

MINIMUM TRANSFER PRICING 2023 : GET YOUR PRACTICAL GUIDANCE TO ANALYSE, PREPARE AND WRITING THE COMPLETE MINIMUM TP DOCUMENTATION

Dr. Choong Kwai Fatt | 21 CPD |

HRDC Claimable* Course - SBL Khas | The Gardens Hotel, Mid Valley, KL |

13, 14 , 15 September 2023 (Wed, Thurs & Fri)

HRDC Approved No. Siri Kursus: 10001315104



MIN TP 2023

Terms and Conditions | Cancellation Policy: No refund will be made after payment is made. If the registered participant is unable to attend, a substitute delegate is allowed at no extra charge. However, should there be a request to change the name printed on the e-certificate of attendance to that other than that shown on the registration form, RM 100 extra will be charged as reprinting service charge. The organiser reserves the right to refuse service. The organiser reserves the right to change event date and venue, with notice being sent vide the email registered above. Information collected is in pursuant to the Personal Data Protection Act 2010. | ***HRDC Claimable :** is subject to approval by PSMB . | ****CPD :** Final CPD accepted by professional bodies vary and subject to each bodies' discretion. | Seats are confirmed on payment made and on first come first served basis only. You have fully understood the DISCLAIMER OF WARRANTIES AND LIMITATION OF LIABILITY stated in our Synergy TAS PLT website at <http://www.synergymas.com/disclaimer/>. You may not, without our prior written permission, frame or inline link any of the content of this brochure, or incorporate it into another website or other service any of our material, content or intellectual property. Copyright (C) 2023 Synergy TAS PLT.

MINIMUM TRANSFER PRICING DOCUMENTATION

*BUILD THE RIGHT UNDERSTANDING OF
TRANSFER PRICING WITH CONFIDENTLY WITH SYNERGY TAS!*

‘MINIMUM’ TRANSFER PRICING MANDATORY?

With effect from **YA 2023**, the **TP Doc** (be it minimum or full version) is **MANDATORY** required to be prepared prior to the submission of the tax return, Form C and to be dated and to be signed by the Director as to its Correctness and Accuracy. Failure to have the TP Doc prepared would amount to an Incorrect Return Submission. The responsibility in preparing the TP Doc lies on the Malaysia Income Reporting Company or Malaysia paying company to overseas related party on purchases or services received.



TEMPLATE FOR MINIMUM TRANSFER PRICING DOCUMENT

Hearing the Business Owners's gloomy and grumble over the extra compliance cost, the Inland Revenue Board (IRB) has published the Minimum TP Doc template in June 2023. The IRB's template would form the core basis in guiding the participants in analysing related companies' transactions, preparing pricing policy, writing to complete the minimum TP Doc.



CHALLENGING AREAS

Many Accountant is aware of the concept of transfer pricing is focus on the business dealings of related companies' transactions. The concept of "Arm's Length" is not new. The truly mind-boggling part is determining the **Pricing Policy**. What are the **functions performed**? Which **assets are employed**? What is the **level of risks** assumed in formulating the price transacted between related companies?



THRESHOLD FOR MINIMUM TRANSFER PRICING

Inland Revenue Board has set the parameter of business transactions of RM15 million (TP Doc 1), loan between related companies of RM50 million (TP Doc 2) would be the demarcation line in ascertaining whether full transfer pricing documentation (TP Doc) or minimum TP Doc to be prepared in "Every Year of Assessment". The Governing Law would be s 140A of the Income Tax Act 1967, Income Tax (Transfer Pricing) Rules 2023 [PU(A) 165/2023] and Transfer Pricing Guidelines 2012.



MUST-HAVE EVEN FOR THOSE WHO REVIEW TRANSFER PRICING DOCUMENTATION

Even if you do outsource some of the work, the input still needs to come from someone within the company - like you! Companies are now prone to shifting to decentralised structures, which can be tricky to navigate. Don't get left behind- as a decision maker or advisor, transfer pricing know-how is now a Must. So, brush up on your TP knowledge and keep your company compliant.



