Deloitte International Tax Symposium 2018
Navigating the new landscape confidently

Thursday, 3 May 2018
9.00 a.m. – 5.30 p.m.

One World Hotel,
First Avenue,
Bandar Utama City Centre,
47800 Petaling Jaya,
Selangor
Overview

The anti-Base Erosion and Profit Shifting ("BEPS") measures introduced by the Organisation for Economic Co-operation and Development ("OECD") constitute the most significant international tax reform in recent years.

Recently, Malaysia has signed the Multilateral Convention ("MLI") to implement tax treaty-related measures to prevent BEPS. Given this, it is vital for CFOs and in-house tax specialists to fully understand the impact of the anti-BEPS measures and MLI on their groups' operations, financing and holding structures as well as the transfer pricing position.

Join us for an intensive one-day symposium that is designed to provide you with an understanding on the key anti-BEPS measures and transfer pricing issues so that you are prepared to navigate through the changing landscape of international tax.

Key highlights
• What is MLI and how does it impact us?
• Why is it crucial to differentiate between royalty and service fee?
• Managing transfer pricing and dispute resolution in the post-BEPS era
• Preparing for Earning Stripping Rules
• Managing PE risk and understanding anti-treaty shopping rules
• Other issues in vogue: Substance, digital economy and U.S. tax reform

One-on-one clinic consultations
Individual consultation sessions will also be available in the following areas. Kindly indicate your interest in the online registration form:
• Automotive
• Business process solution (BPS) / Outsourcing
• Business tax
• Capital allowances maximisation
• Cross-border transactions / Mergers and acquisitions
• Financial services
• Global employer services (GES) / Personal tax
• Government grants and tax incentives
• Indirect tax
• Oil and gas
• Private wealth services
• Real estate
• Tax audit and investigation
• Telecommunication
• Transfer pricing
## Agenda

<table>
<thead>
<tr>
<th>Time</th>
<th>Topic</th>
<th>Speaker(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.00 a.m.</td>
<td>Welcome and opening remarks</td>
<td>Sim Kwang Gek (Mergers &amp; Acquisitions Tax Leader, Deloitte Malaysia)</td>
</tr>
<tr>
<td>9.10 a.m.</td>
<td>Royalty v Service fee – Why is it crucial to differentiate?</td>
<td>Tan Hooi Beng (International Tax Leader, Deloitte Malaysia)</td>
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<td>9.10 a.m.</td>
<td></td>
<td>Tan Chia Woon (Senior Manager, Deloitte Malaysia)</td>
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<td>10.00 a.m.</td>
<td>Q&amp;A</td>
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<tr>
<td>10.10 a.m.</td>
<td>Signing of MLI – What does this really mean?</td>
<td>Puan Nooriah Mohd Mainuri (Deputy Director - Regulation &amp; Treaty International Tax Department, Inland Revenue Board of Malaysia)</td>
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<tr>
<td>11.00 a.m.</td>
<td>Q&amp;A</td>
<td></td>
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<tr>
<td>11.30 a.m.</td>
<td>Transfer pricing in the post-BEPS era</td>
<td>Moderator Theresa Goh (Transfer Pricing Leader, Deloitte Malaysia)</td>
</tr>
<tr>
<td>11.30 a.m.</td>
<td>• TP audit – key areas of scrutiny, expectations and gaps</td>
<td>Panellists Wong Yoke Lin (Head of Tax, PureCircle Group)</td>
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<td>• Dispute resolution and appeals – the evolving landscape</td>
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<td>• Earning Stripping Rules – getting ready</td>
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<tr>
<td>12.45 p.m.</td>
<td>Q&amp;A</td>
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<tr>
<td>1.00 p.m.</td>
<td>Networking lunch</td>
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<tr>
<td>2.00 p.m.</td>
<td>Sustaining the post-BEPS era</td>
<td>Moderator Subhabrata Dasgupta (Transfer Pricing Partner, Deloitte Malaysia)</td>
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<td>• Issue of substance – how much is enough?</td>
<td>Panellists Puan Nazariah Abdul Karim (Deputy Director - Business and Tax Development Unit, Labuan Financial Services Authority)</td>
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<td>• Need to revisit existing business models</td>
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<td>• Tax challenges of digital economy</td>
<td>K. Sandra Segaran (General Manager Group Tax, Petronas)</td>
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<td>3.15 p.m.</td>
<td>Q&amp;A</td>
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<tr>
<td>3.30 p.m.</td>
<td>Tea break</td>
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<tr>
<td>3.45 p.m.</td>
<td>BEPS Action 7 - Permanent Establishment – The past, the present and the future</td>
<td>Tan Hooi Beng (International Tax Leader, Deloitte Malaysia)</td>
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<td>BEPS Action 6 – Is it the end of treaty shopping?</td>
<td>Kelvin Yee (Senior Manager, Deloitte Malaysia)</td>
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<td>4.50 p.m.</td>
<td>Q&amp;A</td>
<td></td>
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<tr>
<td>5.00 p.m.</td>
<td>Clinic session</td>
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<tr>
<td>5.30 p.m.</td>
<td>End of symposium</td>
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Guest speakers

