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**Chartered Tax Institute of Malaysia (225750-T)**

**e-CTIM TECH-DT 88/2020 15 December 2020**

**TO ALL MEMBERS**

**TECHNICAL**

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**Loans Guarantee Orders [P.U. (A) 24/2020, 54/2020, 240/2020, 265/2020, 276/2020, 279/2020]**

| **P.U. (A)** | **Remarks**  **(Please access the Orders for the full details)** |
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| 24/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200122_PUA%2024.pdf) | Remission of tax under Income Tax Act (“ITA”) 1967 and stamp duty  In relation to: -   * Sukuk Murabahah issued by Prasarana Malaysia Berhad of up to RM3.5 billion in nominal value; and * Sukuk Murabahah guarantee provided by the Malaysian Government.   With effect from  23 January 2020  Further details  See paragraph 3, 4 and 5 of the Order. |
| 54/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) (No. 2) Order 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200212_PUA54.pdf) | Remission of tax under ITA 1967 and stamp duty  In relation to: -   * Sukuk Murabahah issued by Malaysia Rail Link Sdn Bhd (“MRLSB”) and Syndicated Islamic Short Term Revolving Credit-i (“STRC-I”) Facility obtained by MRLSB of up to RM9.75 billion in combined aggregate; and * Sukuk Murabahah and STRC-i Facility guarantee provided by the Malaysian Government.   With effect from  13 February 2020  Further details  See paragraph 3 and 5 of the Order. |
| 240/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) (No. 3) Order 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200828_PUA2402020.pdf) | Remission of tax under ITA 1967 and stamp duty  In relation to: -   * Islamic Medium-Term Notes (“IMTN”) and Islamic Commercial Papers (“ICP”) issued by DanaInfra Nasional Berhad pursuant to the IMTN and ICP programme, and Syndicated Islamic Revolving Credit (“SFF-I”) Facility of up to RM10 billion in combined aggregate; * IMTN and ICP programme upsized up to RM71 billion; and * IMTN and ICP programme and SFF-i Facility guarantee given by the Malaysian Government.   With effect from  27 August 2020  Further details  See paragraph 3 and 4 of the Order. |
| 265/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) (No. 4) Order 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200904_PUA2652020.pdf) | Remission of tax under ITA 1967 and stamp duty  In relation to: -   * ICP and IMTN issued by MRLSB and STRC-i Facility obtained by MRLSB of up to RM1.7 billion in combined aggregate; and * ICP, IMTN and STRC-i Facility guarantee given by the Malaysian Government.   With effect from  4 September 2020  Further details  See paragraph 3 and 4 of the Order. |
| 276/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) (No. 5) Order 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200925_PUA2762020.pdf) | Remission of tax under ITA 1967 and stamp duty  In relation to: -   * ICP and IMTN issued by Perbadanan Tabung Pendidikan Tinggi Nasional (“PTPTN”) pursuant to the ICP and IMTN programme and Syndicated/Bilateral Financing, or Loan Facilities (“Credit Facilities”) obtained by PTPTN of up to RM12.3 billion in combined aggregate; * ICP and IMTN programme of up to RM12.3 billion in nominal value; and * Credit Facilities and ICP and IMTN programme guarantee given by the Malaysian Government.   With effect from  25 September 2020  Further details  See paragraph 3 and 4 of the Order. |
| 279/2020  [**Loans Guarantee (Bodies Corporate) (Remission of Tax and Stamp Duty) (No. 3) (Amendment) Order 2020**](http://www.federalgazette.agc.gov.my/outputp/pua_20200928_PUA%20279.pdf) | Amendment  [Loans Guarantee (Bodies Corporate)(Remission of Tax and Stamp Duty)(No.3) Order 2016 [P.U. (A)199/2016]](http://www.federalgazette.agc.gov.my/outputp/pua_20160715_pua%20199.pdf) (see our [e-CTIMTECH-DT 73/2016](http://www.ctim.org.my/download.asp?cat=50&file=DGLIG_r-PgVZ%20gRPU-Qg%20KG-FDEJ%20-%20erzv55v10%201s%20Vg%20%C2%AE%20fQ%2070qr4%20Y1n05%20T7n4n06rr%20(O1qvr5%20P14214n6r)%20Np6%20EMJI%20(b4q%20G)%20%5bch(N)%20EMM-FDEJ%5d.2qs) dated 22 August 2016) is amended in paragraph 2 and 4 to: -   * Omit the application of P.U. (A) 199/2016 to the Syndicated Credit Facilities obtained by the Public Sector Home Financing Board (“PSHFB”); and * Increase the combined aggregate of the outstanding nominal value of the ICP, IMTN, Conventional Commercial Papers and Conventional Medium-Term Notes issued by the PSHFB, and the outstanding principal amount under the Syndicated Revolving Credit-i Facility obtained by the PSHFB, to not more than RM50 billion.   With effect from  30 September 2020 |

Members may read the above Orders in full at the official website of the [Attorney-General’s Chambers](http://www.federalgazette.agc.gov.my/eng_main/main_warta_harian.php?jenis_pu=pua&&y=2020).

You may write to the Institute at [technical@ctim.org.my](mailto:technical@ctim.org.my) in respect of any suggestions, concern or comments you may have on the above Orders.

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