MINIMUM TRANSFER PRICING PRACTICAL APPLICATION

This is a 3-day workshop that strives to guide, coach and be hands-on for each participant in preparing and writing a minimum TP Doc version.

So many skills to Master before preparing Transfer Pricing Documentation!

“ WHILE OTHERS
STRUGGLE TO LEARN
LATEST UPDATES:
YOU ARE NOT ONLY
AWARE OF
TRANSFER PRICING,
YOU ALSO HAVE
THE RIGHT
TEMPLATE &
KNOWLEDGE
AT YOUR DISPOSAL

”

STAY AHEAD OF THE CROWD

SPEAKER'S PROFILE

DR CHOONG KWAI FATT is the Pioneer in Tax Formation, authority in terms of Tax Law and Implementation. He was appointed by the Ministry of Finance as one of the panel members to review tax reforms in Malaysia, inclusive of the formulation of GST.

He has conducted and published Extensive Researches on Malaysian Taxation way back since 2006. Dr Choong being an avid researcher, he has also studied Taxation System from various countries.

He is also widely known for his ability to formulate the "Unthinkable" Strategies and clearly thought of Implementation Plan. He is constantly sought by many listed companies as well as high net worth individual and SME for his Practical and Impressive Strategies to taxation and of course, his foresight into the potential tax concerns.

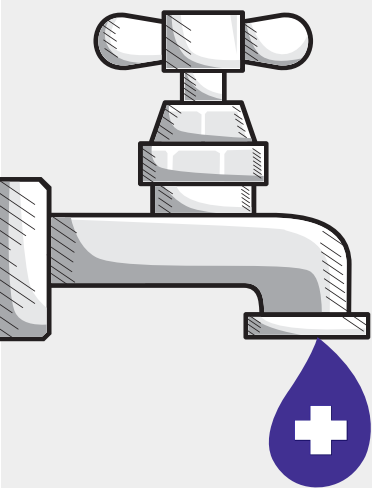
Being the expert of experts in terms of Taxation & Tax Planning, where he provided advice and personally trained corporate accountants and professional firms on Income Tax, RPGT, GST and SST Implementation. Get ready to take good notes when you attend his Minimum Transfer Pricing this year and get ready for all the comprehensively compiled seminar materials.

DR CHOONG KWAI FATT

B.Acc(Hons)(Malaya), LL.B(Hons)(London), CLP, MCL(IIUM), PhD(IIUM), FCCA(UK), CPA(M), CA(M), ACA(ICAEW), CA(Aust.), CPA(Aust.), CGA(Can), FCCS.

TAX CONSULTANT, ADVOCATE AND SOLICITOR (HIGH COURT OF MALAYA)





HOW THE SEMINAR IS CONDUCTED









- + Join us Now for this 3 days hands-on Transfer Pricing Seminar where we'll be breaking down based on industry the ins and outs to Analysis, Preparation Guidance and Writing Minimum Transfer Pricing to its Completion. Led by esteemed Tax Expert, Dr. Choong Kwai Fatt, this isn't your typical boring Tax Courses.
- + With real-life examples and up to date Latest Rule on Transfer Pricing, you'll walk away feeling confident to prepare or even review transfer pricing documentation. Giving effective advice when it come to related party transaction.
- + Plus, Dr. Choong will delve into specific documents you'll need to prepare as **Supporting Evidence for a rock-solid Transfer Pricing Documentation**. Don't miss out on this practical and informative Transfer Pricing to enhance your business success this Year!

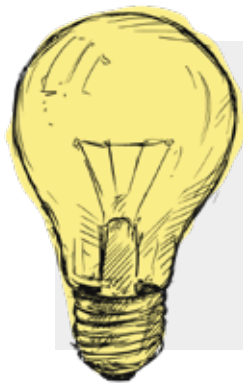
 = Hot topic



SO DON'T MISS OUT ON THIS AMAZING OPPORTUNITY TO LEVEL UP YOUR TRANSFER PRICING DOCUMENTATION!









