

Rerun - Back by popular demand

## OECD/G20 Base Erosion and Profit Shifting Project – Why it matters to you



Date : Monday, 14 December 2015

Time: 8:30 a.m. – 1:30 p.m.

Venue : Deloitte (KL office)

Meet Point 1 & 2

Level 15 Menara LGB

Brought to you by Deloitte Tax Academy, a division of Deloitte Tax Services Sdn Bhd  
(an approved training provider by HRDF).

# Overview

## Key Takeaways

What exactly is base erosion and profit shifting (BEPS)? Does BEPS really matter to Malaysian corporates? BEPS simply means a strategy used by MNCs to achieve global tax efficiencies by taking advantage of the differences in taxation systems and treatment of income / expenses in different jurisdictions. Whilst international tax planning is not illegal, the tax authorities around the globe are certainly not prepared to lose their fair share of tax collection. In 2012, the G20 commissioned the OECD to look into this matter.

Whilst Malaysia is neither a member of OECD nor G20, the Malaysian authorities are following the BEPS developments closely and indeed, have participated in the Regional Network meetings on BEPS project. Malaysia is an official “observer” at the BEPS project. A first round of meetings was organized on 12-13 February 2015 in Seoul in which 61 countries and jurisdictions participated, including Malaysia.

On 5 October 2015, the OECD Secretariat published 13 final reports and an explanatory statement outlining consensus actions under the BEPS project. As expected, the G20 finance ministers endorsed the final package of measures for a comprehensive, coherent and coordinated reform of the international tax rules during a meeting on 8 October, in Lima, Peru.

Time and tide wait for no man. If you have not considered BEPS aspects for your outbound investment, it is time to do so. We expect that the present Malaysian tax treaties and probably, domestic tax law to be revisited in the near future in light of BEPS development. In addition, Malaysian corporates investing overseas will be impacted by BEPS changes in countries in which they invest, irrespective of measures adopted by Malaysia.

In this workshop, we will discuss some of the key BEPS areas that Malaysian corporates should be focusing on including:

- Sustainability of international holding and financing structures
- Continued reliance on tax treaties
- Increased permanent establishment / taxable presence risks
- Increased transfer pricing and documentation requirements/country-by-country reporting
- Impact of BEPS project on the business supply chain
- Impact of BEPS project on cross-border financing

If you would like to gain a better understanding of the BEPS issues affecting you and get to know our cross-border tax specialists, you are cordially invited to register for this upcoming workshop.

Agenda	
8:30 a.m. – 9:00 a.m.	Registration & Refreshment
9:00 a.m. – 11:00 a.m.	Workshop session
11:00 a.m. – 11:15 a.m.	Coffee Break
11:15 a.m. – 1:15 p.m.	Workshop session
1:15 p.m.	Tax clinic session

# Speakers' profiles



## **Tan Hooi Beng**

### **International Tax Leader**

Hooi Beng is international tax leader of Deloitte Malaysia. He is based in Kuala Lumpur and has more than 16 years of experience in corporate and international tax. He has vast experience in advising multinational corporations, fund managers and private equity firms on corporate structuring and restructuring, fund management, mergers and acquisitions, tax-efficient financing, international offshore financial centres, business model optimization, tax treaties and cross-border taxation generally.

Hooi Beng is an Associate Member of the Chartered Tax Institute of Malaysia (CTIM), a Chartered Accountant of the Malaysian Institute of Accountants (MIA) as well as a licensed tax agent under the Malaysian Income Tax Act, 1967. He holds a Bachelor of Accounting from the University of Malaya.



## **Theresa Goh**

### **Transfer Pricing Leader**

Theresa is the National Transfer Pricing Leader of Deloitte Malaysia, which is an integral part of the larger Deloitte network that has consistently been recognized as the Number 1 Global Transfer Pricing Team by Euromoney. Based in Kuala Lumpur, her experience covers transfer pricing and tax audits, investigations and tax planning/ advisory work for clients in a wide range of industries, including manufacturing, services, and the oil and gas sectors. She has more than 25 years' experience, encompassing several facets of tax and transfer pricing matters. She has extensive experience in successfully completing many tax planning and consulting assignments in areas such as restructuring, and mergers and acquisitions.

Theresa was voted as a Leading Tax Adviser by International Tax Review in 2008/2009, 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 Female Practitioner in International Tax/Transfer Pricing in the Legal Media Group's 2012 Guide to the World's Leading Women in Business Law, and as Malaysia Tax Controversy Leader by International Tax Review 2013/2014. Under her leadership, 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. Recently, the team has been recognized as TP Law Firm of the Year - Malaysia by Lawyer Legal Award 2015.

Theresa is a Council Member of both the Malaysian Institute of Certified Public Accountants and the Chartered Tax Institute of Malaysia. She is the Chairperson of MICPA's Membership Affairs committee, and a member of its Tax and Examination committees, and has participated in several operational dialogue with the Inland Revenue Board of Malaysia. Theresa is a Certified Public Accountant (Malaysia) and a Chartered Accountant. She is an approved tax agent under the Malaysian Income Tax Act, 1967. She has presented an APA paper in Tokyo jointly with the Inland Revenue Board of Malaysia.



### **Hisham Halim**

#### **Transfer Pricing Executive Director**

Hisham has over 18 years of experience, previously based in the United Kingdom and Australia, and a 3 year stint in a global energy resource MNC, specializing in transfer pricing. In his initial years upon his return to Malaysia in 2009 with a government linked investment company, Hisham focused on driving and implementing several national level strategic initiatives.

At present, Hisham's expertise in transfer pricing includes transfer pricing documentation, planning and audits in MNCs and across industries in particular energy and resources. His forte also extends into supply chain, business model optimisation and organisational transformation.



### **Ben Pickford**

#### **International Tax Director**

Ben is a Director in the International Tax group in our Southeast Asia practice having relocated from London with effect from June 2013. Ben has over 13 years of international tax experience, having also worked in Deloitte's New York office.

Ben's role focuses on providing international tax advice to multinational groups investing into or through Southeast Asia, acting as a valuable link between our UK and Southeast Asia practices in particular. In addition, Ben can provide 'real time' advice to Southeast Asian investors looking to invest into or through the UK. Through his time spent working on different continents, Ben has a wide range of experience in advising multinational groups in a broad range of industries on their international tax issues.

Ben has a First Class Honours degree from the University of Birmingham and is a UK Chartered Tax Advisor and UK Chartered Accountant.

# Registration

## When & where

Date: 14 December 2015 (Monday)  
Time: 8:30 am - 1:30 pm  
Venue: Deloitte (KL office)  
Meet Point 1 & 2  
Level 15 Menara LGB

## Registration

No later than 7 December 2015

## RSVP

This is a complimentary event. In view of the limited seats, we extend this invitation to accommodate participants on a first-come first-served basis.

## Registration and enquiries

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For any enquiry in relation to international tax matters, please contact:  
Tan Hooi Beng at +603 7610 8843 or alternatively, email him at hooitan@deloitte.com

### Participant 1

Name (Mr / Mrs / Ms)

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Designation

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Email

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### Participant 2

Name (Mr / Mrs / Ms)

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Designation

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Email

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### Participant company details

Company name & business registration number

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Address

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Tel

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Fax

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Contact person

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Email

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Date

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