



Summary of PKF Regional Transfer Pricing webinar conducted on November 20, 2024

Topic: “Navigating Transfer Pricing Challenges: Key Emerging Issues and the Interplay with Pillar Two in Asia Pacific”

Considering the new legislative developments and emerging issues/trends in Transfer Pricing (TP) regulations and practices throughout Asia Pacific region over the past decade, this region has gained strategic and critical importance both in terms of managing TP compliance for any MNE Group and setting up or relocation of business operations or activities.

With this backdrop, our TP experts from PKF Australia, PKF Malaysia and PKF Singapore recently hosted a joint webinar to analyze and discuss the latest TP developments and emerging TP issues in their respective countries and Asia Pacific as a region as well. Further, our experts also shared the best practices and practical tips for navigating the complexities of TP and adapting to regulatory changes along with providing a detailed overview of how the Pillar Two framework would reshape TP compliance requirements and strategic decision-making for businesses operating across borders.

The first speaker, Ms. Becky Nguyen (Partner, Taxation - PKF Melbourne), addressed transfer pricing compliance requirements for taxpayers in Australia. She covered emerging issues related to cross-border financing arrangements, intangible migration, and highlighted recent transfer pricing court cases. Additionally, she discussed the OECD's BEPS Two-Pillar Solutions and their implications for Australia.

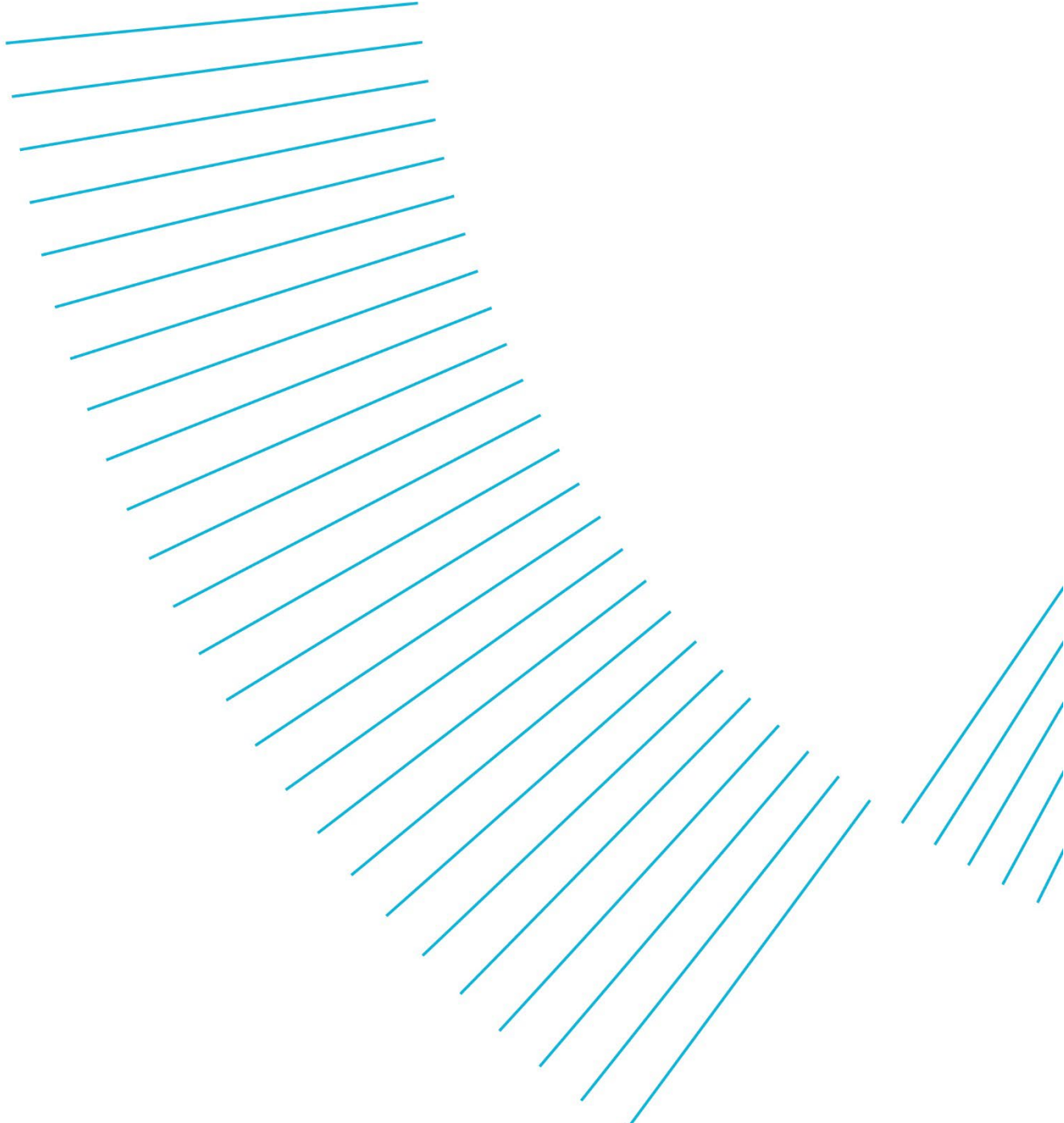
Thereafter, the second speaker was Ms. Ai Chen Lim (Partner, Taxation - PKF Malaysia) who gave the audience a detailed overview of the TP compliance thresholds applicable in Malaysia and a summary of the amended rules along with an overview of the emerging TP litigative issues/trends and the status of Global Minimum Tax (Pillar Two) rules in Malaysia.

Lastly, the final speaker was Mr. Sahil Seth (Director, Transfer Pricing – PKF Singapore) who briefly discussed about the current TP landscape prevalent in Singapore and what are the specific TP compliance requirements for all taxpayers with related party transactions (whether cross-border or domestic). He also explained the key and varied TP litigative issues and what are the possible TP dispute prevention and resolution mechanisms or avenues available for taxpayers. Last but not the least, Mr. Seth briefly touched upon the Global Minimum Tax (Pillar Two) rules and how it will impact the overall Tax and TP landscape.

Towards the end, Mr. Seth also explained the emerging common Transfer Pricing issues/trends across APAC region and what are the various potential TP strategies that can be adopted by the taxpayers for such issues/trends.

Finally, the floor was open for a Q&A session and many of the attendees had several questions on different TP topics and all the questions were addressed by all the 3 speakers which was highly appreciated by the attendees.

At PKF, we have a dedicated team of global TP experts and specialists based out of all the major countries of the world, who have rich and significant experience spread across different industries and sectors. Our team can provide all the necessary assistance and support in terms of TP compliance, advisory, dispute prevention and dispute resolution, in accordance with the local rules and regulations as well as the global TP principles and standards prescribed by the OECD.



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