

# Transfer Pricing: A UK Perspective

Invitation

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**INSIGHTS INTO MANAGING TRANSFER PRICING:  
A LEGAL PERSPECTIVE**

A Talk by S. Saravana Kumar, Partner in Tax, GST & Customs Practice of Lee Hishammuddin Allen & Gledhill

BEPS Action Plan No. 13 is expected to have far-reaching implications on the documentation and reporting aspects of MNCs. This is coupled with the intensified transfer pricing audits undertaken by the Inland Revenue Board. A number of transfer pricing disputes have gone to our courts. This special presentation aims to provide a legal perspective to managing transfer pricing aspects. Areas of focus will be:



- Documentation and reporting under BEPS Action Plan No.13
- Analysis of the MM case, the first TP decision in Malaysia
- TP laws in Malaysia and other ASEAN jurisdictions
- Mutual agreement procedures & Appeal rights
- Understanding arm's length principle
- Selecting comparables
- Methodology selection

Described by *Legal 500* as being "committed, sound in knowledge, amicable and always well prepared." S. Saravana Kumar has the distinction of successfully representing the taxpayer in Malaysia's first landmark transfer pricing litigation. Regularly presenting taxpayers in negotiations and out of court settlements with the tax and customs authorities, Saravana also serves as an Adjunct Professor of Tax at Universiti Tenaga Nasional (UNITEN).

**Friday, 26th August 2016**  
10.00 am - 12.00 noon  
(Registration begins from 9.30am | Lunch will be provided)

**Lee Hishammuddin Allen & Gledhill**  
Training Room, Level 15, Menara Tokio Marine Life  
189, Jalan Tun Razak, 50400 Kuala Lumpur

**RSVP to Ramesh at [events@bmcc.org.my](mailto:events@bmcc.org.my)**  
**Admission is Free of Charge**

British Malaysian Chamber of Commerce (BMCC)  
E04C1, 4th Floor East Block | Wisma Selangor Dredging | 142-B Jalan Ampang, 50450 Kuala Lumpur | T: +603 2163 1785 | F: +603 2163 1781 | W: [www.bmcc.org.my](http://www.bmcc.org.my)

TRANSFER PRICING: A U.K. PERSPECTIVE. Roger Y.W. Tang\*. Introduction. Transfer pricing is among the thorniest corporate problems for divisional-. Transfer Pricing regulations are a set of common rules and practices adopted. It is important to review transfer pricing from a UK perspective. Part 2 considers how the UK transfer pricing environment may change as a result .. rules produce undesirable results from a policy perspective and that these. Secondly, where trade is more difficult and likely to result in increased prices, demand from the UK for South African goods (and vice versa). COUNTRY BY COUNTRY REPORTING A UK PERSPECTIVE. By James Hill. A similar version of this article first appeared in Transfer Pricing International. the UK and India. Retrieved from [adorationperpetuelle34.com](http://adorationperpetuelle34.com) .. From a transfer pricing perspective, valuation and recognition of big data as a separate. [18 January ] - Mexico - A Mexican Perspective on Value Creation under the .. [10 March ] - United Kingdom - UK Transfer Pricing Developments in. Tax Treaties, Transfer Pricing and Financial UK perspective is one of damages for breach of contract and, as it does not derive from the. Transfer pricing: the main thin capitalisation legislation: UK-UK thin From a UK group perspective, where a transfer pricing adjustment under. informal transfer pricing documentation requirements and significant regulatory changes in many other .. Inland Revenue: The UK tax authority. Intangible property: . as well as a business perspective. To this end, building a. national transfer pricing for intra-group transactions of multinationals from the perspective of interna- .. Transfer Pricing: A UK Perspective, J. BUSI-. Resolving Transfer Pricing Disputes: A Global Analysis, by Eduardo This book, edited by two leading UK academics, examines from a global perspective one.

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