DAY 1 - PRACTICAL MINIMUM TP GUIDANCE

-  + Market Value Concept – What are its Scope, Ambit and its Parameter?
-  + Identification of Related Companies – the Control or Deemed Control Application
-  + **Related Companies' Transactions-**
 - i. Business Dealing or Non-Business Dealing.
 - ii. Buying on behalf, Bulk Purchase, and Bulk Breaking
 - iii. Services Provided or Sharing Common Cost.
 - iv. Advances, loan to related companies – What are its Application, Implication, and Complication?
-  + **Formulating Pricing** between Related Companies – Practical Illustrations
 - i. Functions Performed
 - ii. Assets Employed
 - iii. Risks Assumed
-  + **Provision of Services**
 - i. Basis of Charging
 - ii. Types of Services
 - Management Services
 - IT Solutions and Support
 - HR and Legal
 - Accounting and Administrative
 - Advertisement and Promotion
 - Marketing
 - Training Services
 - Research & Development
 - iii. **Pricing Policy Writing**
-  + **Proprietary Rights**
 - i. Patents
 - ii. Royalty
 - iii. Licensing Fee
 - iv. **Basis of Charging**
-  + **Rental, Lease of Asset**
 - i. Basis of Charging
 - ii. Sharing of Cost
 - iii. Documentation, Invoice Description
-  + **Minimum TP Doc – *Guidance, Coaching and Writing***
 - i. Company Information
 - ii. Group Information
 - iii. Controlled Transactions












Join us for this 3-Day deep dive into the exciting world of Transfer Pricing! Our expert presenter, Dr Choong Kwai Fatt, he will guide you through the essential skills and knowledge you need to prepare Minimum Transfer Pricing Documentation NOW for This Year Tax Filing. Be in compliance and able to make timely revision while keeping your business in tip-top shape.

DAY 2 - MINIMUM TP METHODOLOGY & APPLICATION

-  **+ Trading Company**
 - i. Sales of Goods
 - ii. The division of Gross Profit between Manufacturing and Trading
-  **+ TP Methodology for Trading – its Applications and Implications**
 - i. Resale Price Method
-  **+ Distributor – its Scope and Ambit**
 - i. Full-fledge Distributor
 - ii. Commissionaire Distributor
 - iii. Agent Distributor
 - iv. Limited Risk Distributor
 - v. Licensed Distributor
-  **+ Manufacturing**
 - i. Entrepreneur/ Full-fledged Manufacturer
 - ii. Licensed Manufacturer
 - iii. Contract Manufacturer
 - iv. Toll Manufacturer
-  **+ TP Methodology for Manufacturing – its Applications and Implications**
 - i. Comparable Uncontrolled Price Method
 - ii. Cost Plus Method
-  **+ FAR Analysis on Manufacturing Activities – its Implications and Complications**
-  **+ Right Organisation Chart Preparation**
 - i. Description of the Management
 - ii. Holding, Subsidiary, Associates and Affiliates
-  **+ Pricing policy – preparation till completion**
 - i. Element of Cost
 - ii. Profit Mark-up
 - iii. Supporting Documentation Needed

DAY 3 - TP DOCUMENTATION ON FINANCIAL ASSISTANCE

-  **+ Loan and Advances – Demarcation and its Significance**
-  **+ Element involving on Loan Transactions**
 - i. Agreement or No Agreement
 - ii. Stamping or No Stamping
 - iii. Loan Tenure
 - iv. Interest Rate Computation and Formulation Basis
-  **+ Interest Income and Deemed Interest Income**
 - i. Application and Challenges
 - ii. Interest-Free or With Interest
 - iii. Confusing Interest Rate to be charged – BLR, ALR, LIBOR
-  **+ Loan from Related Companies – its Importance and Significance**
 - i. Overseas Lender
 - ii. Malaysian Lender
-  **+ Source of Loan to Associate Person**
 - i. Funding from Internal – its Applications and Implications
 - ii. Funding from External – its Applications and Implications
 - iii. Funding from Shares Issued – Ordinary Shares, Preference Shares
-  **+ Related Party to be Loaned – Malaysian Company vs. Overseas Company**
-  **+ Withholding Tax Implications on Loan from Overseas**
-  **+ Earning Stripping Rules on Loan**
-  **+ TP Doc on Loan – Guiding, Coaching and Writing**

