

Latest Update on Transfer Pricing Compliance



June 16, 2025
(Monday)

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

Disclaimer:

MICPA reserves the right to:

- Change the agenda or any relevant details without notice;
- Cancel the event due to any unforeseen circumstances; and
- Close the registration should the participant number exceeds capacity

INTRODUCTION

There have been many changes recently in the Malaysia Transfer Pricing (TP) regulatory landscape companies need to keep abreast of these changes.

Following the issue of the Transfer Pricing Rules 2023, the IRB has released the following in December 2024:

- Transfer Pricing Guidelines 2024
- Transfer Pricing Audit Framework 2024

The TP Guidelines 2024 which is effective from the Year of Assessment 2023 provides clarity on how the TP Rules 2023 will be applied. It introduces new exemptions from preparation of Contemporaneous TP Documentation (CTPD) and revised thresholds for CTPD. It also imposes new content requirements for Minimum TP Doc and introduced the simplified approach for Low Value-Adding Services.

The TP Audit Framework 2024 takes effect from 24 December 2024. The key changes under this Audit Framework include a change in the basis of selection of TP audit cases and a removal of the minimum covered period for TP audit. From year of assessment 2023 onwards, failure to submit the required CTPD to the IRB within 14 days upon request will be subject to a penalty of RM20,000 to RM100,000 or imprisonment of not more than 6 months, or both. The RM100,000 kicks in if the TP Doc is not contemporaneous or provided after 28 days after the due date for submission to the IRB.

WEBINAR OBJECTIVE

Participants will be able to assess and evaluate the level of completeness of the Company's TP Documentation, identify gaps and suggest an action plan to plug the gaps. Participants will be able to identify TP audit risks and prepare audit-ready TP Documentation

PROGRAMME OUTLINE

09:00 a.m. – 05:00 p.m.

Pre-Quiz

What's new in Malaysia TP Guidelines 2024

- Exemption from preparing Contemporaneous TP Documentation (CTPD)
- Revised threshold for requirement to prepare CTPD
- Relaxation for minimum CTPD requirement
- Introduction of simplified approach for Low Value-Adding Intragroup services
- Guidance on pass-through costs
- Updating benchmarking analysis in the course of an audit
- Business restructuring - robust analysis and documentation requirement
- Data, info and doc requirement under TP Rules 2023
- Case Study - application to the Group

What's new in TP Audit Framework 2024?

- Change in basis for selection of cases
- Removal of minimum covered period
- Mandate for 450 calendar days completion
- Progressive penalty rates
- TP Adjustments
- Special factor analysis

Is your TP Doc Contemporaneous?

- CTPD preparation deadline
- Dating of CTPD
- Completeness of CTPD
- Intra-group services
- Case Study

TP audit risk assessment

- Identify risk areas
- Understand various risk mitigation strategies

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.