

Organised By :



TRANSFER PRICING CONFERENCE 2025

Dissecting the Complexity of Transfer Pricing

09 April 2025
Wednesday

Sime Darby Convention Centre
Kuala Lumpur

8 CPD points
(For purposes of Section 153, ITA 1967)



Highlights of the Day

- Decoding the New Malaysian Transfer Pricing Guidelines
- Implementation of the Transfer Pricing Tax Audit Framework 2024
- Business Restructuring & the Arm's Length Principle
- Approach to Low Value Adding Intragroup Services
- Navigating TP Audits: Common Issues

Who Should Attend :


CEO/CFO/
Directors


Financial
Planner


Tax Agent/
Advisor


Corporate
Accountants


Business
Consultants


Public
Accountants

Time	Session
8:15 am	Registration & Welcome Coffee/Tea
8:50 am	Opening Address  Mr. Soh Lian Seng <i>CTIM President</i>
9:00 am	Session 1 : Decoding the New Malaysian Transfer Pricing Guidelines  Moderator <i>Ms. Leow Mui Lee, CTIM Council Member</i>  Speaker <i>Ms. Suhani Anuar, Inland Revenue Board of Malaysia (Invited)</i>  Panelist <i>Ms. Anushia Soosaipillai, PricewaterhouseCoopers Taxation Services Sdn Bhd</i>
10:30 am	Morning Refreshments
11:00 am	Session 1 (Cont.) : Panel Discussion
12:00 pm	Session 2 : Implementation of the Transfer Pricing Tax Audit Framework 2024  Moderator <i>Mr. Tan Chin Teck, BDO Malaysia</i>  Speaker <i>Ms. Shahreen Mahther, Inland Revenue Board of Malaysia (Invited)</i>  Panelist <i>Ms. Chang Mei Seen, CTIM Council Member</i>
1:00 pm	Networking Lunch
2:00 pm	Session 3 : Business Restructuring & the Arm's Length Principle  Moderator <i>Mr. SM Thanneermalai, Thannees Tax Consulting Services Sdn Bhd</i>  Speaker <i>Mr. Subhabrata Dasgupta, Deloitte Tax Services Sdn Bhd</i>
3:00 pm	Session 4 : Approach to Low Value Adding Intragroup Services  Moderator <i>Mr. Thenesh Kannaa, CTIM Council Member</i>  Speaker <i>Ms. Sylvia Song, Crowe KL Tax Sdn Bhd</i>
4:10 pm	Session 5 : Navigating TP Audits: Common Issues  Moderator <i>Ms. Theresa Goh, TG Consulting Sdn Bhd</i>  Panelist <i>Mr. Sockalingam Murugesan, Ernst & Young Tax Consultants Sdn Bhd</i>  Panelist <i>Ms. Kalsumawati Mohd Aris, Shell Malaysia Limited</i>
5:30 pm	End of Conference and Refreshments

Anushia Soosaipillai leads the PwC Transfer Pricing practice and has more than 20 years of transfer pricing experience in PwC Malaysia. Her vast experience includes assisting and advising companies in various transfer pricing projects and defending challenges to transfer prices by tax authorities in tax audits and investigation. She has successfully worked on a number of MAP and APA cases over the years. She is Board of Governor for the American Malaysia Chamber of Commerce (AMCHAM) and sits in the Transfer Pricing Technical Committee of CTIM. She is a regular author for IBFD publications.

Chang Mei Seen advises multinational companies on transfer pricing issues, including preparation of transfer pricing documentation in compliance with the Malaysian transfer pricing guidelines, transfer pricing advisory and planning for risk mitigation as well as involvement in defending clients during transfer pricing audits by the Inland Revenue Board. In addition, she has also been involved in restructuring exercises in various industries. Her previous experience as an auditor has allowed her to better understand the client's business conditions and devise appropriate transfer pricing solutions. Her past experience also includes corporate tax compliance engagements where she manages a portfolio of clients from a diversified range of industries. Chang Mei Seen is currently a Council Member of CTIM.

Kalsumawati Mohd Aris leads the tax function of Shell Malaysia with 25 years of experience in direct (both Petroleum Income Tax and Corporate Income Tax), indirect and employment taxes, with expertise ranging from tax policy, advisory, compliance, corporate structuring, mergers and acquisitions, tax audits and investigations, transfer pricing audits and cross border exposures management. She ensures that the Shell Malaysia Group of Companies comply with the letter and the spirit of the tax laws. She also holds the role as the Convenor of the Fiscal and Economics sub-committee of the Petroleum Production Sharing Contractors Committee (PPSC), a committee of the Malaysian International Chamber of Commerce & Industry (MICCI). She works closely with government authorities, actively advocates for new improved tax policies and has been invited to participate in and provide input to various task forces on tax policy matters. Prior to joining Shell, she was a Tax Manager in the tax practice of Ernst and Young specialising in the Financial Services sector. She holds a Bachelor of Accounting from University of Malaya.

