

Transfer pricing: return filing compliance & Latest updates on business tax audit Gearing up for 2016



Venue: Ramada Plaza Melaka
Time: 8:00 a.m. - 1:00 p.m.
Date: 28 June 2016 (Tuesday)
Registration closing date: 22 June 2016 (Wednesday)

Transfer pricing: Return filing compliance

Objective

Malaysian taxpayers are required to prepare contemporaneous Transfer Pricing (TP) documentation by the filing deadline and disclose adherence to this requirement in their Form C return. In short, the taxpayers would need to have a TP documentation in place before the filing deadline in order to be able to check "YES" to Item R4 in Form C. This annual exercise focuses on transactions with related parties and their arm's length character. Failure to prepare TP report may expose the taxpayer to an audit, and may lead to higher penalties on additional assessment.

We at Deloitte understand the significant of this requirement and the challenges facing taxpayers, a special session is brought to you by our Deloitte TP Services Group to reflect on the following:

- TP compliance essentials for return filing: key considerations and allied issues; and
- 2015 review: our TP audit experience – dispute resolution and appeal process.

Latest Updates on Business Tax Audit

Objective

The Malaysian Inland Revenue Board ("IRB") has recently announced that there will be a waiver and remission of tax penalty to encourage voluntary disclosures and early settlement of tax arrears.

The topics that we intend to cover include:-

- Operational Guidelines No. 1/2016-
 - Opportunity to resolve tax disputes
 - Waiver of tax increase (late payment penalty) for tax arrears: Income tax, withholding tax and Real Property Gains Tax (RPGT)
 - Remission of penalty for voluntary disclosure of non-submission or late filing of income tax return forms
 - Remission of penalty for voluntary disclosure of incorrect returns filed
- Voluntary Disclosures / Tax Audit Framework dated 1 February 2015
- A&I Landmark Cases

Who should attend

The programme is designed for company directors, CFOs, Financial controllers, Finance / Tax managers, accountants, Heads of Human Resources, Human Resource Managers etc.

Agenda	Time
Registration	8:00 a.m.
Introduction and latest update on TP TP compliance essentials for return filing <ul style="list-style-type: none">• Key considerations and allied issues	8:30 a.m.
Our audit experience <ul style="list-style-type: none">• dispute resolution and appeal process	
Tea break and networking	10:15 a.m.
<ul style="list-style-type: none">• Latest update on business tax audit<ul style="list-style-type: none">– Reduction of Penalty and Waiver of Increase in Tax for settlement of Tax Arrears<ul style="list-style-type: none">» Operational Guidelines No. 1/2016: Offer to reduce penalty and waive tax increase» Voluntary Disclosures / Tax Audit Framework dated 1 February 2015» A&I Landmark Cases	10:45 a.m.
Q & A Session	12:30 p.m.
End of session	1:00 p.m.

Our speakers



Theresa Goh

**Tax Partner and National Transfer Pricing Leader
Deloitte Malaysia**

Theresa has over 25 years' experience in tax, and currently leads the national TP practice. She was instrumental in shaping Malaysia's first three advance pricing arrangements. Her expertise in transfer pricing has garnered a slew of international recognitions.

Under Theresa's leadership, the team was recognized as the Malaysia Transfer Pricing Firm of the Year at the 2016 ITR Asia Tax Awards, and as TP Law Firm of the Year - Malaysia by Lawyer Legal Award 2015. She also led Deloitte Malaysia won the first ever Malaysia Transfer Pricing Firm of the Year award bestowed by International Tax Review, and has achieved consistent Tier 1 ranking in the World Transfer Pricing Guide published by International Tax Review.

Theresa was voted as Malaysia Tax Controversy Leader by International Tax Review 2013/2014 and 2015, and has been recognized as one of the World's Leading Transfer Pricing Advisers by Euromoney, consistently since 2009. She was also voted as a Leading Tax Adviser by International Tax Review in 2008/2009, and as a Leading Female Practitioner in International Tax/Transfer Pricing in the Legal Media Group's 2012 Guide to the World's Leading Women in Business Law.



Chow Kuo Seng

**Executive Director, Audit & Investigation, Business Tax
Deloitte Malaysia**

Chow Kuo Seng is the Business Tax Audit & Investigation (A&I) Leader at Deloitte Malaysia's tax practice with more than 30 years' experience.

His experience in A&I controversy management includes providing tax advisory/consultancy and managing compliance work for local and multinational companies as well as high net-worth individual clients.

Chow's profound engagement with the clients and the tax authorities has yielded exceptional resolutions, resulting in positive settlements and amicable closure of tax disputes. He was awarded the Malaysian Tax Controversy Leader in the International Tax Review 2015.

Chow is a Chartered Accountant and a licensed tax agent and has also passed the GST Examination conducted by the Royal Malaysian Customs Department.

Our speakers



Yohan Francis Xavier

**Associate Director
Deloitte Malaysia**

Yohan has an experience of more than 8 years in assisting local clients with transfer pricing documentation, planning and audit defence. His experience spans across industries and functions, from manufacturing and distribution to services, in FMCG, IT & ITES, technology related products, branded apparel, lifestyle goods, food & beverages, and oil & gas. Yohan has been part of the core engagement team for some of the most valued clients of Deloitte Malaysia.

Prior to moving into transfer pricing, Yohan was involved in tax audit and investigation and tax compliance for more than 5 years.



Wong Yu Sann

**Senior Tax Manager, Audit & Investigation, Business Tax
Deloitte Malaysia**

Yu Sann is a Senior Tax Manager of Deloitte Malaysia's tax practice and has 10 years of professional experience. In addition to individual clients and Labuan companies he also has experience in servicing corporate companies in a range of industries which include banking, insurance, manufacturing, property development, construction, trading, services and investment holding etc.

Yu Sann has been involved in various assignments such as tax audit defense and prudential tax audit, back-duty tax investigations, tax appeal, application of tax incentives and corporate tax efficiency review.

Yu Sann is an affiliate of Association of Chartered Certified Accountants, Chartered Tax Institute of Malaysia and Malaysian Institute of Accountants.

Registration

When & where

Date: 28 June 2016
Time: 8:00 a.m. - 1:00 p.m.
Venue: Ramada Plaza Melaka
Jalan Bendahara,
75100, Melaka

Registration closing date

- No later than 22 June 2016
- No refund for cancellation after 22 June 2016
- No extra charge for substitute delegates

Seminar fee

- RM106 (inclusive of GST) per delegate

Note: Seats are limited and guaranteed only upon receipt of payment.
Fees include seminar material and lunch.
Tax invoice will be issued under the name of participant company.

Payment

Company name: Deloitte Tax Services Sdn Bhd
Bank: United Overseas Bank
(Malaysia) Berhad
Bank address: 1, Jalan SS21/58, Ground Floor,
Uptown 1, Damansara Uptown,
47400, Petaling Jaya, Selangor
Swift code: UOVBMKYL
Account: 202-301-9827

Crossed cheque and bank draft made payable to:
Deloitte Tax Services Sdn Bhd

All payments must be received by 22 June 2016

Registration & enquiry

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75000 Melaka

Participant 1

Name (Mr / Mrs / Ms) **this name will be presented in the attendance certificate*

Designation

Email

Vegetarian Yes No

Participant 2

Name (Mr / Mrs / Ms) **this name will be presented in the attendance certificate*

Designation

Email

Vegetarian Yes No

Participant company details

Company

Address

Tel

Fax

Contact person

Email

Cheque / draft no. for RM

Date

Name

* Please photocopy registration form for 3rd and subsequent participants.

** Limited seats, register early to avoid disappointment

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