

Course Introduction

This course provides an in-depth understanding of transfer pricing (TP) fundamentals, with a focus on recent regulatory updates, including the TP Rules 2023, TP Guidelines 2024, and TP Tax Audit Framework 2024. Participants will gain insights into compliance requirements for management services, key audit areas, and real-life audit experiences through case studies. Additionally, the course will cover cost allocation mechanisms and Low-Value Adding Services (LVAS), addressing frequently asked questions (FAQs) and concluding with an interactive Q&A session.

Course outline

Module 1: Introduction to TP Fundamentals

- Overview of TP in Malaysian landscape
- Arm's length principles and TP documentation obligation

Module 2: Latest TP Regulatory Updates

- Key changes in TP Rules 2023
- Updates in TP Guidelines 2024
- TP Tax Audit Framework 2024

Module 3: Compliance Requirements for Management Services

- Intra-group management services
- Appropriate cost allocation mechanisms and overview of LVAS
- Content of TP documentation
- Common compliance pitfalls

Module 4: TP Audits - Key Focus Areas & Case Studies

- Key audit risks and red flags in TP audits
- Common disputes and case studies
- Best practices for mitigating TP risks

Course Objectives

The objective of the workshop is to equip nonfinancial professionals with financial awareness to enable better short- and long-term decision making in managing their businesses.

- Knowledge of accounting principles and practices
- Skills in analysis and problem-solving
- Ability to process financial data

Learning Outcome

By the end of the session, the participants will be able to:

- a) Stay updated on the latest developments, with a focus on intra-group services
- b) Understand the appropriate cost allocation mechanisms and the treatment of LVAS under TP regulations
- Recognize key audit focus areas, analyse realworld case studies and implement best practices to mitigate TP risks

Target Audience

This workshop is designed for, Chief Financial Officers, Finance Managers, Heads of Tax (HOTs), Tax Managers and other professionals involved in finance and taxations

Methodology

- Interactive Lectures & Presentations
 Covering key TP concepts and regulatory updates
- Case Studies & Practical Examples
 Analyzing real-life TP audits
- FAQ Discussion & Q&A Session
 Addressing participants' concerns in a structured format

About the Trainer: MR IVAN GOH

Ivan is a Tax Executive Director with KPMG Tax Services and has more than many working experiences including preparation of transfer pricing documentation, transfer pricing planning/advisory,transfer pricing due diligence review, formulating defense strategy in resolving transfer pricing dispute cases as well as handling of Country-by-country Reporting (CBCR). He also assists his firm in training program in transfer pricing.

His clients come from a diverse range of industries such as manufacturing and trading/distribution of consumer products, electronics, industrial products, chemicals, commodities, tobacco, state owned corporations and various types of service providers. His corporate tax compliance experience include managing a diversified portfolio of clients including multinational companies in a wide range of industry including fast moving consumer good, property development, industrial product, financial institutions and other services related industry.

Ivan has also participated in assignments covering other tax related areas such as rendering advice on various tax issues on cross border transactions and group restructuring projects, performed tax due diligence review, tax health-check review and capital allowance study on shopping centres. Ivan has assisted in the writing of articles for local and international publications. He has conducted external training workshops and spoken at local seminars.

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Attention: Ms Aiswarya AshIn

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