

**FREQUENTLY ASKED QUESTIONS (FAQ)
SPECIAL VOLUNTARY DISCLOSURE PROGRAMME 2.0
INLAND REVENUE BOARD OF MALAYSIA**

UPDATED ON 22 AUGUST 2023

NO.	QUESTION	ANSWER
A. INTRODUCTION / PURPOSE		
1.	What is the Special Voluntary Disclosure Programme (SVDP) 2.0 all about?	<p>SVDP 2.0 is one of the government's efforts to encourage taxpayers to come forward voluntarily and declare their income accordingly during the program implementation period. This is an initiative of the Inland Revenue Board of Malaysia (IRBM) to support the pillars of sustainability in the tax administration in line with the concept of Malaysia Madani. This programme provides an opportunity for taxpayers to increase their level of tax compliance based on the AES (Awareness, Education, Service) concept practised at the IRBM.</p> <p>The voluntary disclosure scope under SVDP 2.0 includes:</p> <ul style="list-style-type: none">a. Declaration of undeclared / under-declared income, overclaimed / disallowed expenses / claims, overclaimed relief / deductions / rebates and overclaimed capital allowances / incentives;b. Declaration of asset disposal; andc. Stamping of documents / agreements that are not stamped within the stipulated time.
2.	When will this SVDP 2.0 be implemented?	SVDP 2.0 will be implemented for the period of 06 June 2023 until 31 May 2024.

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3.	What benefits can I get from this SVDP 2.0?	<p>Through SVDP 2.0, the penalty rates which will be imposed are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Category of Voluntary Disclosure</th> <th style="text-align: center;">Penalty Rate</th> </tr> </thead> <tbody> <tr> <td>New taxpayers</td> <td style="text-align: center;">0%</td> </tr> <tr> <td>Existing taxpayers who: <ul style="list-style-type: none"> a. have not submitted the Income Tax Return Form (ITRF) for any year of assessment involved; b. have submitted the ITRF but did not report income accurately in accordance with the IRBM rulings that are in force for the year(s) of assessment involved. </td> <td style="text-align: center;">0%</td> </tr> <tr> <td>Taxpayers who have not declared disposal of assets for the year(s) of assessment involved.</td> <td style="text-align: center;">0%</td> </tr> <tr> <td>Duty payer who submits document / agreement that has been executed (signed) on or before 01 May 2023 for stamping from 06 June 2023 to 31 May 2024.</td> <td style="text-align: center;">0%</td> </tr> </tbody> </table> <p>Taxpayers are advised to take the opportunity to participate in this SVDP 2.0 to avoid audit enforcement actions with penalties imposed based on the Tax Audit Framework currently in force.</p>	Category of Voluntary Disclosure	Penalty Rate	New taxpayers	0%	Existing taxpayers who: <ul style="list-style-type: none"> a. have not submitted the Income Tax Return Form (ITRF) for any year of assessment involved; b. have submitted the ITRF but did not report income accurately in accordance with the IRBM rulings that are in force for the year(s) of assessment involved. 	0%	Taxpayers who have not declared disposal of assets for the year(s) of assessment involved.	0%	Duty payer who submits document / agreement that has been executed (signed) on or before 01 May 2023 for stamping from 06 June 2023 to 31 May 2024.	0%
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4.	Does SVDP 2.0 apply to voluntary disclosure made on incorrect tax rates?	<p>Tax rate amendment is not part of the income / expenses that can be reported / claimed in SVDP 2.0. The scope of SVDP 2.0 covers:</p> <ul style="list-style-type: none"> a. Declaration of undeclared / under-declared income, overclaimed / disallowed expenses / claims, overclaimed relief / deductions / rebates and overclaimed capital allowances / incentives; b. Declaration of asset disposal; and c. Stamping of documents / agreements that are not stamped within the stipulated time.
5.	What does SVDP 2.0 mean for stamp duty?	SVDP 2.0 for stamp duty offers a full waiver of penalty imposition on any document / agreement that has been executed (signed) on or before 01 May 2023 and has yet to be / has not been stamped.
B. CATEGORY OF TAXPAYERS		
6.	Who is eligible to participate in SVDP 2.0?	<p>Eligible taxpayers are:</p> <ul style="list-style-type: none"> a. New taxpayers who have never declared income to the IRBM but have commenced a business or have received income. b. Taxpayers who have previously declared income to IRBM and still have income / additional income not declared. c. Taxpayers who have not declared disposal of assets. d. Duty payer who submits any document / agreement that has been executed (signed) on or before 01 May 2023 for stamping from 06 June 2023 to 31 May 2024.

