



Transfer Pricing

PRACTICAL ASPECTS OF TRANSFER PRICING DOCUMENTATION

Beneficial for:

- ◆ CEOs, CFOs, COOs
- ◆ Finance Personnel
- ◆ General Managers
- ◆ Tax/TP Managers

Objectives:

- Provide you the knowledge and the guidance to prepare your own transfer pricing documentation supported by a detailed walk through of the various requirements with practical examples.
- Provide practical insights in preparing transfer pricing documentation.
- Give you an overview of the transfer pricing principles and the latest requirements of the Inland Revenue Board (IRB).
- Provide examples of the common mistakes which should be avoided.

Programme Outline

8.00 - 8.45: Registration

8.45 - 9.00: Safety Briefing and Welcome Address

9.00 - 9.20: Introduction of the Tax/Transfer Pricing Scene In Malaysia

- ▶ Overview of the tax/transfer pricing scene in Malaysia
- ▶ Issues faced by taxpayers
- ▶ IRB's main focus

9.20 - 10.00: Explaining the Latest Changes to the Malaysian Transfer Pricing Guidelines

- ▶ Arm's Length Principle
- ▶ Aligning the returns to value creation
- ▶ Risk analysis
- ▶ Dealing with intangibles (e.g.: Royalty, Licensing, etc.)

10.00 - 10.30: Coffee Break

10.30 - 1.00: Building Blocks of Documentation (Part 1)

- ▶ Organisational chart
- ▶ Overview of group
- ▶ Overview of local entity
- ▶ Industry analysis
- ▶ Description of controlled transactions
- ▶ Analysis of pricing policies

1.00 - 1.45: Lunch Break

1.45 - 3.15: Building Blocks of Documentation (Part 2)

- ▶ Comparability analysis
- ▶ Functional analysis
- ▶ Risk analysis
- ▶ Financial analysis
- ▶ Selection of transfer pricing method
- ▶ Application of transfer pricing method

3.15 - 3.45: Tea Break

3.45 - 5.15: Special Issues in Transfer Pricing

- ▶ Price allocation for intragroup services
- ▶ Analysis and pricing policy of intangibles
- ▶ Issues related to intragroup financing - Interest free loans

Tuesday 19 June 2018

8.45 AM - 5.15 PM

Imperial Hotel, Kuching

8 CPD Hours • HRDF Claimable

Speaker's Profile: SM Thanneermalai



SM Thanneermalai has been working in the field of taxation since 1980. He started the first transfer pricing practice in Malaysia back in 1996. He has extensive experience in handling

a vast variety of transfer pricing and corporate tax assignments. He specializes in assisting multinational companies and local conglomerates in preparing transfer pricing documentation, handling transfer pricing disputes and set transfer prices. He works very closely with the Inland Revenue Board of Malaysia, Royal Malaysia Customs Department, the Tax Policy Division of the Ministry of the Finance, MIDA, MDEC, and etc.

Current roles:

- Managing Director of Thannees Tax Consulting Services Sdn Bhd
- Chairman of the Board of Trustees of the - Malaysian Tax Research Foundation
- Member of the Chartered Accountants of England and Wales (ICAEW) and the Malaysia Institute of Accountants (MIA)

About Priority One Tax Services Sdn Bhd

Priority One was incorporated in Malaysia in October 2006.

We are a specialist professional firm providing tax advisory and compliance services.

We focus on :

- Individual and Corporate Tax
- Tax Planning, Tax Restructuring, Tax Investigation and Appeals
- GST Advisory, Review, Implementation and Appeals
- Training and Learning solutions for in-house and public

Previous roles:

- President of the Chartered Tax Institute of Malaysia (CTIM) (July 2012 - June 2014)
- Senior Tax Partner of PriceWaterhouse Coopers (till June 2015)
- Managing Director of Crowe Horwath KL Tax Sdn Bhd (June 2015 - December 2017)

REGISTRATION FORM

Full Name

I.C. No.

Designation

Email

Organisation

Industry

Address

Tel Fax

Vegetarian Meal? (Yes/No)

DATE : Tuesday 19 June 2018

TIME: 8.45 AM - 5.15 PM

VENUE : Imperial Hotel, Kuching

FEE : RM 450 Per Pax (GST 0% Inclusive)

Fee includes workshop handouts, lunch, practical session hands-on notes & Certificate of Attendance.

This seminar grants 8 CPD hours. It is HRDF claimable under the Skim Bantuan Latihan, subject to approval by Pembangunan Sumber Manusia Bhd.

PAYMENT METHOD

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