

# Decoding the Myths of Transfer Pricing in Business Restructuring

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Multinational groups often restructure to stay competitive (especially in light of the recent US Reciprocal Tariff) — shifting functions, assets or risks. But when profitability drops in the restructured entity without real change in operations, it raises red flags with IRBM. Proper alignment between economic substance and tax outcomes is crucial.

## Key Transfer Pricing Themes

- ▶ Is the drop in profit justified by reduced functions and risks?
- ▶ Are you genuinely restructuring — or just shifting paper?
- ▶ Would an independent party accept this change?



Thursday, 3 July 2025



10:00am - 12:00pm



Holiday Inn  
Kuala Lumpur Bangsar

## Programme Highlights

- ▶ Overview of Business Restructuring
- ▶ OECD Guidance on Business Restructuring
- ▶ Malaysia-Specific Considerations
- ▶ Case Studies
- ▶ Forum Discussion
  - Other tax implications
  - Valuation of “compensation”
- ▶ Live Q&A

## Speakers



**Tan Chin Teck**  
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**Elis Tan**  
Executive Director,  
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**Koo Kian Ming**  
Executive Director, Tax  
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**Eng Cha Lun**  
Executive Director,  
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