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7.	What does “new taxpayer” mean?	<p>The new taxpayers referred to under SVDP 2.0 are as follows:</p> <ul style="list-style-type: none"> a. Taxpayers who have yet to obtain or have obtained Tax Identification Number (TIN); b. Taxpayers who do not have any tax transaction in IRBM’s records (taxpayers are deemed to have tax transactions if an estimated assessment has been raised / has made a Monthly Tax Deduction (MTD) in which taxpayer is regarded to have opted not to submit ITRF and the MTD is regarded as final tax; and / or c. Taxpayers who have declared income to the IRBM for the first time.
8.	What are the categories of taxpayer files and the provisions of the act involved in this SVDP 2.0?	<p>This SVDP 2.0 involves all categories of taxpayer files under the provisions of the Income Tax Act (ITA) 1967 / Real Property Gains Tax Act (RPGTA) 1976 / Stamp Act (SA) 1949.</p> <p>The provisions of the law under ITA 1967 / RPGTA 1976 / SA 1949 relate to the imposition of penalties and surcharges as follows:</p> <ul style="list-style-type: none"> a. Subsection 112(3) ITA 1967 b. Subsection 113(2) ITA 1967 c. Subsection 140A(3C) ITA 1967 d. Subsection 29(3) RPGTA 1976 e. Subsection 47A(1) SA 1949 <p>However, SVDP 2.0 does not involve the employer file category.</p>

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9.	Does this voluntary disclosure applicable to non-resident taxpayers?	Yes. This SVDP 2.0 applies to all categories of non-resident taxpayers.
10.	Can I make a voluntary disclosure on behalf of a deceased taxpayer?	Yes, you can provided you are the legal administrator of the estate of the deceased.
11.	As an employer, I have yet to remit the Monthly Tax Deduction (MTD) on behalf of my employees. Can I make a voluntary disclosure under SVDP 2.0?	No. The employer file category does not fall under the category of taxpayers eligible for SVDP 2.0. The responsibility of the employer to remit the proper MTD payment is in accordance with the procedures in force.
12.	I am one of the partners of ABC Partnership. Can I make a voluntary disclosure for this partnership file?	Voluntary disclosure of partnership income shall be made on a partnership file with the consent of all partners. Each partner who also chooses to participate in SVDP 2.0 will be entitled to the penalty rate under SVDP 2.0.
C. YEAR OF ASSESSMENT INVOLVED		
13.	What assessment year is covered by SVDP 2.0?	<p>Voluntary disclosure can be made by eligible taxpayers and the year(s) of assessment involved are as follows:</p> <ul style="list-style-type: none"> a. For new taxpayers, income declaration is for the year of assessment 2022 and its preceding year(s). b. For existing taxpayers who have previously declared income to IRBM, the year of assessment involved is the year of assessment 2021 and its preceding year(s). c. For Real Property Gains Tax (RPGT), the

