

Image source: Freepik.com

MIA WEBINAR SERIES

# STRATEGIES FOR A STRONG TRANSFER PRICING AUDIT DEFENCE: KEY CONSIDERATIONS

7 October 2025 (Tuesday), 9.00 am – 5.00 pm

PROGRAMME OUTLINE

8.30 am – 9.00 am	Participants login to join the webinar	1.00 pm – 2.00 pm	Break
9.00 am – 11.00 am	<p>SESSION 1</p> <ul style="list-style-type: none"> <li>What's New in TP Audit Framework 2024? <ul style="list-style-type: none"> <li>&gt; Change in basis for selection of cases</li> <li>&gt; Removal of minimum covered period</li> <li>&gt; Mandate for 450 calendar days completion</li> <li>&gt; Progressive penalty rates surcharge</li> </ul> </li> <li>TP Risk Assessment &amp; Risk Mitigation <ul style="list-style-type: none"> <li>&gt; Identifying TP risks</li> <li>&gt; Quantifying TP risks</li> <li>&gt; Case study</li> </ul> </li> </ul>	2.00 pm – 4.00 pm	<p>SESSION 3</p> <ul style="list-style-type: none"> <li>Handling Tax Authorities During a TP Audit <ul style="list-style-type: none"> <li>&gt; Best practices</li> <li>&gt; Case study</li> </ul> </li> <li>Managing TP Documentation to Minimise Audit Risks <ul style="list-style-type: none"> <li>&gt; Preparing the right type of TP Documentation</li> <li>&gt; Ensuring TP Documentation is contemporaneous</li> <li>&gt; Data, info, and documentation requirement under TP Rules 2023</li> <li>&gt; Special Factor Analysis</li> <li>&gt; Economic adjustments</li> <li>&gt; Right choice of comparable companies</li> </ul> </li> </ul>
11.00 am – 1.00 pm	<p>SESSION 2</p> <ul style="list-style-type: none"> <li>TP Risk Assessment &amp; Risk Mitigation (cont'd) <ul style="list-style-type: none"> <li>&gt; Consider risk mitigation strategies before audit commences</li> <li>&gt; Voluntary disclosure</li> <li>&gt; Advanced pricing arrangements (APA)</li> <li>&gt; Preparing TP Audit defence file</li> </ul> </li> <li>Preparation for a TP Audit <ul style="list-style-type: none"> <li>&gt; Updating benchmarking analysis in the course of an audit</li> <li>&gt; Presentation to Tax Authorities</li> <li>&gt; Preparing HODs for interview</li> <li>&gt; Preparing documents, agreements etc</li> <li>&gt; Case study</li> </ul> </li> </ul>	4.00 pm – 5.00 pm	<p>SESSION 4</p> <ul style="list-style-type: none"> <li>TP Audit Adjustments and Surcharge <ul style="list-style-type: none"> <li>&gt; Arm's length range</li> <li>&gt; Challenges to comparable companies</li> <li>&gt; Challenges to economic and comparability adjustments</li> <li>&gt; Calculation of TP adjustment and surcharge</li> <li>&gt; Case study</li> </ul> </li> </ul>
		5.00 pm	End of Webinar

NOTE: The order of topics to be covered may be revised at the trainer/speaker's discretion.

The Transfer Pricing landscape in Malaysia has seen many changes lately with the issue of TP Rules 2023, TP Guidelines 2024, and TP Audit Framework 2024.

The Inland Revenue Board of Malaysia (IRBM) has increased its efforts in enforcing stricter TP compliance and intensify audit scrutiny. Companies therefore must ensure that they are prepared when the IRBM comes calling.

OBJECTIVES

This programme seeks to help you:

- Understand the new audit procedures and penalties in TP Audit Framework 2024
- Learn to assess TP risk and consider various mitigation strategies
- Understand the IRB's expectations in an audit
- Be prepared for an audit interview
- Work towards an amicable settlement

METHODOLOGY

A highly interactive learning session with trainer/speaker-led facilitation, live Q&As, quick polls/surveys, self-assessment quizzes and participant's feedback on learning outcome achievement.

