

Webinar Series

Transfer Pricing Audits: Key Tips to Minimise Risk and Exposure

Date: 11 September 2025, Thursday

Time: 9:00 am – 5:00 pm

Event Code : 25WS/035

Registration Fee

Category	Registration Fee (exclusive of Service Tax)
CTIM Member	RM360.00
Member's Firm Staff	RM415.00
Non-Member	RM475.00

IMPORTANT NOTES:

- Registration of participant will be confirmed upon receipt of full payment and settlement of previous outstanding dues (if any)
- Webinar Access Link - The webinar access link will be e-mailed to successfully registered participants 2 working days before the commencement of the event upon receipts of full payment
- Cancellation - The institute must receive cancellations in writing not less than 5 working days prior to the event. No refund will be given for cancellation received within less than 5 working days of the event.
- Recording - Video recording of the webinar organised by the institute is not available for distribute.
- Disclaimer - The organiser reserves the right to change the speaker, date or to cancel the event. A minimum of 3 working days notice will be given.

HRDCORP Programme ID : To be Confirmed

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

Introduction

Many taxpayers are unfamiliar with Transfer Pricing (TP) audit procedures and are unsure how to prepare when an audit arises. With the recent surge in TP audit activity, it is increasingly important for taxpayers to understand the audit process and the Inland Revenue Board's (IRB) audit practices. Proper preparation can significantly reduce TP-related risks and potential tax exposure.

Since there is typically insufficient time to prepare once the IRB initiates an audit, proactive steps must be taken now to ensure readiness.

Training Outcome

Participants will gain a clear understanding of the TP audit process, including key IRB practices, requirements, and timelines. They will also learn how to identify and assess potential TP risks and explore practical risk mitigation strategies that can be implemented in advance of any audit.

Course Outline

Session 1

Understanding the TP Audit Framework 2024 & TP Rules 2023

- Latest changes
- TP audit procedures
- Arm's length range
- TP adjustments
- Surcharge

Session 2

Common TP Audit Issues & Trends

- Business restructuring
- Losses/low margins
- Intra-group services
- Financing transactions
- Characterisation
- TP methods
- Case studies

Session 3

TP Risk Assessment

- Comparables
- Economic and comparability adjustments
- Non-contemporaneous TP documentation

Session 4

Risk Mitigation Strategies

- Comprehensive TP Documentation
- Voluntary Disclosure
- APA

Session 5

TP Audit Management

- Information request from IRB
- PPT presentation
- Interview of HODs
- Negotiations with IRB
- Best practices and case studies

Speaker's Profile

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.

Online Registration Process

*Kindly follow the respective steps as below

STEP 1

Search www.ctim.org.my

STEP 2

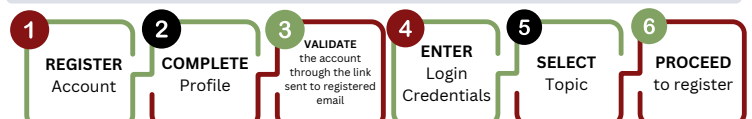
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STEP 3

Existing User



New User



Any Inquiries, contact us at:

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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

