Latest Updates on Malaysian Transfer Pricing: Practical Compliance, Audit Risks & Tax Disputes

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.

Objective

This workshop will provide participants with a practical understanding of the latest Malaysian transfer pricing developments, common IRB audit issues, and effective strategies to minimise transfer pricing adjustments, penalties and surcharge.

Pre-Requisites

- Stable Internet Connection
- Webcam and Earphones

Course Content

Topic 1: Latest developments in the Malaysia Transfer Pricing Guidelines 2024 and Transfer Pricing Rules 2023

Topic 2: Understanding Related-Party Transactions and the Arm's Length Principle

Topic 3: Transfer Pricing Documentation (Minimum & Full Scope) and Contemporaneous Documentation Requirements

Topic 4: New Form C / e-C Disclosure Requirements and Common Compliance Mistakes

Topic 5: Transfer Pricing Methods, Benchmarking and FAR Analysis

Topic 6: Transfer Pricing Treatment of Intra-Group Services, Loans, Financial Assistance and Business Restructuring

Topic 7: Impact of e-Invoicing on Transfer Pricing Audits and Documentation

Topic 8: IRB Transfer Pricing Audit Framework 2025 – Audit Process, Information Requests and Practical Defence Strategies

Topic 9: Transfer Pricing Surcharge, Documentation Penalties and How to Defend Audit Adjustments

Topic 10: Recent Malaysian Transfer Pricing Tax Cases and Practical Lessons for Taxpayers

Topic 11: Common Disputable Areas Identified by the IRB and Practical Risk Management Strategies

When & Where

23 October 2026
(Friday)
9.00 am to 5.00 pm

Remote Online Training – Zoom

Who Should Attend

Chief Financial Officers, Financial Controllers, Accountants, Auditors, Administrators, Company Secretaries, Tax Managers, Compliance Managers, Business Owners

Training Investment

RM 800 per participant
(inclusive of Service Tax, Online Course Materials, E-Certificate of Attendance)

🔥 **Group Promo: Save 15%**
Register min. 3 pax for
RM 680 per pax (Normal Rate: RM 800)

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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

Register HERE

Other Programmes HERE

Contact Us

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