

# Preparing Audit -Ready TP Documentation

\*Recognised by MOF for Application & Renewal of Tax Agent License (7 CPD Hours)



**June 20, 2024**  
(Thursday)

**09:00 a.m. – 05:00 p.m.**



**Total CPD Hours:**  
**8 hours**



## REGISTRATION FEE:

MICPA & CAANZ Members /  
Approved Training Employer  
(ATE)

**RM360.00**

Non-Members

**RM480.00**

## INTRODUCTION

As the Special Voluntary Disclosure Program (SVDP 2.0) is ending on 31 May 2024, we can expect the IRB to intensify its audit activities and not be so lenient with taxpayers especially on penalties. Any TP adjustments that IRB may make for non-arm's length transactions will carry a surcharge of 5% of the amount of the adjustment.

The recently issued Transfer Pricing Rules 2023 also requires compliance with TP Documentation failing which IRB will impose penalties of RM20,000 to RM100,000 per year of assessment or imprisonment up to six months on conviction.

## WEBINAR OBJECTIVE

- An understanding of the requirements of TP Rules 2023
- Managing challenging areas of TP Doc preparation
- Insights into what you can do to meet the compliance requirements
- Identify and plug the gaps in your TP Doc to ensure you are ready for a TP audit
- Identify and evaluation Transfer Pricing risks and risk mitigation methods

## PROGRAMME OUTLINE

**09:00 a.m. – 05:00 p.m.**

### Pre-Quiz

- TP Rules 2023
  - Quiz
  - Understanding the requirements of TP Rules 2023
  - Additional info, data and doc requirements in Schedules 1 and 2
  - Penalty for non-compliance with TP Rules 2023

### Challenging Areas of TP Documentation Preparation

- Characterisation and TP Policy
- Choosing suitable Comparables
- Case studies
- Intra-group services
- Intra-group financing

### TP audits

- Common TP Audit Issues
- Case studies
- Sharing of practical experience
- TP risk assessment
- TP risk mitigation

### Q&A & Post-Quiz

### End Session

## SPEAKER'S PROFILE

**MS THERESA GOH LEE HWA** has served Deloitte as a tax partner for 21 years, out of which 16 years were as a SEA tax partner. She's also instrumental in setting up the Transfer Pricing practice in Deloitte Malaysia in 2003 and grew it as the National TP Leader to become the largest in the country. She assisted many clients with their TP audit defense and controversy and secured outcomes that were amicable and favorable to the clients.