**Puan Kok Choy Har**  
**Director - Field Audit On Services Sector Unit, Multinational Tax Branch, Inland Revenue Board of Malaysia**  
Puan Kok has worked in various departments and branches in the Inland Revenue Board of Malaysia before joining the transfer pricing unit in late 2007. She has also conducted transfer pricing trainings and workshops and participated in the WP6 meeting at the Organisation for Economic Co-operation and Development (OECD). Puan Kok graduated from University of Malaya (UM) in 1984.

**Puan Nooriah Mohd Mainuri**  
**Deputy Director - Regulation & Treaty International Tax Department, Inland Revenue Board of Malaysia**  
Puan Nooriah joined the Inland Revenue Board of Malaysia in 1999 and has served various offices, namely the Cheras Branch, Petaling Jaya Investigation Branch and the Malaysian Tax Academy. Currently, she is attached to the Department of International Taxation in the International Regulation and Treaty Division. She holds a Bachelor’s degree in Law (LL.B) from the International Islamic University, Malaysia and Masters of Laws (LL.M) degree from Universiti Kebangsaan Malaysia.

**Puan Nazariah Abdul Karim**  
**Deputy Director – Business and Tax Development Unit, Labuan Financial Services Authority**  
Prior to joining Labuan Financial Services Authority, Puan Nazariah worked in a Big Four accounting firm as well as in large Malaysian conglomerates. She has extensive experience in local and international taxation. She is also a member of the Chartered Tax Institute of Malaysia (CTIM) as well as the Malaysian Institute of Accountants (MIA).

**Wong Yoke Lin**  
**Head of Tax, PureCircle Group**  
Yoke Lin has more than 20 years of tax experience. Currently, she leads the tax division of PureCircle Group. Prior to joining PureCircle Group, she headed the tax departments of a listed Malaysian group and a subsidiary of a UK-listed company. She also worked with a Big Four and international mid-tier firms where she gained extensive experience from servicing clients from large corporate conglomerates and multinationals in a wide spectrum of industries.

**K. Sandra Segaran**  
**General Manager (Group Tax), Petronas**  
Prior to joining Petronas, Segaran was an Executive Director in a Big 4 accounting firm in Malaysia where he served 8 years, including a stint of 3 years as head of the International Tax Services group. He started his career in taxation in the Inland Revenue Board of Malaysia where he served 22 years. He is a council member of the CTIM since 2011. He served as head of the Editorial Committee and editor of Tax Guardian for 3 years before being appointed as the current head of the Examinations & Education Committee. Segaran is also a trustee of the Malaysian Tax Research Foundation. He is also a regular speaker in CTIM and public seminars on various tax topics.
Deloitte speakers

**Sim Kwang Gek**  
**Mergers & Acquisitions Tax Leader, Deloitte Malaysia**  
Kwang Gek has more than 20 years of experience in providing tax and business consulting services for local and multi-national corporations in the manufacturing, construction, engineering, property development, retail, entertainment, renewable energy, information technology and services industry. She leads the M&A tax practice in Malaysia.

**Tan Hooi Beng**  
**International Tax Leader, Deloitte Malaysia**  
Hooi Beng is the leader of the international tax services group. He has more than 19 years of experience in cross-border taxation and has vast experience in advising multinational corporations on corporate structuring and restructuring, mergers and acquisitions, international offshore financial centres, business model optimisation, tax treaties and cross-border taxation generally.