Leow Mui Lee is the Managing Director of Lumenz Tax Advisory Sdn Bhd and has over 30 years of tax experience with leading international accounting as well as professional services firms in Malaysia. Mui Lee is a Council Member of CTIM as well as a member of CPA Australia and the MIA. She specialises in transfer pricing, tax dispute resolution, tax due diligence reviews as well as corporate tax advisory services. She has serviced a broad spectrum of clients including large multinational corporations and public listed companies.

Shahreen Mahther joined IRBM since 2003 bringing with vast experiences in field audit, transfer pricing, MAP and international tax. Currently serving as a Transfer Pricing Specialist in the Multinational Tax Branch, she held the position as the as the Director of Transfer Pricing Policy Section. She has represented Malaysia in OECD meetings and contributed to various national and international tax platforms. She is also a member of the Two-Pillar Approach Committee. She holds a Master of Forensic Accounting and Financial Criminology from Universiti Teknologi MARA, and recently completed her Postgraduate Diploma in Transfer Pricing in Middlesex University, London.

SM Thanneermalai is the Managing Director of Thannees Tax Consulting Services Sdn Bhd, and a renowned tax expert in Malaysia with over 40 years of experience in handling complex tax issues, resolving tax disputes, and obtaining special permissions from various government agencies. He is a pioneer in transfer pricing, establishing Malaysia's first transfer pricing practice in 1996 at PricewaterhouseCoopers Malaysia. As former President of the CTIM and Chairman of the Board of Trustees of the Malaysian Tax Research Foundation, he contributed to the development of tax laws in Malaysia. He was also a Senior Tax Partner at PricewaterhouseCoopers for 22 years and Managing Director of Crowe Horwath KL Tax Sdn Bhd for 2 years. Currently, he is a licensed tax agent and a member of multiple professional organisations—the Institute of Chartered Accountants in England & Wales, MIA, and CTIM.

Sockalingam Murugesan is the EY Asean Transfer Pricing Leader and he also heads the Transfer Pricing practice in Malaysia. A partner in Ernst & Young Tax Consultants Sdn Bhd, Socka has over 20 years of experience in tax consultancy, of which more than 15 years were in Transfer Pricing. Socka's experience includes leading engagement teams in the preparation of transfer pricing documentation for intangible transactions, and the provision of management services. He has also been involved in the design and implementation support of tax-effective supply chains for clients carrying out wide-ranging cross-border transactions. Additionally, Socka has assisted clients in dealing with the tax authorities on Advance Pricing Arrangements (APA) and transfer pricing audits.

Subhadrata Dasgupta is a partner and the transfer pricing leader in Deloitte Malaysia. Subho has close to 20 years' experience in serving clients from varied industries: electronics and electrical, pharmaceuticals, real estate & construction, consumer and industrial products, financial services, and agribusiness, among others. He specialises in transfer pricing policy design and due diligence, business restructuring including IP migration, and controversy management. Subho leads ESG transfer pricing offerings for Deloitte Asia Pacific, and co-leads transfer pricing controversy for Deloitte Southeast Asia. He is a member of Deloitte's global tax policy, transfer pricing controversy, and intellectual property core groups. Subho has been recognised as a leading transfer pricing advisor in the Guide to the World's Leading Transfer Pricing Advisors. He has been also recognised as a Highly Regarded Practitioner in World TP produced by ITR World Tax in association with the International Tax Review.

Suhani Anuar has started career with IRBM in 1999 and has been in various departments including Tax Policy Department, Investigation Department, Malaysia Tax Academy and KL Collection Branch, to name a few. Leveraging on her vast experiences in tax audit and investigation as well as tax advisory on tax policy, tax incentives and LBATA implementation, she is now heading the Transfer Pricing Division of Department of International Taxation. Prior to the current designation, she was a division director of Monitoring and Compliance Division in Multinational Tax Branch overseeing the processing on appeals and reliefs. She holds a master degree in forensic accounting & financial criminology from UiTM and bachelor degree in accountancy from UKM.

Sylvia Song is an Executive Director of Crowe KL Tax Sdn Bhd in Malaysia. She specialises in transfer pricing (TP) and leading a TP team in Crowe Kuala Lumpur. She has been involved in various TP assignments such as TP documentation, TP planning, price setting, TP audits & investigation, regional TP work, etc. Sylvia has worked in the tax professional environment for over 16 years and has the experience in tax compliance, tax advisory including individual / corporate tax matters, tax incentives, transfer pricing, tax planning, GST and others. She services both domestic and multinational clients and manages a portfolio from a broad range of industries such as manufacturing, trading, services, property development, construction, digital business, etc. She has conducted various transfer pricing seminars to clients / public.

