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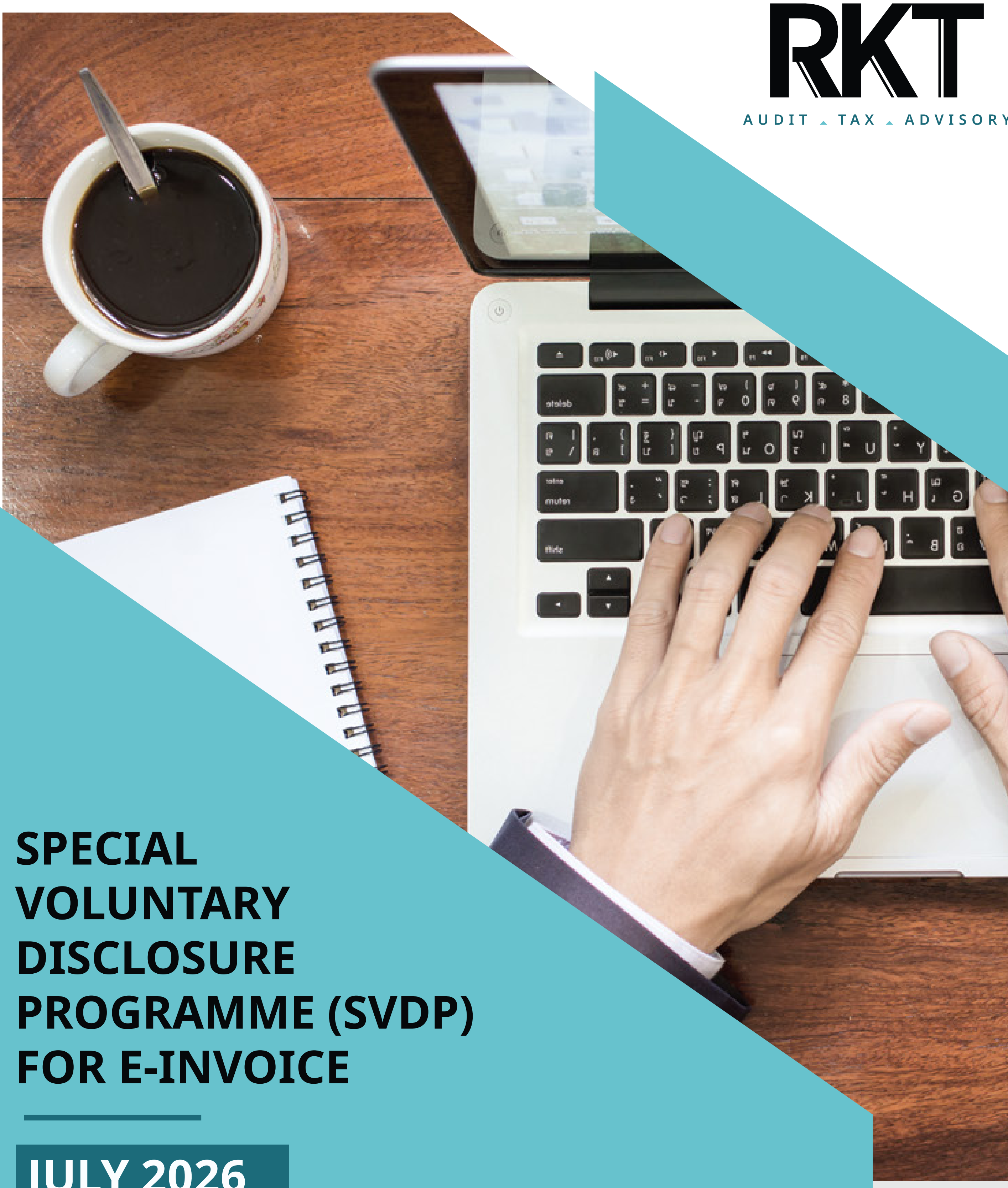

SPECIAL VOLUNTARY DISCLOSURE PROGRAMME (SVDP) FOR E-INVOICE

JULY 2026

Your trusted business partner:
Audit, Tax and Advisory

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Following the recent SVDP announcement for e-Invoice (until **31 December 2027**), the IRBM has published the following in July 2026 (can be downloaded HERE): -

General Guideline 4.7
(replacing General Guideline 4.6)

Specific Guideline 4.8
(replacing Specific Guideline 4.7)

Recap of E-Invoice Mandatory Implementation Timeline and Corresponding Interim Relaxation Period

Phase	Taxpayers with an annual turnover or revenue (*)	Implementation Date	Interim Relaxation Period
1	More than RM100 million	1 August 2024	1 August 2024 to 31 January 2025
2	More than RM25 million and up to RM100 million	1 January 2025	1 January 2025 to 30 June 2025
3	More than RM5 million and up to RM25 million	1 July 2025	1 July 2025 to 31 December 2025
4	Up to RM5 million	1 January 2026	Extended to **31 December 2027** (from 31 December 2026)

(*) Based on annual turnover or revenue for FY 2022.