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		asset disposal declaration is for the year of assessment 2022 and its preceding year(s).
14.	Does voluntary disclosure involve time barred period?	<p>Yes, all voluntary disclosures for prior year's income will be assessed appropriately based on the year(s) of assessment as provided under the tax law.</p> <p>For RPGT, voluntary disclosure of the asset disposal declaration in the preceding year will be assessed based on the year of assessment when the asset was disposed of.</p>
15.	Will voluntary disclosure of the prior year's income be taxed in the year the income is received?	All voluntary disclosures of income in the preceding year(s) will be taxed in the appropriate year of assessment as provided under the tax law.
D. AUDIT / INVESTIGATION CASE		
16.	Will my declaration of voluntary disclosure be reviewed?	<p>Under SVDP 2.0, taxpayers must make accurate income declarations and tax computations in accordance with the IRBM rulings that are in force. A review will be carried out to ensure the accuracy of the tax computations (mathematical / calculation error) based on the voluntary disclosures submitted.</p> <p>During the implementation period of this programme, IRBM will receive the voluntary disclosure information in good faith. A review of either audit / investigation will not be carried out on the year(s) of assessment relating to the income declared voluntarily.</p>

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NO.	QUESTION	ANSWER
17.	Can I participate in this SVDP 2.0 if I am currently being audited / investigated?	<p>Taxpayers are not eligible to participate in SVDP 2.0 for any Year of Assessment (YA) where the commencement of audit / investigation action has been initiated.</p> <p>The meaning of audit action commencement is as outlined in the Tax Audit Framework in force.</p> <p>Example:</p> <p>Taxpayers are being audited for YA 2020 and YA 2021. Taxpayers are not eligible to participate in SVDP 2.0 for YA 2020 and YA 2021. Taxpayers are still eligible to participate in SVDP 2.0 for YA 2019 and its preceding year(s).</p>
18.	I have failed to make a tax payment on a voluntary disclosure made. In the future if I am being audited, will the penalty under SVDP 2.0 be maintained?	<p>Taxpayers who fail to make tax payments within the stipulated period may be subject to audit / investigation action in the future. The imposition of penalties on the audit / investigation findings (if any) is based on the provisions currently in force and the penalties offered under SVDP 2.0 will not apply to this audit / investigation findings.</p> <p>Example:</p> <p>The taxpayer joined SVDP 2.0 for YA 2020 on 01 July 2023 and failed to make payment within the stipulated period. In year 2025 the taxpayer's case was selected for audit because there was information on unreported income for YA 2020. There are audit findings for YA 2020 and penalties will be imposed based on the Tax Audit Framework currently in force on these findings.</p>

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E. VOLUNTARY DISCLOSURE PROCEDURE		
19.	Can a voluntary disclosure be made via phone call / WhatsApp app/ social media?	<p>No. Voluntary disclosures should be made through the following methods:</p> <p>a. For new taxpayers, ITRF / Real Property Gains Tax Return Form (RPGTRF) must be submitted within the implementation period of SVDP 2.0, either by e-Filing/ e-CKHT or manual forms.</p> <p>b. For existing taxpayers:</p> <p>i. Did not submit ITRF / RPGTRF. ITRF/ RPGTRF must be submitted within SVDP 2.0, either by e-Filing / e-CKHT or manual forms.</p> <p>ii. Has submitted ITRF but there is undeclared income. The voluntary disclosure must be submitted through the SVDP 2.0 Link accessible on IRBM Official Portal https://www.hasil.gov.my / MyTax using the SVDP 2.0 Additional Income Reporting Form and tax computation. The tax computation should only be submitted by taxpayer with company, business, and partnership file category.</p> <p>c. For voluntary disclosure involving transfer pricing issues, Voluntary Disclosure Form for Transfer Pricing Case can be downloaded from IRBM Official Portal. The completed form together with attachments must be submitted to the IRBM office handling the taxpayer's file or to the nearest IRBM office.</p> <p>d. For duty payers, the documents / agreements must be submitted through Stamp Assessment And Payment System (STAMPS) for the stamping process.</p>