WHO SHOULD ATTEND

- C-Suite Executives
- Directors and Board Members
- General Managers
- Finance Managers and Tax Managers

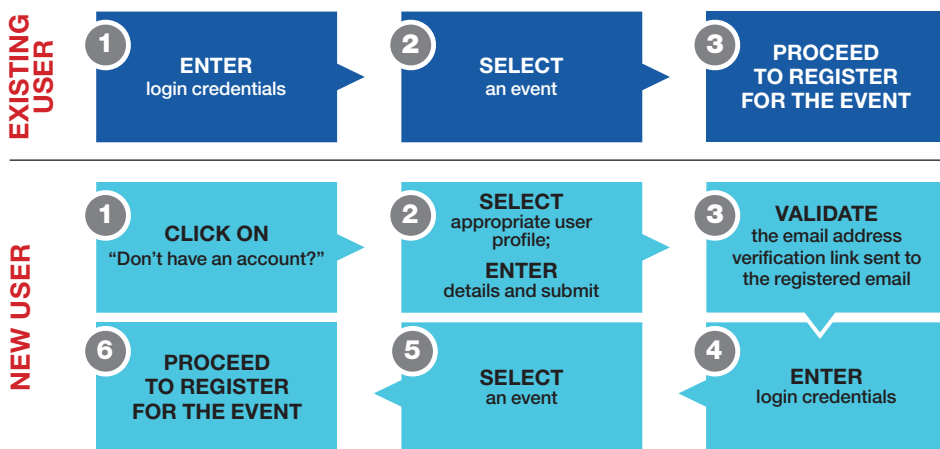
# Strategies for a Strong Transfer Pricing Audit Defence: Key Considerations

With immediate effect, enrolment for all CPE programmes will be

**STRICTLY VIA ONLINE REGISTRATION ONLY**

## REGISTRATION PROCESS

- To view more events and download the full brochure, please visit: [pd.mia.org.my](http://pd.mia.org.my)
- Search and select the event
- Click 'Register' to experience the new system by continuing with the respective steps below:



For any assistance, please call (8.45am-5.30pm, Monday-Friday)

**MIA Help Desk @ 603-2722 9000**

## TERMS & CONDITIONS FOR WEBINARS

### WEBINAR FEE

- Fee is payable to MALAYSIAN INSTITUTE OF ACCOUNTANTS
- For selected webinars, the fee includes e-materials.
  - **Individual Registration:** Full payment shall be made at the point of online registration.
  - **Corporate Registration:** Full payment shall be made within thirty (30) days from the date of the Invoice or 1 day before the webinar, whichever earlier.
- Access to join the webinar shall be granted only upon full payment as per the above requirement.

### WEBINAR ACCESS LINK

- The Access Link will be emailed at least 24-hours before the commencement of the webinar.
- The Access Link is unique and should not be forwarded/shared with others.

### PAYMENT MODE

- Payment must be made through the **electronic channels i.e. online payment via the MIA member service portal and electronic fund transfer (EFT).**
- Payment by **cash and cheque is NOT ACCEPTABLE** effective from 1 January 2022.

### HRD CORP (FOR CLAIMABLE EVENTS ONLY)

- MIA is an approved Training Provider registered under 'Institut Akauntan Malaysia' (MyCoID: 631967).
- **Employer's Obligations**
  - To ensure grant approval is obtained prior to event registration and to provide the Grant ID notification upon event registration.
  - To make full payment to MIA as per the issued Invoice within 14 working days upon receipt of MIA's notification in the event the approved training fee is cancelled by HRDC due to non-compliance on the part of the participant or his/her employer or any valid reasons stipulated by HRDC.
  - To settle the balance payment to MIA within 14 working days upon receipt of MIA's notification in the event only partial claim is approved by HRDC. MIA will provide copy of the original invoice and will not issue a new invoice for the balance amount.
  - If employer has made payment prior to grant approval, a refund will be made to employer subject to reimbursement received from HRDC. Refund will be made upon receipt of duly completed employer's EFT Form.
  - To provide required information and/or documents after completion of event for the purpose of HRDC Claim within 7 working days upon receipt of MIA's notification.

### CANCELLATION

- Should the participant decide to cancel his/her enrolment, a cancellation policy shall be applied as follows:
- For written cancellation received with minimum seven (7) days' notice from the date of the webinar, no penalties will be imposed and full refund will be made to participants who have paid.
  - For written cancellation received less than seven (7) days from the date of the webinar, an administrative charge of 20% of the registration fee will be imposed. Unpaid registrations will also be liable for a 20% administrative charge.
  - No refunds will be made for written cancellations received on the day of the webinar or for participants who failed to join the webinar. Unpaid registrations will also be liable for full payment of the registration fee.
  - Replacing registered participants is not allowed.
  - Paid registration that is cancelled can opt to transfer the paid amount to future event(s) after deducting any applicable administrative charges.
  - The transfer request to future event(s) should be confirmed by Corporate/Individual within three (3) days after cancellation otherwise the cancellation will be confirmed with refund action. Transfer request will not be entertained after the refund is processed.
  - Corporate/Individual is required to top-up the balance amount if the amount to be transferred to the future event is insufficient.

- Any excess amount after transfer will be refunded to the Corporate/Individual's bank account as provided in the EFT form.
- Corporate/Individual is required to provide the EFT form each time when a refund is requested.