SVDP for E-Invoice

The IRBM's media release regarding the SVDP for e-Invoice (only available in national language) can be downloaded from the IRBM's website.

Key Features of SVDP for E-Invoice

Areas	Key Takeaways
SVDP Period	7 July 2026 to **31 December 2027**.
Eligible Taxpayers	▪ Taxpayers who have not submitted or missed out submitting e-Invoices for any period since their respective *mandatory implementation timeline*. ▪ Taxpayers whose submitted e-Invoices contain errors or information that does not comply with the specifications and requirements under the relevant tax legislation and guidelines. ▪ Taxpayers who have not submitted any e-Invoices for any period or transaction since their *mandatory implementation timeline*. ▪ Taxpayers who are currently being reviewed by the IRBM under the e-Invoice audit (i.e. compliance review) or have been notified of the audit.
Relief Granted	▪ No compliance review and enforcement actions (e.g. penalties and prosecution actions) for e-Invoices disclosed under the SVDP (subject to conditions).
Conditions	▪ Voluntary disclosure must be made in good faith and in accordance with IRBM's requirements. **Note:** Taxpayers remain responsible for ensuring that the disclosure made is accurate and in accordance with IRBM's requirements. ▪ **Consolidated e-Invoices** to be regularised under the SVDP must be submitted by transactional month (not aggregated across multiple months). **Illustration -** For transactions undertaken from January 2026 to April 2026 (4 months), where no consolidated e-Invoices have been submitted previously, for the purposes of SVDP, the taxpayer is required to submit four (4) separate consolidated e-Invoices (i.e. one consolidated** e-Invoice for each transactional month), instead of one single consolidated e-Invoice for the 4 transactional months. ***Provided no transactional e-Invoice request from buyers.*

Key Features of SVDP for E-Invoice (Cont'd)

Areas	Key Takeaways
Conditions (Cont'd)	▪ SVDP **does not apply** where: - • e-Invoices submitted under the SVDP do not comply with the specifications and requirements under the relevant tax legislation and guidelines. • voluntary disclosure involves fraud, wilful default or negligence.
E-Invoice Versions	▪ Designated e-Invoice versions for SVDP purposes: - • SVDP 1.2 (**without** digital signature); or • SVDP 1.3 (**with** digital signature). **Note:** Versions SVDP 1.2 and 1.3 shall only be used for SVDP purposes and are not meant for submission of e-Invoices outside the SVDP.

What Businesses Should Do?

Immediate Priority	Practical Considerations (Not Exhaustive)
(1) Undertake a **gap assessment / targeted e-Invoice health check**	• Review the current invoicing and purchasing processes / business scenarios (e.g. cross border, B2B, B2C) that are subject to e-Invoicing requirements. • Identify gaps in the availability and quality of data (e.g. customers' and suppliers' data) against IRBM's requirements. • Evaluate whether the relevant e-Invoices have been generated and submitted within the applicable prescribed timeline.
(2) Evaluate **SVDP applicability and potential exposure**	• Identify any missing or incorrect submission since the mandatory implementation timeline. • Quantify potential penalty exposure. • Identify areas for regularisation under the SVDP.

Future Actions (Recommended within 3 months)	Practical Considerations (Not Exhaustive)
(3) **Embed** e-Invoice requirements **into business process**	• Enhance internal controls / workflows / SOPs to ensure all e-Invoices are generated in accordance with IRBM's requirements and submitted within the applicable due dates. • Enhance e-Invoice ownership and accountability across functions (e.g. finance, operation, procurement, human resource, tax) and keep tabs of any e-Invoice development. • Revisit the e-Invoice submission model (e.g. MyInvois Portal, direct integration, middleware) and establish a backup plan to cater to unforeseen circumstances (e.g. the system is down).
(4) Prepare for **audit readiness**	• Maintain proper documentation to support e-Invoice positions taken. • Ensure your stakeholders (e.g. customers, suppliers, employees) are made aware of their roles and responsibilities, relevant e-Invoice updates post-implementation and non-compliance consequences. • Where uncertainties arise, consider approaching your tax advisors to ensure compliance.

How We Can Assist

We have supported businesses across industries in implementing e-Invoice, conducting e-Invoice gap assessment / targeted health checks and managing submissions via the MyInvois portal.

If you would like us to perform a preliminary review of your exposure or assess your SVDP eligibility, we would be pleased to discuss further on how to support you in this area.

Glossary for Reference

Abbreviations / Acronyms	Descriptions
B2B	Business-to-Business
B2C	Business-to-Consumer
FY	Financial Year
General Guideline 4.7	E-Invoice General Guideline (Version 4.7) dated 7 July 2026
General Guideline 4.6	E-Invoice General Guideline (Version 4.6) dated 7 December 2025
IRBM	Inland Revenue Board of Malaysia
SOP	Standard Operating Procedure
Specific Guideline 4.8	E-Invoice Specific Guideline (Version 4.8) dated 7 July 2026
Specific Guideline 4.7	E-Invoice Specific Guideline (Version 4.7) dated 20 April 2026
SVDP	Special Voluntary Disclosure Programme

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