PROGRAM TIMELINE (3 DAYS SEMINAR)

DAY ONE

The estimated timeline for Minimum Transfer Pricing Documentation

Practical Questions and Answers session [VERY POPULAR]

The theme of this Special MINIMUM TRANSFER PRICING 2023 Seminar is “**Practical Application**” for Companies. **Covers most important questions in taxation : “Is it deductible?”**

The **Q & A Sessions** are the highlights for this special seminar. Where attendees would submit questions anonymously and Dr Choong will provide answers live during the Live physical seminar. 1 hours allocated for each day.

Where all attendees can learn from each other’s tax concerns, **pre-empt potential challenges** and **exponentially gain a practical solution to frustrating implementation hiccups.**

Stay tune for this very much sought after the Questions and Answers session with Dr. Choong Kwai Fatt.



Presenting the Big Idea in Tax Planning.

🔥 + Market Value Concept – What are its Scope, Ambit and its Parameter?

9.30 AM

🔥 + Identification of Related Companies – the Control or Deemed Control

🔥 + Related Companies’ Transactions

🔥 + Formulating Pricing between Related Companies – Practical Illustrations

12.00 PM

🔥 + Provision of Services

1.00 PM

LUNCH BREAK

Proprietary Rights

2.00 PM

🔥 + Rental, Lease of Asset

🔥 + Minimum TP Doc – **Guidance, Coaching and Writing**

🔥 Q & A Session

4.30 PM

End of seminar.

6.00 PM

Note : Speaker is committed to high quality of presentation and insists that all materials are covered. Therefore the schedule may vary.

PROGRAM TIMELINE (3 DAYS SEMINAR)

