP risk assessment
- TP risk mitigation
- Q&A
- Quiz

Speaker's Profile

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.

ONLINE REGISTRATION PROCESS

*Kindly follow the respective steps below



For Enquiries:

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Closing Date

2 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.

