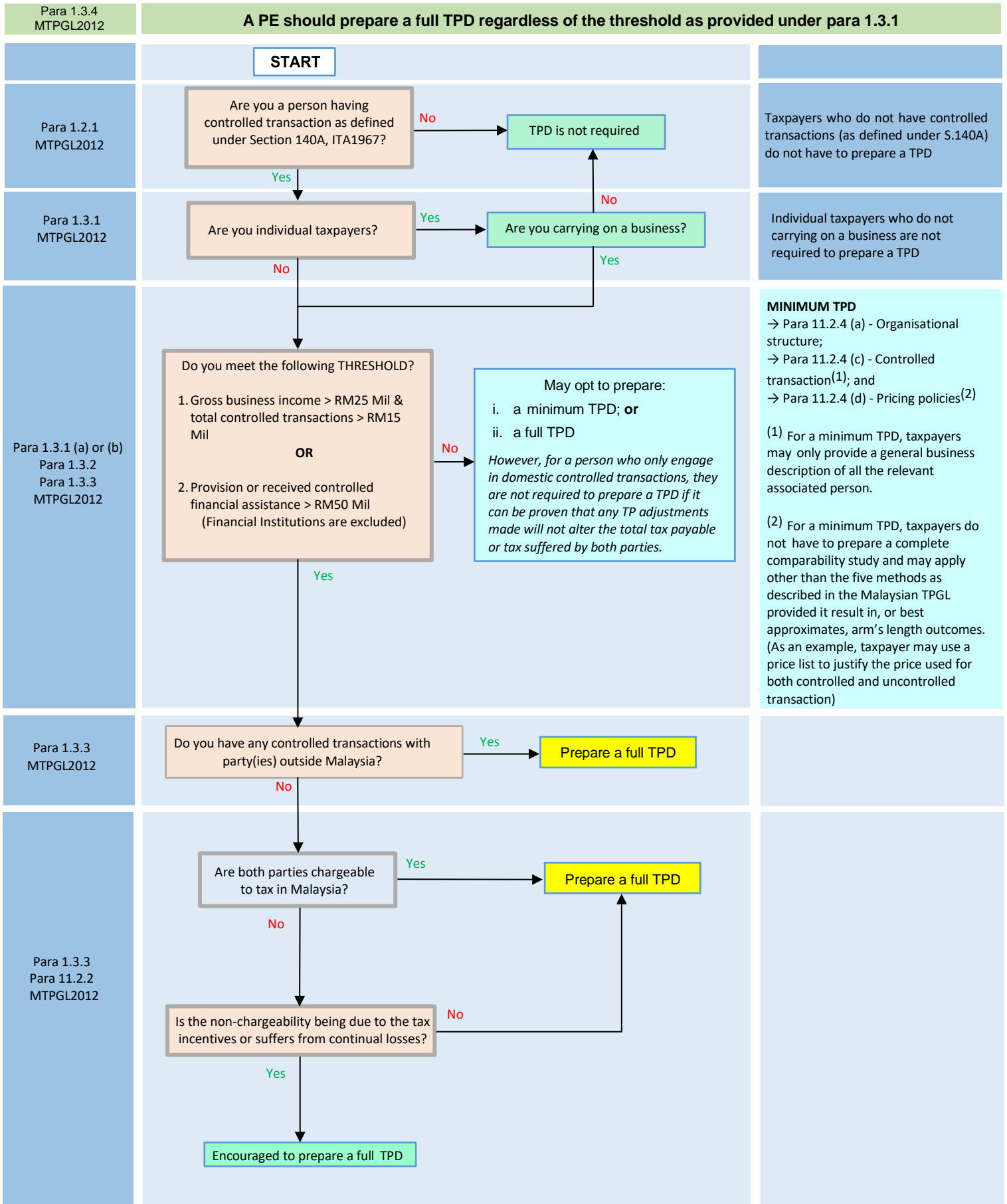


MALYSIAN TRANSFER PRICING GUIDELINES 2012 (MTPGL2012)

SCOPE AND APPLICATION FOR THE PREPARATION OF A CONTEMPORANEOUS TRANSFER PRICING DOCUMENTATION (TPD)



AMENDMENTS

Paragraph	Old Version	New Version	Remarks
Para 1.3.1 MTPGL2012	Are you a person carrying on a business?	Are you individual taxpayers?	This change has been made to align with para 1.3.1 since the exception is given only to individuals with no business income.
Para 1.3.1 (a) or (b) Para 1.3.2 Para 1.3.3 MTPGL2012	Do you meet the following THRESHOLD? 1. For a person carrying on a business, Gross business income > RM25M & controlled transactions > RM15M OR 2. where a person provides financial assistance, such financial assistance > RM50M (Financial Institutions are excluded	Do you meet the following THRESHOLD? 1. Gross business income > RM25 Mil & total controlled transactions > RM15 Mil OR 2. Provision or received controlled financial assistance > RM50 Mil (Financial Institutions are excluded)	For easy reference on how the threshold should apply.
Para 1.3.3 MTPGL2012	Do you have any controlled transactions with related person(s) outside Malaysia?	Do you have any controlled transactions with party(ies) outside Malaysia?	The word “controlled transactions” already refers to transactions with a related person.
Para 1.3.3 Para 11.2.2 MTPGL2012	Are you and all of your related person(s) chargeable to tax in Malaysia?	Are both parties chargeable to tax in Malaysia?	To simplify the statement.
Para 1.3.3 Para 11.2.2 MTPGL2012	Do you or any of your related person(s) enjoy tax incentives or suffers from continual losses, or is taxed at a different rate, where any adjustments made may alter the total tax payable?	Deleted	This question is deleted due to duplication.