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NO.	QUESTION	ANSWER
20.	I have never registered with IRBM. How do I register an income tax file?	<p>Since 2023, all taxpayer files will be automatically registered with Tax Identification Number (TIN). Taxpayers can check the income tax registration file number through:</p> <p>a. Online through the e-Daftar application in the MyTax Portal at https://mytax.hasil.gov.my; or</p> <p>b. Nearest IRBM service counter.</p> <p>If you have any further questions / queries on this matter, please contact the Hasil Care Line at 03-89111000/ 603-89111100 (overseas).</p>
21.	Can I make a voluntary disclosure before the SVDP 2.0 implementation period begins?	Taxpayers will not be prevented from making voluntary disclosures before the implementation period of SVDP 2.0 but will not be considered as their participation in this SVDP 2.0. This means, the penalty to be imposed is subject to the Tax Audit Framework currently in force. The reduction of the penalty will be considered on the grounds of the appeal submitted.
22.	I have not submitted ITRF / RPGTRF but have made a voluntary disclosure by letter or e-mail. Do I need to submit ITRF / RPGTRF?	Yes. For taxpayers who have not submitted ITRF / RPGTRF, taxpayers are required to submit ITRF / RPGTRF via e-Filing / e-CKHT / manual forms to participate in this SVDP 2.0. Voluntary disclosure submitted by letter or e-mail will not be accepted because it does not comply with the conditions of SVDP 2.0.

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NO.	QUESTION	ANSWER
23.	Will IRBM issue a SVDP 2.0 letter based on the voluntary disclosure made for ITRF / RPGTRF via e-Filing?	<p>IRBM will issue a Special Voluntary Disclosure Programme 2.0 Letter to taxpayers who meet the eligibility requirements of SVDP 2.0.</p> <p>For taxpayers who have submitted a voluntary disclosure through ITRF / RPGTRF via e-Filing and meet the eligibility requirements, taxpayers can contact the nearest State IRBM / Special Branch to obtain the Special Voluntary Disclosure Programme 2.0 Letter.</p>
24.	How does a tax agent submit voluntary disclosure for taxpayer?	<p>Voluntary disclosures should be made through the following methods:</p> <p>a. For new taxpayers: Tax agent must submit ITRF through the TAeF System.</p> <p>b. For existing taxpayers:</p> <p>i. Have not submitted ITRF / RPGTRF. Tax agent must submit ITRF through the TAeF System.</p> <p>ii. Has submitted ITRF but there is undeclared income. Tax agent needs to log in to MyTax Portal to submit the SVDP 2.0 Additional Income Reporting Form and tax computation by using individual ID and choose Tax Agent Category.</p> <p>Tax agent needs to enter the taxpayer's information by ensuring that the taxpayer's information is accurate and then upload the SVDP 2.0 Additional Income Reporting Form and tax computation. The tax computation should only be submitted by taxpayer with company, business and partnership file category.</p>

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NO.	QUESTION	ANSWER
25.	Can tax agent submit voluntary disclosure through the MyTax Portal in bulk?	Voluntary disclosure made through the MyTax Portal cannot be submitted in bulk and must be made individually for each taxpayer's voluntary disclosure.
26.	I have never registered a business with the Companies Commission of Malaysia (SSM). Can I report my income through SVDP 2.0?	Yes, you can. Taxpayers must first register with IRBM to obtain Tax Identification Number (TIN) and subsequently submit ITRF / RPGTRF for the relevant year(s) of assessment.
27.	If the audited account is not yet available, can I make a voluntary disclosure based on the Management Account?	Yes, you can. IRBM will receive voluntary disclosure information made within the SVDP 2.0 implementation period. However, if there is any difference after the Management Account has been audited, the taxpayer must make the appropriate amendments and the penalty rate under SVDP 2.0 shall still apply.
28.	Do supporting documents need to be submitted together with a voluntary disclosure?	Not necessary.
29.	If I have made voluntary disclosure under this SVDP 2.0, will I be subject to audit / investigation action?	Audit / investigation action will not be carried out in the future for the year of assessment in which the voluntary disclosure is made. However, audit / investigation action can be taken for the year of assessment involved for the following circumstances: a. If voluntary disclosure is made on non-transfer pricing issues only and it is found that there is a risk on transfer pricing issues, audit / investigation action can be taken on the transfer pricing issues and if voluntary disclosure is made on transfer pricing issues only, audit and investigation can be taken on issues other than transfer pricing.

