

25 & 26 OCTOBER 2023

INTENSIVE CLASSROOM TO PREPARE CONTEMPORANEOUS TRANSFER PRICING DOCUMENTATION

KEY OBJECTIVES

- Comprehensive guidance to prepare your own Contemporaneous Transfer Pricing Documentation (CTPD) in line with the Income Tax (Transfer Pricing) Rules 2023
- Examples of wordings and templates for the various sections of the CTPD will be provided
- How to present the information required and avoid common mistakes
- Interactive dialogue sessions to help you apply the principles

COURSE OUTLINE

DAY 1, 9AM - 5:30PM

- **Introduction to Transfer Pricing**
- **Income Tax (Transfer Pricing) 2023 and Section 140A of the Income Tax Act 1967 explained**
- **Basics of the Arm's Length Principle & it's Application**
- **Comparability Analysis**
 - Contractual terms, Functional, Assets & Risks Analysis, Characteristics of properties/services, Economic Circumstances, Business Strategies
- **Transfer Pricing Methodologies**
 - Comparable Uncontrolled Price, Resale Price, Cost Plus, Profit Split & Transactional Net Margin
- **Building Blocks of Transfer Pricing Documentation - Part 1**
 - Group information and group ownership structure (as per Schedule 1 of 2023 TP Rules)
 - Organization structure
 - Nature of the business, Industry and market conditions

DAY 2, 9AM - 5:30PM

- **Building Blocks of Transfer Pricing Documentation - Part 2**
 - Controlled Transactions
 - Details of pricing policies
 - Assumptions, Strategies and Information regarding factors that influence the setting of pricing policies
- **Building Blocks of Transfer Pricing Documentation - Part 3**
 - Functional Analysis
 - Risk Analysis
 - Financial Analysis
- **Building Blocks of Transfer Pricing Documentation - Part 4**
 - Comparability analysis
 - Selection and application of TP Methodology
 - BONUS: Benchmarking analysis, Step-by-step walkthrough
 - Financial information
- **BONUS: Transfer Pricing Documentation for Intragroup Financing Arrangement & Intragroup Services**



RM4,500
(excluding service tax)

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SPEAKER'S PROFILE



Mr Thanneermalai is the pioneer in Transfer Pricing (TP) having started the 1st TP practice in 1996. He has more than 40 years of experience in the tax field and is an expert on TP. He was the former Senior Tax Partner at PwC, Managing Director of Crowe Horwath, Chairman of the Board of Trustees of the Malaysian Tax Research Foundation and also the former President of CTIM.



Sindupriyah is a tax and transfer pricing professional with over 13 years' experience. She has built vast knowledge and experience in transfer pricing, tax audit, tax due diligence, tax advisory, tax incentive applications and tax compliance. Her specialties include transfer pricing audits, dealing with complex transfer pricing restructuring, price setting exercises, and transfer pricing documentation.




Wai Lan's experience in taxation spans 36 years during which she was exposed to tax compliance, tax advisory and tax appeals on matters covering income tax, withholding tax, real property gains tax, indirect tax and transfer pricing. She has hands-on experience in preparing transfer pricing documentation and is a regular speaker on various taxation topics including transfer pricing and stamp duty.



Lee Chak Wei has almost 10 years of experience in providing tax advisory and tax compliance services. He has vast technical knowledge in tax consulting, transfer pricing advisory, tax planning, tax incentive applications, tax audits and investigation as well as tax review works. He has also been involved in assisting companies with tax dispute resolutions with the Inland Revenue Board of Malaysia.

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