DAY TWO

The estimated timeline for Minimum Transfer Pricing Documentation

THE PROBLEM THIS SEMINAR IS ADDRESSING

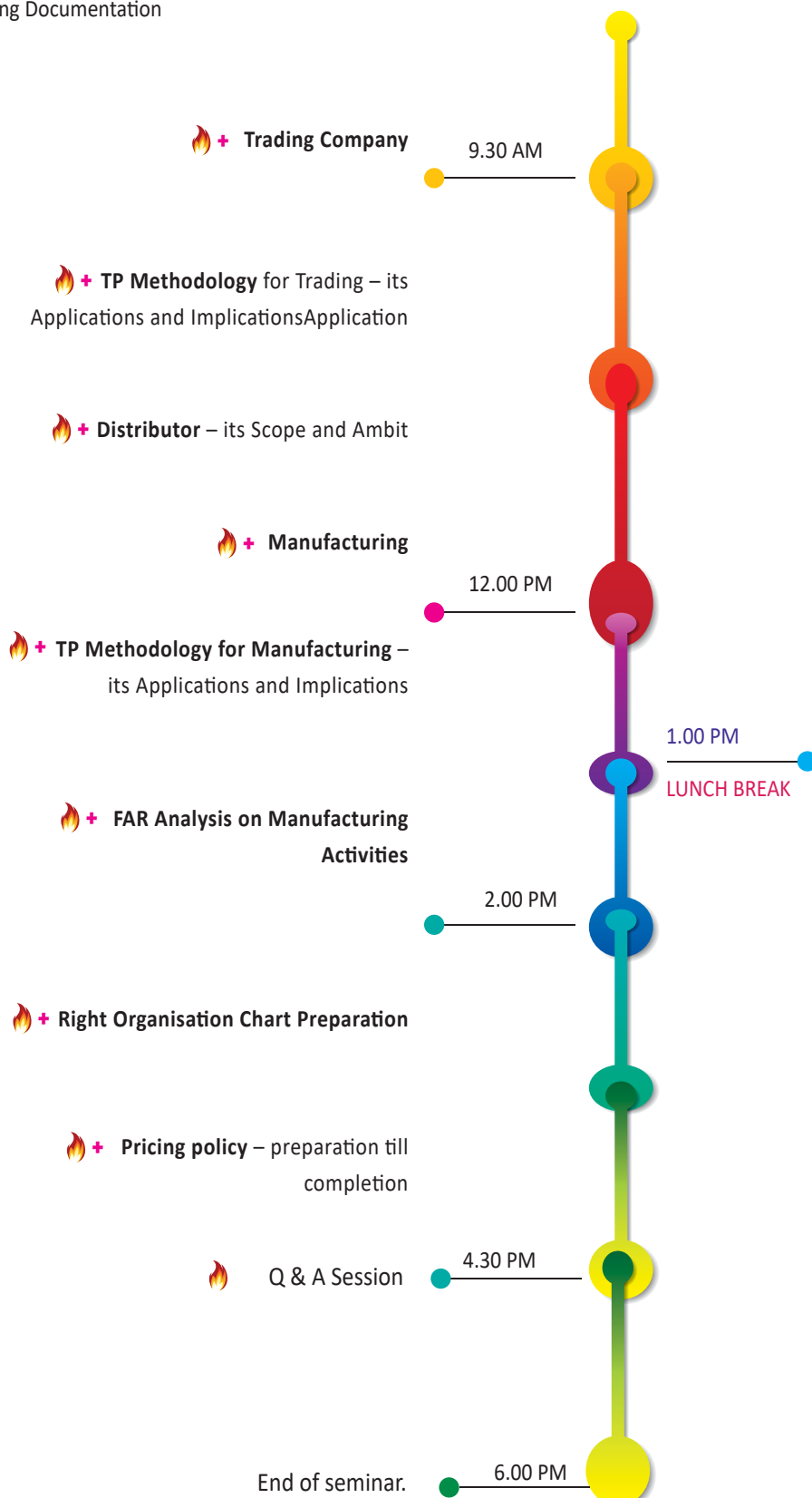
The government now requires Minimum Transfer pricing documentation as a *compulsory tax requirement*. Don't know much about transfer pricing? Well, it's time to get in the know, because here's why:

First off, this is a brand new law. That means everyone is starting on a *level playing field*, so external consultants may not be as valuable in the upcoming year. With so much work to be done, many companies are opting for a review basis instead.

Even if you do outsource some of the work, the *input still needs to come from someone within the company- like you!*

This new requirement also means that *transfer pricing skills are here to stay*. Related party transactions are becoming increasingly common, given the government's focus on incentivising SMEs. Companies are prone to shifting to decentralised structures, which can be tricky to navigate. Don't get left behind- as a decision maker or advisor, transfer pricing know-how is now a Must. So, brush up on your TP knowledge and keep your company compliant.

BRUSH UP YOUR TRANSFER PRICING KNOW-HOW. GET THE DOCUMENTATION READY BEFORE YA 2023 TAX SUBMISSION (AS REQUIRED BY TAX LAW).



Note : Speaker is committed to high quality of presentation and insists that all materials are covered. Therefore the schedule may vary.

PROGRAM TIMELINE (3 DAYS SEMINAR)

DAY THREE

The estimated timeline for Minimum Transfer Pricing Documentation

Practical Questions and Answers session [VERY POPULAR]

The theme of this Special MINIMUM TRANSFER PRICING 2023 Seminar is “**Practical Application**” for Companies. **Covers most important questions in taxation : “Is it deductible?”**

The **Q & A Sessions** are the highlights for this special seminar. Where attendees would submit questions anonymously and Dr Choong will provide answers live during the Live physical seminar. 1 hours allocated for each day.