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		b. Tax payment on the voluntary disclosure has been failed to be made within the stipulated time period.
30.	Can I make a voluntary disclosure even if I am not sure whether I am eligible or not taxable?	<p>The clarification of whether the taxpayer is eligible or not taxable can be obtained from the IRBM officer at any State IRBM / Special Branch before a voluntary declaration is made.</p> <p>In addition, taxpayers may also contact:</p> <p>a. HASiL Live Chat;</p> <p>b. HASiL Care Line at 03-89111000/ 603-89111100 (overseas); or</p> <p>c. Nearest IRBM service counter.</p>
31.	How can I appeal for the exemption of the imposition of stamp duty penalty under SVDP 2.0?	Duty payers can submit an appeal for the exemption of penalty online through STAMPS.
F. PAYMENT RULES		
32.	When should tax payments for voluntary disclosure be paid?	<p>The taxpayer must make a lump sum tax payment within 30 days from the date of assessment notice or in instalments based on the agreed instalment payments arrangement until the end of the SVDP 2.0 implementation period.</p> <p>The application for instalment payment must be submitted through the SVDP 2.0 Link accessible on IRBM Official Portal / MyTax using the SVDP 2.0 Instalment Payment Application Form.</p>

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NO.	QUESTION	ANSWER
33.	If there is no tax payment made until the end of the SVDP 2.0 period, what is the action that will be taken against me?	<p>If the taxpayer fails to settle the balance of tax payment at the end of the stipulated period, the tax increase will be charged based on the provisions of the tax law in force.</p> <p>If the tax arrears are not paid within the stipulated period, legal action may be taken and taxpayers can be audited / investigated in the future.</p>
G. APPEAL		
34.	If I have filed an appeal through Form Q, can I make a voluntary disclosure?	Taxpayers can make a voluntary disclosure if it does not involve a reduced assessment.
35.	If I have made a voluntary disclosure within the implementation period of SVDP 2.0, can I appeal for a reduction in tax on the assessment raised?	Appeals can be filed in accordance with the appeal procedure currently in force.
H. INCOME RECEIVED / KEPT ABROAD		
36.	<p>I have income earned from Malaysia and kept in a bank account abroad.</p> <p>a. Is this income subject to tax imposition in Malaysia?</p> <p>b. Am I eligible to participate in SVDP 2.0 if I have never declared the income?</p>	<p>a. Income earned or derived from Malaysia even if held in a bank account abroad is subject to income tax in Malaysia. The taxpayer is obliged to declare this income.</p> <p>b. Taxpayers are eligible to participate in SVDP 2.0 if the income is not declared and tax is not paid in Malaysia. The taxpayer must declare the income based on the year(s) of assessment it was received and subject to the terms and conditions.</p>

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37.	Is foreign source income eligible to participate in SVDP 2.0?	<p>As of 1 January 2022, overseas income received in Malaysia by residents is subject to the imposition of income tax in Malaysia. However, there is a tax exemption given in respect of overseas income received in Malaysia by residents who are subject to certain terms and conditions.</p> <p>If the income received is not subject to tax exemption, the income should be reported in the tax declaration for the Year of Assessment 2022.</p> <p>Refer to the <u>Guidelines on Tax Treatment on Income Received From Abroad (Amendment)</u> dated 29 December 2022 accessible from the IRBM Official Portal for more information.</p> <p>If the income is not reported, only new taxpayers are eligible to participate in SVDP 2.0 subject to the terms and conditions of the income received. New taxpayers are eligible to participate in SVDP 2.0 as it involves the Year of Assessment 2022.</p>
38.	What is meant by the foreign income received in Malaysia?	<p>Received in Malaysia means remitted or brought into Malaysia in the form of:</p> <ul style="list-style-type: none"> a. Cash or fund transfer; or b. Cash and fund transfer. <p>The remittance performed will have to meet the legislation in force.</p>

