

Deloitte.



Transfer Pricing: New Reporting Requirements Seminar

Are you ready?

Thursday, 22 March 2018
2.00 p.m. – 5.00 p.m.

The Springboard
Deloitte Tax Services Sdn Bhd
Level 12B Hunza Tower
163E Jalan Kelawei
10250 Penang



Overview

Transfer Pricing (TP), as one of the measures of anti-avoidance, is evolving around the world and Malaysia is on par to align it to the global standards. This fact is established with the recent spurt of changes introduced by Malaysia on TP in line with Base Erosion and Profit Shifting (BEPS) action plans coined by the Organisation for Economic Co-operation and Development (OECD). These revisions primarily pertain to the introduction of a new three-tier documentation structure (Country-by-Country Reporting (CbCR), Master file, in addition to local TP documentation), expanded scope of contents of local TP documentation and conditions of periodicity of refresh of TP documentation, increase in scope for levy of penalties, new guidelines on intangibles and commodity transactions, etc.

In parallel, the Revenue Authorities have geared up for intense TP scrutiny based on the recent rounds of TP audits, especially joint audits with Customs Authorities. There are other related noteworthy developments such as the Labuan CbCR rules and the introduction of filing fees for APA; further changes are also expected in the TP audit procedures in the near future. With all these new changes in the TP landscape of Malaysia, it is critical for taxpayers to assess the impacts of these changes on their business. This will help to defend against any potential challenges which could be posed to the taxpayers during TP audits.

Through this seminar, we will share with you the implications of these developments, especially on the critical issues/items to be dealt with during audit and how to successfully manage them.

Key highlights

- Recent changes in Malaysia TP regulations and how to prepare robust TP documentation to defend against scrutiny
- Emerging issues based on recent TP audit experience and effective ways to manage them

The seminar will be conducted in both English and Japanese.

Agenda

Time	Event
2.00 p.m.	Registration
2.30 p.m.	Key changes in Transfer Pricing regulations: <ul style="list-style-type: none">• New changes in compliance requirements and administrative aspects;• Revised contents of transfer pricing documentation; and• Effective ways to prepare robust Transfer Pricing documentation
3.30 p.m.	Coffee break
4.00 p.m.	Recent experience from Transfer Pricing audits
5.00 p.m.	End

Deloitte speakers



Tan Wei Chuan
Transfer Pricing Director

Wei Chuan is a Director of Deloitte Malaysia's tax practice, based in our Penang office.

With over 15 years of tax experiences in Malaysia, he has extensive experience in corporation compliance matters, tax planning, tax due diligence, tax audit, transfer pricing and indirect taxes including GST implementation. He has also advised on personal tax planning and compliance matters as well as immigration solutions for international assignees under Global Employer Services (GES) service line. Currently, he is heading the transfer pricing service line of Penang office.

Wei Chuan graduated with a Bachelor of Commerce from La Trobe University, Melbourne, Australia. He is a chartered accountant of the Malaysian Institute of Accountants (MIA), a member of the CPA Australia and also a member of the Chartered Tax Institute of Malaysia (CTIM).



Hiroyuki Akimoto
Japanese Service Group Senior Manager

Hiroyuki Akimoto has been with the Deloitte Malaysia Japanese Service Group for almost 18 years. He serves Japanese companies of various industries and has established his experience mainly in the area of expatriate and corporate tax compliance, tax incentives, cross border transactions and tax planning. He is also familiar with company incorporation, company secretarial and legal matters, immigration and work permits, and company liquidation.

Hiroyuki Akimoto is a writer for several books and publications on Malaysian tax and investment, and a speaker at seminars organised in Malaysia to update on Malaysian tax development.

Registration

When and where

Date: Thursday, 22 March 2018
Time: 1.30 p.m. - 4.30 p.m.
Venue: The Springboard
Deloitte Tax Services Sdn Bhd
Level 12B Hunza Tower
163E Jalan Kelawei
10250 Penang

To register / enquire

Contact person: Ms. Teh Guat Gnoh / Ms. Aruldass Sagayamary
Email: gteh@deloitte.com / saruldass@deloitte.com
Contact: +604 2189273 / +604 2189888 (Ext 3308)

Registration details

- Registration closing date is Monday, 19 March 2018
- Seats are complimentary and reserved on a first-come-first-served basis.

Disclaimer

The organiser reserves the right to cancel and/or make changes to the programme, venue, speaker(s)/ facilitator(s) and/or topic(s) if warranted by circumstances beyond its control.

Registration form

Participant 1

Name (Mr / Mrs / Ms)

Designation

Email

Mobile phone no.

Participant 2

Name (Mr / Mrs / Ms)

Designation

Email

Mobile phone no.

Participating company details

Company name and business registration number

Address

Phone no.

Fax

Contact person

Email

Deloitte.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited, a UK private company limited by guarantee (“DTTL”), its network of member firms, and their related entities. DTTL and each of its member firms are legally separate and independent entities. DTTL (also referred to as “Deloitte Global”) does not provide services to clients. Please see www.deloitte.com/my/about to learn more about our global network of member firms.

Deloitte provides audit, consulting, financial advisory, risk advisory, tax and related services to public and private clients spanning multiple industries. Deloitte serves four out of five Fortune Global 500® companies through a globally connected network of member firms in more than 150 countries and territories bringing world-class capabilities, insights, and high-quality service to address clients’ most complex business challenges. To learn more about how Deloitte’s approximately 264,000 professionals make an impact that matters, please connect with us on Facebook, LinkedIn, or Twitter.

About Deloitte Southeast Asia

Deloitte Southeast Asia Ltd – a member firm of Deloitte Touche Tohmatsu Limited comprising Deloitte practices operating in Brunei, Cambodia, Guam, Indonesia, Lao PDR, Malaysia, Myanmar, Philippines, Singapore, Thailand and Vietnam – was established to deliver measurable value to the particular demands of increasingly intra-regional and fast growing companies and enterprises.

Comprising 330 partners and over 8,000 professionals in 25 office locations, the subsidiaries and affiliates of Deloitte Southeast Asia Ltd combine their technical expertise and deep industry knowledge to deliver consistent high quality services to companies in the region.

All services are provided through the individual country practices, their subsidiaries and affiliates which are separate and independent legal entities.

About Deloitte in Malaysia

In Malaysia, services are provided by Deloitte Tax Services Sdn Bhd and its affiliates.