### PARTICIPANT'S CLASSIFICATION AND INFORMATION

#### Category: Corporate/Individual

- Please select the participant classification carefully as it determines the fee payable. No alteration will be allowed upon registration.
- The information on Corporate/Individual provided shall be deemed true and correct. No alteration will be allowed upon registration.

### METHODOLOGY, CERTIFICATE OF ATTENDANCE AND CPE CREDIT HOURS

- Live Q&As, quick polls/surveys will be carried out throughout the webinar.
- For selected webinars, pre and/or post course materials will be shared with participants.
- Self-assessment quizzes at the beginning as well as at end of the webinar will be given to enable participants to self-evaluate themselves on their learning performance and level of understanding of the programme content.
- **Participants will be issued with an e-certificate of attendance and awarded CPE credit hours upon strict compliance of the following terms:**
  - **Remain logged in at least 80% of the time allocated for the webinar,**
  - **Submit the post-course evaluation on learning outcome within 3 days after the completion of the webinar (late submission of the post-course evaluation will not be entertained).**

- CPE credit hours will be credited into the MIA Member Services Portal within 14 days of the webinar for participants who have complied with all terms and conditions stipulated herein.
- Listening to pre-recorded webinar and/or reading from past webinar e-material shall not qualify as structured CPE credit hours.

### COPYRIGHT

The materials of the webinar shall not be disclosed or used in any manner, either wholly or partially against any other parties and/or used in any manner, either wholly or partially as a defence by you and/or any other parties under any circumstances. The participants are therefore prohibited from reproducing any materials of this programme. All copyright and/or intellectual property rights in any relevant materials produced in this Programme will remain with the party who produced such materials. MIA disclaims responsibility for the materials of this programme. Neither the MIA, its Council or any of its Boards or Committees nor its staff shall be responsible or liable for any claims, losses, damages, costs or expenses arising in any way out of or in connection with any persons relying upon the materials provided during the webinar.

### DATA PROTECTION

Information given by the participants to MIA is true, accurate and to the best of their knowledge. The participants have read and agreed with the Privacy Notice as stated on MIA's official website and therefore, allow MIA to collect, process, store and use the participants' data other than what is provided under the Personal Data Protection Act 2010.

### EXCLUSION OF LIABILITY

This webinar shall not constitute an endorsement of the speaker(s) by MIA and MIA shall not be liable for whatsoever circumstances arising from any engagement between the speaker(s) and the webinar's participants.

### DISCLAIMER

Malaysian Institute of Accountants (MIA) reserves the right to change the speaker(s), date(s), time(s) and to cancel the webinar should circumstances beyond its control arise. MIA shall not be responsible for any costs, damages or losses incurred by the participant due to the changes and/or cancellation. MIA also reserves the right to make alternative arrangements without prior notice should it be necessary to do so. Upon registering, you are deemed to have read and accepted the terms and conditions herein.

## FACILITATOR

### THERESA GOH

Theresa is the Founder and CEO of TG Consulting Sdn Bhd. Prior to TG, she was a Senior Tax Partner at Deloitte Southeast Asia and was the National Transfer Pricing Leader. Her career in Deloitte spans over 40 years with 37 in taxation, serving major multinational clients and domestic corporates. She advised clients on transfer pricing planning and controversy including audit defense, appeals and dispute resolution. She successfully assisted clients in resolving complex transfer pricing and tax issues, applied alternative dispute resolution methods, and negotiated unilateral and bilateral advance pricing agreements.

Theresa is a Certified Public Accountant (MICPA), a Chartered Accountant of MIA, and a fellow member of the Chartered Tax Institute of Malaysia (CTIM). She was a council member of MICPA and CTIM and is currently a member of MICPA's Tax Committee and a member of CTIM's TP Technical Committee. She has provided training to various branches of the Inland Revenue Board of Malaysia and regularly participates in operational dialogues with the Board.

## WEBINAR FEES

Member/Member Firm	RM 550
Non-member	RM 700

*Preferred Payment: Pay with MIA-CIMB Affinity Credit Card.*

## WEBINAR DETAILS & REGISTRATION

HRDC Training Programme No.: TBA

7 October 2025 (Tuesday)

Session 1	: 9.00 am – 11.00 am
Session 2	: 11.00 am – 1.00 pm
Session 3	: 2.00 pm – 4.00 pm
Session 4	: 4.00 pm – 5.00 pm

Contact : Naqeeb  
 Tel : 03 2722 9293  
 Fax : 03 2722 9009  
 Email : [sp@mia.org.my](mailto:sp@mia.org.my)  
 Address : Malaysian Institute of Accountants  
 Dewan Akauntan  
 Unit 33-01, Level 33,  
 Tower A, The Vertical  
 Avenue 3, Bangsar South City  
 No. 8, Jalan Kerinchi  
 59200 Kuala Lumpur