Where all attendees can learn from each other’s tax concerns, **pre-empt potential challenges** and **exponentially gain a practical solution to frustrating implementation hiccups.**

Stay tune for this very much sought after the Questions and Answers session with Dr. Choong Kwai Fatt.



Presenting the Big Idea in Tax Planning.

🔥 + **Loan and Advances** – Demarcation and its Significance

9.30 AM

🔥 + Element involving on **Loan Transactions**

🔥 + **Interest Income and Deemed Interest Income**

🔥 + **Loan from Related Companies** – its Importance and Significance

12.00 PM

🔥 + **Source of Loan to Associate Person**

🔥 + **Related Party to be Loaned**

1.00 PM

LUNCH BREAK

🔥 + **Withholding Tax Implications on Loan from Overseas**

2.00 PM

🔥 + **Earning Stripping Rules on Loan**

🔥 + **TP Doc on Loan** – Guiding, Coaching and Writing

🔥 Q & A Session

4.30 PM

End of seminar.

6.00 PM

Note : Speaker is committed to high quality of presentation and insists that all materials are covered. Therefore the schedule may vary.

PRICING

Choose the right rate for you.***

Want to attend the seminar at its lowest price ?
Register in group of 3 or more participants in one registration to get additional discount.

THE FULL FEE IS RM 4,800.

EARLY BIRD ENDS ON 11.8.2023.

WITH GROUP REGISTRATION DISCOUNT
OF RM 300 AND RM 600 RESPECTIVELY
STILL APPLICABLE FOR GROUP
REGISTRATION

Register online by using the following link :
www.synergymas.com/MinimumTransferPricing2023

HRDC Claimable *

* Subject to employer's application to PSMB.
As at time of publication of this brochure HRDC limit the amount claimable per participant to RM1,300 per day

1 - 2 pax

3- 4 pax

5 & more

Early Bird Price
(Valid until 11.8.2023)

RM 4,200 per pax for
Three Days

RM 3,900 per pax for
Three Days

RM 3,600 per pax for
Three Days

Normal Price

RM 4,800 per pax for
Three Days

RM 4,500 per pax for
Three Days

RM 4,200 per pax for
Three Days

Register

Register

Register

WANT PROMO DISCOUNT ?

Register early to enjoy
the Early Bird Discount
of RM 300 off^^

^^ By registering five or more,
entitle yourself
additional RM 600 off

Enjoys RM 300 off as
Early Bird Discount
when you registered
Now.

By registering three or more
participants
enjoy an additional RM 300 off from
Promo Discount .

Here's how the math works :

RM 4,800 - RM 600 Early Bird Discount
-RM 300 group registration discount
= RM 3,900

This price is subject to first come first
served basis only.

By registering five or more participants
enjoy an additional RM 300 off from
Promo Discount.

Here's how the math works :

RM 4,800 - RM 600 Early Bird Discount
- RM 600 group registration discount
= RM 3,600.

This price is subject to first come first
served basis only.

VENUE

The seminar will be held in Ballroom, Level 5, The Gardens Hotel,
Mid Valley City.

Within the vicinity of one of Kuala Lumpur's most popular shopping mall, it is
ideal for outstation participants to bring along family to spend a weekend in
Mid Valley City after attending seminar.

Park in Zone B, Zone U or Premier parking zone which normally has adequate
parking available or utilize the hotel valet option which is reasonably priced for
all hotel guests.

Flat rate of RM 5 per entry with validation for parking in Zone B, U or Premier
parking zone.



SYNERGY TAS

Suite 153, PG-15A, Ground Floor, Jaya 33
No. 3, Jalan Semangat, Section 13
46100 Petaling Jaya, Selangor

(+6 016) 302 6109 (Janet) ; (+6 016) 328 6312 (Lau)
event@synergymas.com

IDEAS ARE THE BEGINING POINTS OF ALL FORTUNES.

GET YOUR TAX PLANNING IDEA IS THE
BEGINING POINTS OF GREAT BUSINESS TAX
SAVING AND RISK MANAGEMENT.

See you on 13, 14 & 15 SEPTEMBER 2023 !



