

Webinar Series

Transfer Pricing: Revised Scope, Requirements & Audit Approach

Date: 12 March 2025, Wednesday

Time: 9:00 am – 5:00 pm

Event Code : 25WS/009

Registration Fees

Category	Registration Fees (exclusive of Service Tax)
CTIM Member	RM360.00
Member's Firm Staff	RM415.00
Non-Member	RM475.00

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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 cancellation received within less than 5 working days of the event.
- **Recording** – Video recording of the webinar organised by the institute is not available for distribute.
- **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

The 190-page Transfer Pricing Guidelines published on 24th December 2024 comprise of 11 chapters. Tax and finance professionals must take note of the salient features on immediate basis given most of the changes are effective from the year of assessment 2023. Concurrently, the Transfer Pricing Audit Framework is also revised effective from 24th December 2024 with insights on the application of the RM20,000 to RM100,000 penalty for failure to prepare TP documentation on contemporaneous basis, alongside the surcharge for any TP adjustment.

This webinar is well-positioned to provide tax and finance professionals across Malaysia to be well-informed of the key technical developments arising from the transfer pricing guidelines and audit framework, and its practical implications on businesses.

Objective

To empower participants with the knowledge of :

- The scope of who is required to prepare TP documentation
- Permissibility and requirements of minimum TP documentation
- Key technical features from TP Guidelines 2024
- Practical updates from TP Audit Framework

Speakers' Profile

Thenesh Kannaa is an Executive Director at TRATAX Sdn Bhd, a tax consulting firm based in Kuala Lumpur. He is a licensed tax agent for income tax, a member of the Malaysian Institute of Accountants (MIA) and the International Fiscal Association (IFA, Netherlands), and a fellow member of the Association of Chartered Certified Accountants (FCCA, UK), the Chartered Tax Institute of Malaysia (CTIM) and an ASEAN Chartered Professional Accountant (ASEAN CPA). Thenesh is involved in CTIM's activities 2012 in various capacities including his present roles as Council Member, Chairperson of Tax Policy Committee and a member of Transfer Pricing Committee. He is also an exco member of IFA's Malaysian branch. Thenesh is author of three (3) published books in taxation and two (2) chapter-in-book for renowned international publications. He is frequently interviewed on contemporary tax matters by mainstream media outlets including the BFM radio, Astro Awani, BERNAMA, the Edge business weekly, the Sun newspaper and the Star newspaper. Thenesh is both a tax practitioner and a seasoned speaker who has presented in over 100 tax conferences, seminars and forums hosted in Malaysia, Australia, China, Hong Kong, India, Indonesia, Japan, Netherlands, Portugal, Singapore, Taiwan and Thailand.

Nasha Raina Rahim & Chui Jia Yi are transfer pricing specialists at TRATAX Sdn Bhd. Their experience on transfer pricing documentation spans both Malaysian entities and multinational operations in Malaysia, across various sectors including automotive, distribution, shipping services and manufacturing services. Their experience also includes preparation of TP documentation for management services, shared services, rental charges and financing arrangements. Nasha has represented taxpayers on transfer pricing audits and Mutual Agreement Procedure (MAP) matters. She has been actively involved in assisting companies to implement and operationalise an effective transfer pricing policy. Her experience includes conducting TP briefings and advisory works of diverse nature.

Time	Programme
9:00 am – 10:30 am	Session 1 – Overview Speaker : Thenesh Kannaa <ul style="list-style-type: none"> Key concepts in Transfer Pricing (TP). Definition of 'control' and its implications on private owned companies (e.g. common director companies) and Joint Venture arrangements. Understanding the thresholds for exemption from preparation of full Transfer Pricing Documentation (TPD). Minimum TPD : permissibility & pitfalls to avoid. Case Studies.
10:30 am – 12:15 pm	Session 2 – Documentation Aspects Speaker : Nasha Raina Rahim <ul style="list-style-type: none"> New Arm's Length Range. Computation of median and its significance. Contents of TPD (Full vs Minimum). Highlight of key steps in comparability analysis, with emphasis on new requirements provided for in the Guidelines. Comparative analysis with the predecessor TP Guidelines ; with an emphasis on 'what has changed'.
12:15 pm – 1:00 pm	Session 3 – Intragroup Services & Low Value Adding Services Speakers : Thenesh Kannaa & Chui Jia Yi <ul style="list-style-type: none"> Permissibility to use the pre-determined 5% mark-up. Understanding the exclusions. Implication on inbound service charges (e.g. from overseas parent entity). Dealing with pass-through costs. Principles applicable for deductibility of the intragroup service costs. Case Study.
2:00 pm – 3:00 pm	Session 4 – Intangible Property & Restructuring Speaker : Thenesh Kannaa <ul style="list-style-type: none"> DEMPE requirement. Case studies on royalty payments and advertising, marketing, and promotional ("AMP") expenses borne by Malaysian manufacturers and distributors. Tax and transfer pricing implications arising from change in functional profile and/or pricing policy, aka. restructuring.
3:00 pm – 3:45 pm	Session 5 – Financing Arrangements Speakers : Nasha Raina Rahim & Chui Jia Yi <ul style="list-style-type: none"> TP documentation requirement for financing transactions. Dealing with interest-free advances.
3:45 pm – 4:30pm	Session 6 – Dealing with TP : Centric Tax Audits Speaker : Thenesh Kannaa <ul style="list-style-type: none"> TP adjustments and surcharge. Can a TP adjustment lead to both 5% surcharge and the Section 113 (2) penalty? Satisfying the 'contemporaneous' definition to avoid the RM20,000 to RM100,000 penalty under Section 113B. Justification for loss-making years or below arm's length range: common mistakes to avoid. Tips for effective management of TP-centric tax audits. Voluntary disclosure for TP matters.
4:30pm – 5:00pm	Overall Q&A All Speakers

Who Should Attend?

- Tax Professionals
- Corporate Accountants
- Finance Managers

Methodology

- Lecture with case studies

Online Registration Process

*Kindly follow the respective steps as below

STEP 1

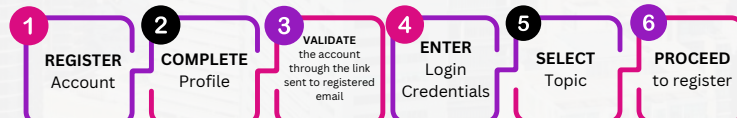
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Closing Date

2 days **before** the event date

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8 CPD points
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