

# TRANSFER PRICING: PRACTICAL PREPARATION FOR TRANSFER PRICING AUDIT

**KUALA LUMPUR 7 AUGUST 2019**

## INTRODUCTION

Transfer pricing is a complex subject and is a topic that most persons are not familiar with. Many may not even be aware that they could fall under transfer pricing audits by the Inland Revenue Board and as such, they are not prepared with the necessary pricing policies or documentation with which they could defend themselves.

## LEARNING OUTCOMES

- Explain the various provisions of the relevant law, that is, Sections 140, 140A, and The Transfer Pricing Rules 2012.
- Be informed on what the director general's authority is regarding this subject and the adjustments he could make.
- Explore the pricing policies you should put into place and the various pricing methodologies you could adopt.
- Examine the requirements of contemporaneous transfer pricing documentation, what it means, and how they should be prepared and maintained.
- Review the trigger factors that could prompt the director general to select a company or individual for investigations and the best way to comply with the law.
- To go through Revenue's transfer pricing guidelines and learn how to conduct their business in a way that minimises exposure to additional taxes and penalties.

## WHO SHOULD ATTEND

Directors and senior corporate officers, accountants, auditors, financial managers, company secretaries and tax practitioners.

## PRESENTER

Mr Vincent Josef

All our workshops are available via in-house training.

## EARLY BIRD SPECIAL

Enjoy **10%** savings when you register online at least **one** month before the workshop date.

## EVENT DETAILS

Wednesday 7 August 2019

**TIME**  
9.00am – 5.00pm

**VENUE**  
CPA Australia Seminar Room  
Suite 10.01, Level 10  
The Gardens South Tower  
Mid Valley City  
Lingkaran Syed Putra  
59200 Kuala Lumpur

**FEE** (inclusive of 6% Service Tax, lunch and tea-breaks)  
Member: RM349.80  
REP/Member staff: RM455.80  
Non-member: RM583.00

**LHDNM AGREED**  
for tax license renewal & application



Based on the merit of each applicant

**LEVEL**  
**COMPETENT**

**CLAIM UP TO**  
**8 CPD HOURS**



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## KEY TOPICS COVERED

### Transfer pricing

- The law – Sections 140, 140a and transfer pricing rules: tangibles and intangibles
- What are transfer pricing trigger factors?
- The various acceptable pricing methodologies

### Cross-border/inter-company transactions

- Transfer pricing and arm's length dealings
- What constitutes related parties?
- Control – directors and equity
- Transfer pricing and individuals

### Transfer pricing contemporaneous documentation

- What is contemporaneous documentation?
- Who must prepare and approve it
- Changes and reviews
- Internal and external comparables
- Advance pricing arrangements and advance rulings
- Revenue action – finalisation, penalties and appeals

### Highlights of Budget 2019

## SPEAKER'S PROFILE

### MR VINCENT JOSEF

Vincent is a former Assistant Director General (Operations Division) of the Inland Revenue Board (IRB). Having served 37 years in various branches, he is recognised for his wealth of tax knowledge and is much sought after in the Malaysian taxation seminar circuit.

He has wide experience in speaking at IRB events, professional conferences both locally and abroad, and professional institutions. He has written a book, *Tax Audit and Investigation Guide – Malaysia*, published by CCH Malaysia and he is also their Consultant Editor for the *Malaysia Master Tax Guide*, a position he has served in for the last six years.

His expertise acquired over 50 years in taxation includes monthly tax deductions, personal and corporate taxation, and tax investigations and audits. He also provides taxation consultancy services specialising in tax audits, investigations, appeals, and problem resolution.

## AGREED BY LEMBAGA HASIL DALAM NEGERI MALAYSIA (LHDNM)

The topic discussed in the workshop was agreed upon by LHDNM and the CPD hours are recognised by Ministry of Finance as Continuing Professional Development (CPD)/ Continuing Professional Education (CPE) points for the application and renewal of tax agent license.

# REGISTRATION FORM

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## 1 PARTICIPANT DETAILS

<b>PARTICIPANT 1</b>	Attending as	<input type="checkbox"/> Member	<input type="checkbox"/> REP / Member staff	<input type="checkbox"/> Non-member
Full name as per I/C <small>(Dato' / Datin / Dr / Mr / Mrs / Ms)</small>	CPA Australia Member ID			
Position	Email*			
Mobile	Special dietary requirements (if any)			
<b>PARTICIPANT 2</b>	Attending as	<input type="checkbox"/> Member	<input type="checkbox"/> REP / Member staff	<input type="checkbox"/> Non-member
Full name as per I/C <small>(Dato' / Datin / Dr / Mr / Mrs / Ms)</small>	CPA Australia Member ID			
Position	Email*			
Mobile	Special dietary requirements (if any)			
<b>PARTICIPANT 3</b>	Attending as	<input type="checkbox"/> Member	<input type="checkbox"/> REP / Member staff	<input type="checkbox"/> Non-member
Full name as per I/C <small>(Dato' / Datin / Dr / Mr / Mrs / Ms)</small>	CPA Australia Member ID			
Position	Email*			
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\*Workshop confirmation will be sent to the stated email address.

## 2 CONTACT AND BILLING INFORMATION

Contact Person	Billing Address			
Phone				
Email				
Company Billing Name	State	Postcode		
Business Registration no.	Industry			

## 3 WORKSHOP AND PAYMENT DETAILS

NO.	WORKSHOP TITLE	DATE	LOCATION	PRICE	QTY	FEE (RM)
1						
2						
3						
<b>TOTAL</b>						RM

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Please indicate registrants full name, membership number and contact number on the back of the cheque.

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Signature  / /