

TECHNICAL

Direct Taxation

LHDNM MEDIA RELEASE: LATEST UPDATES ON LHDNM'S TRANSFER PRICING GUIDELINES 2012

The Inland Revenue Board of Malaysia (LHDNM) has issued a [media release](#) dated 24 July 2017 to inform that the Transfer Pricing Guidelines 2012 (TPG 2012) have been updated and uploaded on the LHDNM's official portal under the "[International Taxation](#)" category. Members may refer to our [e-CTIM TECH-DT 49/2017](#) dated 17 July 2017 on the updated version of the TPG 2012.

According to the media release, the effective date of the updated chapters (Chapter II – The Arm's Length Principle, Chapter VIII – Intangibles, Chapter X – Commodity Transactions, Chapter XI – Documentation) in the updated version of the TPG 2012 is **15 July 2017**.

The LHDNM has also uploaded other chapters in the updated version of the TPG 2012 as set out in the table below:

TPG 2012 (before update)	TPG 2012 (updated version)
Part I - Preliminary	Chapter I – Preliminary Note: Amendments have been made to the following paragraphs – - Para 3:2 - paragraph 25.4 (a), (d) and (e) only paragraph 11.2.4 (a), (c) and (d) of Chapter XI. - Para 3.3 - paragraph 25.2 paragraph 11.2.2 of Chapter XI.
Part V - Business Restructuring	Chapter V – Business Restructuring
Para 20 – Intragroup Services	Chapter VI – Intragroup Services
Para 21 – Cost Contribution Arrangement (CCA)	Chapter VII - Cost Contribution Arrangement (CCA)
Para 23 – Intragroup Financing	Chapter IX – Intragroup Financing

Further enquiries on the amendments may be directed to Encik Amir Zainuddin Abdul Hamid of the LHDNM at **03-8313 8888 ext 21206** or by email to lhdn_jcm@hasil.gov.my.

Members may read the media release at the websites of the [Institute](#) and the [LHDNM](#).

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