



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

26 April 2018

9.00 am - 5.30 pm

Renaissance Hotel

KL

RM 375 (inc. GST)

Programme Outline

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

1.00-2.00: Lunch

2.00-3.30: Building blocks of documentation (Part 2)

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

3.45 - 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

Methodology

Lectures accompanied with practical examples and sharing of past experience of the speaker.

Contact us

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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 position :

- 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)

Prior roles :

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

About us

We are a tax consultancy firm providing specialist tax services. The main value that we bring to you is Mr Thannee's years of experience dealing with complex tax issues, resolving tax disputes as well as obtaining special permissions from the various authorities including his advocacy and skills representing tax payers with the authorities.

Our Approach

Our fundamental approach to all disputes with the authorities will be non-confrontational, reconciliation and amicable settlements which will provide certainty and peace of mind to taxpayers. Whenever possible, we will try to obtain formal and informal confirmation from the relevant authorities in order to provide certainty and finality

Our Services

- Transfer Pricing
- Voluntary Settlement
- Obtaining permissions
- General tax advisory