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I. TRANSFER PRICING		
39.	Does SVDP 2.0 apply to Transfer Pricing (TP) issues?	Voluntary disclosures for TP issues is subject to the Criteria and Procedures for Voluntary Disclosures of TP Cases outlined in the Transfer Pricing Audit Framework in force. The surcharge offered under this SVDP 2.0 is 0%.
40.	If the surcharge offered under this SVDP 2.0 is 0%, what does it mean by the statement “Any transfer pricing adjustment arising from the voluntary disclosure under SVDP 2.0 can be subjected to a surcharge under subsection 140A(3C), ACP 1967, even if no additional assessment is raised”? as stated in paragraph 5.5.6 of Operational Guidelines No. 2/2023.	<p>The paragraph means voluntary disclosures will be accepted for TP issues involving upward TP adjustments regardless whether it resulted in assessment or not.</p> <p>For applications involving downward TP adjustments, only taxpayers engaged in domestic controlled transactions and have a positive net tax effect are eligible to make voluntary disclosure on condition that both parties make voluntary disclosure on TP.</p>
41.	Who is eligible for the benefits offered under the SVDP 2.0 that involve TP issues?	<p>Taxpayers who carry out controlled transactions with related companies are eligible for voluntary disclosure for TP issues except:</p> <ul style="list-style-type: none"> i. For taxpayers who carry out domestic controlled transactions; and ii. Any adjustments made under the current TP Guidelines will not alter the amount of tax payable or incurred by both parties.