MINIMUM TRANSFER PRICING 2023:

GET YOUR PRACTICAL GUIDANCE TO ANALYSE, PREPARE AND WRITING THE COMPLETE MINIMUM TP DOCUMENTATION

IMPORTANT Transfer Pricing Event of the Year.

Participant 1

Name (Mr / Mrs / Ms)

Certificate of Attendance will be printed according to this name.

Designation

Email

Mobile Tel

Participant 2

Name (Mr / Mrs / Ms)

Certificate of Attendance will be printed according to this name.

Designation

Email

Mobile Tel

Participant 3

Name (Mr / Mrs / Ms)

Certificate of Attendance will be printed according to this name.

Designation

Email

Mobile Tel

Participant 4

Name (Mr / Mrs / Ms)

Certificate of Attendance will be printed according to this name.

Designation

Email

Mobile Tel

Participant 5

Name (Mr / Mrs / Ms)

Certificate of Attendance will be printed according to this name.

Designation

Email

Mobile Tel

Terms and Conditions | Cancellation Policy: No refund will be made after payment is made. If the registered participant is unable to attend, a substitute delegate is allowed at no extra charge. However, should there be a request to change the name printed on the e-certificate of attendance to that other than that shown on the registration form, RM 100 extra will be charged as reprinting service charge. The organiser reserves the right to refuse service. The organiser reserves the right to change event date and venue, with notice being sent via the email registered above. Information collected is in pursuant to the Personal Data Protection Act 2010. | **CPD : Final CPD accepted by professional bodies vary and subject to each bodies' discretion. | Seats are confirmed on payment made and on first come first served basis only. You have fully understood the DISCLAIMER OF WARRANTIES AND LIMITATION OF LIABILITY stated in our Synergy TAS PLT website at <http://www.synergymas.com/disclaimer/>. You may not, without our prior written permission, frame or inline link any of the content of this brochure, or incorporate it into another website or other service any of our material, content or intellectual property.

Online version of this form can be access vide this link :

www.synergymas.com/MinimumTransferPricing2023

Fee based on number of registered participant.

** Price quoted is subject to first come, first served basis.*

Tick ☒ to indicate your category of fee.

☐ **1 - 2 Participant(s)**

* RM 4,800 per participant for Three Days

☐ **3 - 4 Participants**

* RM 4,500 per participant for Three Days
(After RM 300 group discount per participant)

☐ **5 or More Participants**

* RM 4,200 per participant for Three Days
(After RM 600 group discount per participant)

Live Event

21 CPD



Date

13, 14 & 15 SEPTEMBER 2023
(Wed. Thurs. & Fri.)



Time

9.00 AM to 6.00 PM DAILY



Location

THE GARDENS, MID VALLEY,
Kuala Lumpur.

Simple way to register

Online Form at www.synergymas.com/MinimumTransferPricing2023 or,

Email : event@synergymas.com

Just scan this form and email to register for seat(s).

Thereafter upon payment, please scan and email the deposit slip to event@synergymas.com.

Billing to

Company

Address

Nature of Business

(Vital information for Speaker to take into account in the preparation of seminar material)

☐ Construction ☐ Management ☐ Developer ☐ Trading ☐ Education ☐ Logistics
☐ Manufacturing ☐ Investment Holding Company ☐ Legal ☐ Tax Agent ☐ Company Secretary
☐ Consultancy ☐ Audit ☐ Real Estate ☐ Health ☐ Retail ☐ Services ☐ Financial Services
☐ Other: _____

Products and Services

e.g. Plastic Producing, Buy Land and Develop, Investment Holding Company, Medical Devices, Chemicals, Waste Products, Diesel, IT, etc.

How do You Know about this Course?

Contact Number

Contact Person

Email of PIC :

Remark

Please make payment stating your Invoice No. as Reference to :

"SYNERGY TAS PLT" (CIMB: 800 707 1544)

either via bank transfer or bank in cheque after issuance of invoice.

REF: 20230812