Tan Chin Teck is an Executive Director in the Transfer Pricing Group of BDO in Malaysia and currently sits in the Transfer Pricing Technical Committee of CTIM. He has over 13 years of working experience in audit, tax and advisory services. He joined BDO in Malaysia in 2018, advising clients on transfer pricing compliance and advisory issues. Prior to joining BDO, he is also experienced in audit, financial and tax due diligence, GST, and accounting advisory. His diverse work experience enables him to help clients review, document, manage and defend their transfer pricing policies and processes. Chin Teck is a member of the Institute of Chartered Accountants in England and Wales (ICAEW), the Malaysian Institute of Accountants (MIA), the ASEAN Chartered Professional Accountants (ASEAN CPA), and an associate of the Chartered Tax Institute of Malaysia (ACTIM). He holds a Bachelor's Degree in Accounting from Universiti Malaya.

Thenesh Kannaa is an Executive Director at TRATAX Sdn Bhd, a consulting firm specialised in taxation and member firm of WTS Global. Thenesh is also the APAC International Tax Lead of WTS Global. At CTIM, he chairs the Tax Policy and is a member of Institutes Technical Committees on Transfer Pricing as well as Indirect Taxation. Thenesh has authored three (3) books on Malaysian taxation, two (2) chapter-in-books for international tax publications of IFA and IBFD respectively. Thenesh is also a member of ACCA's expert panel on taxation and a member of IFA Malaysia's exco. He has made technical and tax policy-related presentations at over 100 tax conferences hosted in Malaysia, Australia, China, Hong Kong, India, Indonesia, Japan, Netherlands, Portugal, Singapore, Taiwan and Thailand. He is also regularly interviewed on contemporary tax matters by the Star, the EDGE, BFM 89.9 and Astro Awani. His core practice areas include transfer pricing, where he has assisted businesses of diverse sizes and sectors on transfer pricing policy/strategy, documentation, audit representation and MAP matters.

Theresa Goh is the Founder and CEO of TG Consulting Sdn Bhd. Prior to TG Consulting, she was a Senior Tax Partner in Deloitte Southeast Asia for 19 years and led the Deloitte Transfer Pricing (TP) Practice for 18 years. She is a former Council Member of CTIM and MICPA and sits in the TP Technical Committee of CTIM and the Tax Committee of MICPA. She is a licensed Tax Agent and Accredited Trainer with HRD Corp. Her experience includes TP Documentation and advisory, TP Audit Defence, MAP and APA cases.

Registration Fees

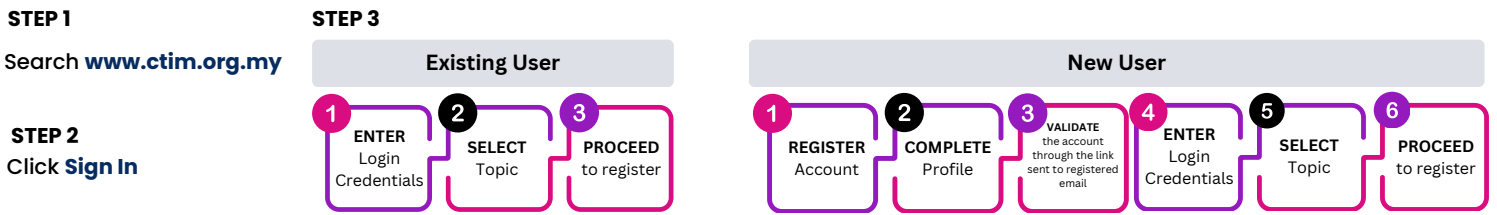
Category	Registration Fees (exclusive of Service Tax)
CTIM Member	RM735.00
Member's Firm Staff	RM835.00
Non-Member	RM885.00

Important Notes:

- The registration fee exclusive of service tax.
- Member's Firm Staff is the staff/colleague of a CTIM Member within the same firm.
- Please select the participant category carefully as it determines the fee payable. No alteration will be allowed upon registration.

HRDCORP Programme ID : 10001513230
 Payment via HRDCorp Claim - Please refer to the total amount stated in the invoice generated by the system upon confirmation of registration

Online Registration Process
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Confirmation of Registration	Verification of Attendance	e-Certificate of Attendance
A confirmation email will be issued within 7 working days before the conference to the confirmed registration.	Must register before 10:00 am on the conference day	The Certificate of Attendance will only be released to the registered participant with full attendance and full payment within 7 working days after the conclusion of the conference.

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Closing Date
 2 days before the event date

The CPD points awarded qualify for the purpose of application and renewal of tax agent license under Section 153, Income Tax Act, 1967