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42.	In accordance with the response to question 40, does this mean that if there is no change to the overall tax position, IRBM will not accept the participation in SVDP2.0 for such cases?	<p>If there is no change to the net impact of the tax position, both parties are not eligible under the SVDP 2.0. The example is as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Description</th> <th style="text-align: center;">Co. A (RM)</th> <th style="text-align: center;">Co. B (RM)</th> </tr> </thead> <tbody> <tr> <td>Profit from business</td> <td style="text-align: right;">4,500,000</td> <td style="text-align: right;">7,000,000</td> </tr> <tr> <td>(+) Additional TP adjustment (SVDP 2.0)</td> <td style="text-align: right;">900,000</td> <td style="text-align: right;">(900,000)</td> </tr> <tr> <td>Adjusted Income</td> <td style="text-align: right;">5,400,000</td> <td style="text-align: right;">6,100,000</td> </tr> <tr> <td>(-) Capital Allowance</td> <td style="text-align: right;">(800,000)</td> <td style="text-align: right;">(500,000)</td> </tr> <tr> <td>Aggregate Statutory Income from Business</td> <td style="text-align: right;">4,600,000</td> <td style="text-align: right;">5,600,000</td> </tr> <tr> <td>Tax rate</td> <td style="text-align: center;">24%</td> <td style="text-align: center;">24%</td> </tr> <tr> <td>Tax impact</td> <td style="text-align: right;">216,000</td> <td style="text-align: right;">(216,000)</td> </tr> <tr> <td>Net tax impact</td> <td colspan="2" style="text-align: center;">Nil</td> </tr> </tbody> </table>	Description	Co. A (RM)	Co. B (RM)	Profit from business	4,500,000	7,000,000	(+) Additional TP adjustment (SVDP 2.0)	900,000	(900,000)	Adjusted Income	5,400,000	6,100,000	(-) Capital Allowance	(800,000)	(500,000)	Aggregate Statutory Income from Business	4,600,000	5,600,000	Tax rate	24%	24%	Tax impact	216,000	(216,000)	Net tax impact	Nil	
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Profit from business	4,500,000	7,000,000																											
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NO.	QUESTION	ANSWER																								
43.	Is a taxpayer eligible to participate in SVDP 2.0 if one of the related companies benefits from a tax incentive or has carried forward losses, and the TP adjustment would result in a change in the overall tax position?	<p>If one of the related parties in that transaction have tax incentives/ losses carried forward or huge unabsorbed capital allowance:</p> <ul style="list-style-type: none"> i. Those with only domestic controlled transactions; and ii. Transfer pricing adjustment will result in positive net tax impact <p>will be eligible for the SVDP 2.0.</p> <p>For example, the TP adjustment has resulted to an additional tax assessment of RM200,000 for Co. A and reduced tax assessment of RM150,000 for Co. B. In this situation, both Co. A and Co. B are eligible for SVDP since there is positive net tax impact of RM50,000 from the voluntary disclosure.</p> <p>Illustrative example is as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Description</th> <th style="text-align: center;">Co. A</th> <th style="text-align: center;">Co. B</th> </tr> </thead> <tbody> <tr> <td>Tax rate</td> <td style="text-align: center;">24%</td> <td style="text-align: center;">24%</td> </tr> <tr> <td>Tax payable</td> <td style="text-align: center;">200,000</td> <td style="text-align: center;">(150,000)</td> </tr> <tr> <td>Net tax impact</td> <td colspan="2" style="text-align: center;">50,000</td> </tr> </tbody> </table> <p>However, if the TP adjustment results in an additional assessment of RM70,000 for Co. A and reduced assessment amounting to RM100,000, both Co. A and Co. B are not eligible since the net tax impact of RM30,000 is negative. The illustration is as follows:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">Description</th> <th style="text-align: center;">Co. A</th> <th style="text-align: center;">Co. B</th> </tr> </thead> <tbody> <tr> <td>Tax rate</td> <td style="text-align: center;">24%</td> <td style="text-align: center;">24%</td> </tr> <tr> <td>Tax payable</td> <td style="text-align: center;">70,000</td> <td style="text-align: center;">(100,000)</td> </tr> <tr> <td>Net tax impact</td> <td colspan="2" style="text-align: center;">(30,000)</td> </tr> </tbody> </table>	Description	Co. A	Co. B	Tax rate	24%	24%	Tax payable	200,000	(150,000)	Net tax impact	50,000		Description	Co. A	Co. B	Tax rate	24%	24%	Tax payable	70,000	(100,000)	Net tax impact	(30,000)	
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**FREQUENTLY ASKED QUESTIONS (FAQ)
SPECIAL VOLUNTARY DISCLOSURE PROGRAMME 2.0
INLAND REVENUE BOARD OF MALAYSIA**

NO.	QUESTION	ANSWER
44.	Are taxpayers who are currently being audited eligible to participate in SVDP 2.0 for TP issues?	Taxpayers are not eligible to participate in SVDP 2.0 for any years of assessment where the audit / investigation has commenced.
45.	In which situation is the audit action considered to have been commenced?	The meaning of the commencement of audit action is as outlined in the Transfer Pricing Audit Framework in force.
46.	Taxpayers have made voluntary declarations for the TP issue for the assessment years 2020 and 2021. Will there be no audit / investigation action taken against the taxpayers for the years of assessment involved?	<p>Audit / investigation will not be carried out on the year of assessment in which the voluntary disclosure is made pertaining to TP issues.</p> <p>However, an audit / investigation can still be conducted for any non-transfer pricing issues for that year of assessment.</p>
J. CONTACT US		
47.	Who can I contact if I have any questions related to SVDP 2.0?	<p>Taxpayers can contact:</p> <p>a. HASiL Live Chat;</p> <p>b. HASiL Care Line at 03-89111000 / 603-89111100 (overseas); or</p> <p>c. Nearest IRBM service counter.</p>