



Transfer Pricing Fundamentals and Tax Controversy

HRD Corp Claimable (SBL-Khas)

Effective 1 January 2021, new provisions relating to Transfer Pricing (TP) were introduced in the Income Tax Act, 1967 imposing a more stringent compliance requirement and imposing a hefty penalty for failure to furnish contemporaneous TP documentation (TPD) within 14 days upon the IRB's request will be liable to a penalty of RM20,000 to RM100,000 per company per year of assessment (YA). For companies seeking to prepare their own in-house TPD, it is important to note that TP documentation that is not prepared in accordance with the Malaysian TP guidelines will be rejected by the IRB and the non-compliance TP penalty will still be imposed. In addition, incorrect information disclosed in the in-house TPD may result in serious consequences of exposing a company to potential tax audit risks.

In this workshop, we will provide you a step-by-step guidance on how to prepare a minimum TPD which is in compliance with the Malaysian TP guidelines in order to avoid the non-compliance TP penalty.

Course Requirement

- Stable Internet Connection
- Webcam and Earphones

Course Content

Topic 1: Latest Update: Transfer Pricing – New Transfer Pricing Rules 2023

Topic 2: Transfer Pricing Flowchart issued by IRB: Latest Update

Topic 3: Full Transfer Pricing Documentation Report

Topic 4: Minimum Scope Transfer Pricing Reports and Transfer Pricing Policy

Topic 4: Impact of mandatory e-invoicing on Transfer Pricing in Malaysia

Topic 5: Transfer Pricing Litigation: Protecting Your Business in Disputes Inter-Company

- Sales and Purchases
- Intragroup Services
- Rent
- Intangibles
- Intragroup Financing

Topic 6: Common Mistakes in Preparing Transfer Pricing Report

Topic 7: Preparing a Défense-Ready Transfer Pricing (TP) Documentation

Topic 8: Current Tax Cases

When & Where	Who Should Attend	Training Investment
18 October 2024 (Friday) 9.00 am to 5.00 pm	Chief Financial Officers, Financial Controllers, Accountants, Auditors, Payroll & HR Personnel, Administrators, Company Secretaries, Tax Managers & Tax Consultants, Business Owners	RM 650 per participant (inclusive of Service Tax, Online Course Materials, E- Certificate of Attendance)
Remote Online Learning - Zoom		HRD Corp Claimable (SBL-Khas)

Trainer's Profile

Yong Mei Sim

Yong Mei Sim has served over 35 years in the Inland Revenue Board of Malaysia ("IRB") and held the last position as the Principal Assistant Director of the Penang branch, before retiring in 2016.

She obtained a Bachelor of Science Degree majoring in Economics with a Second Class Upper from the University Science of Malaysia in Penang. She was later awarded the prestigious JPA scholarship to pursue and successfully completed her Master's of Science in Taxation from the Golden Gate University in San Francisco, USA.

During her tenure in office, she has been, inter alia, an audit manager in charge of the Payroll Taxes Unit, Field Audit, and Desk Audit Unit. She had actively assisted the Federal Councils of the IRB in handling tax litigation cases. Among the

landmark tax litigation cases in which she was directly involved are ICTSB vs DGIR, PSSB vs DGIR, and Marigold (M) Sdn Bhd vs DGIR.

With her vast knowledge and experience in the field of Malaysian taxation, she has been invited by the IRB and other professional bodies to speak extensively around the country and to share her valuable experience and expertise on income tax updates and all other relevant taxation matters.

Testimonials

"In short, the overall training programme is outstanding & excellent. It really helps me a lot in carry out my tasks related to tax comp/tax file. I hope I can participate in similar training again." Mr. Lai, HR Executive

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Other Programmes [HERE](#)



Contact Us

Carriera Academy Sdn Bhd

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