**Theresa Goh**  
**Transfer Pricing Leader, Deloitte Malaysia**  
Theresa has been involved in transfer pricing audit, compliance and planning/advisory work for clients from a wide range of industries. Under Theresa’s leadership, Deloitte Malaysia won the Malaysia Transfer Pricing Firm of the Year at the 2016 ITR Asia Tax Awards. The team has achieved consistent Tier 1 ranking in the World Transfer Pricing Guide published by International Tax Review. Theresa has been recognised as one of the World’s Leading Transfer Pricing Advisers by Euromoney, consistently since 2009 – 2015/2017. She has been voted as Malaysia Tax Controversy Leader by International Tax Review for four consecutive years 2013-2017, and has been featured in its Women in Tax Leaders Guide since inception in 2015. Theresa also received the Transfer Pricing Lawyer of the Year – Malaysia award from Lawyer Monthly Legal Awards 2016/2017.

**Leonard Khaw**  
**Asia Pacific International Core of Excellence Leader, Deloitte**  
Leonard is an international and M&A tax partner based in Hong Kong, and the Co-leader of Deloitte’s Asia Pacific International Core of Excellence (AP ICE), a group of senior tax professionals that provides international tax services to Asia Pacific-based companies investing abroad, as well as multinational companies investing in the region. Leonard has more than 37 years’ experience as a practicing tax professional in Australia, China, Hong Kong, Indonesia and the UK.
Subhabrata Dasgupta  
**Transfer Pricing Partner, Deloitte Malaysia**  
Subha has more than 10 years of experience in serving clients from varied industries and has extensive experience working for Deloitte network offices in Asia, the EMEA and the Americas on global and regional transfer pricing documentation and planning engagements. Currently, he is leading the TP Technology and the FSI offerings from Deloitte in Malaysia.

Philip Yeoh  
**Transfer Pricing Partner, Deloitte Malaysia**  
Philip has more than 18 years of experience in the areas of tax advisory, tax compliance and transfer pricing. He has extensive experience in executing transfer pricing assignments on behalf of FTSE 100 and Fortune 500 companies, comprising both locally headquartered as well as foreign multinational corporations. These projects include preparation of large scale transfer pricing documentation projects, settlement of transfer pricing disputes and supply chain planning and implementation projects.

Kelvin Yee  
**Senior Manager, Deloitte Malaysia**  
Kelvin Yee has more than 10 years of experience in cross-border taxation. He often advises multinational clients on various cross-border tax matters including BEPS. He has been involved in various group restructuring, tax due diligence, group tax review, incentive / tax relief application and initial public offering exercises.

Tan Chia Woon  
**Senior Manager, Deloitte Malaysia**  
Chia Woon is a core member of the international tax services group. She has advised large local and multinational clients on complex tax engagements in areas including IPOs, cross-border corporate reconstruction, privatisation and joint-ventures.
Registration

When and where
Date: Thursday, 3 May 2018
Time: 9.00 a.m. – 5.30 p.m.
Venue: One World Hotel
First Avenue,
Bandar Utama City Centre,
One World Hotel,
47800 Petaling Jaya,
Selangor

To register / To enquire
Name: James Cheang
Email: wcheang@deloitte.com
Contact: +603 7610 7952

Name: Thiban Raj
Email: tarumugam@deloitte.com
Contact: +603 7610 8159

Registration details
• Registration closing date is 26 April 2018
• Registration fees are RM350 per delegate and are inclusive of 6% GST
• Payment is non-refundable
• No extra charge for substitute delegates
• Seats are guaranteed only upon receipt of full payment by 26 April 2018
• A valid tax invoice will be issued in the name of participating entities

Payment details
Company name: Deloitte Tax Services Sdn Bhd
Bank: United Overseas Bank (Malaysia) Berhad
Swift code: UOVBMYKL
Account: 202-301-9827
Crossed cheque or bank draft payable to: Deloitte Tax Services Sdn Bhd

Materials
Softcopies of the presentation slides will be emailed to participants 3 days before the symposium. No hardcopies will be distributed.

One-to-one clinic consultations
Please indicate if you would like to reserve a slot in the online registration form. Your request will be confirmed via a separate emailer.

HRDF: Application to Human Resources Development Berhad (HRDB) for SBL assistance must be submitted before the commencement of the seminar. Completed forms are to be submitted online at www.hrdf.com.my.

CPE points: Certificate of attendance will be issued for CPE verification.

*Company’s eligibility for SBL assistance is subject to HRDF’s approval. This symposium is HRDF-compliant.

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