

EY Tax Alert (Special edition)

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e-Invoice Special Voluntary Disclosure Program (SVDP) from 7 July 2026 to 31 December 2027

Coverage of this alert

- [Overview](#)
- [Key considerations for businesses](#)
- [What actions should businesses consider?](#)

The Inland Revenue Board of Malaysia (IRBM), through its media release dated 7 July 2026, has introduced the e-Invoice Special Voluntary Disclosure Program (SVDP), effective from 7 July 2026 to 31 December 2027. The SVDP is also reflected in updated Guidelines.

We highlight below the key features of the e-Invoice SVDP and what businesses need to know to benefit from the program.

Overview

- Based on the updated e-Invoice Specific Guideline (Version 4.8) on 7 July 2026, the e-Invoice SVDP applies to the following categories of taxpayers:
 - a) Taxpayers who have not submitted or have missed out in submitting e-Invoices for any period commencing from their mandatory e-Invoice implementation date.
 - b) Taxpayers who have submitted e-Invoices, but the e-Invoices contain errors or information that do not comply with the specifications or requirements prescribed under the relevant tax legislation, e-Invoice Guideline and / or e-Invoice Specific Guideline.
 - c) Taxpayers who have not submitted any e-Invoices for any period or transaction commencing from their mandatory e-Invoice implementation date.
 - d) Taxpayers who are currently undergoing or have been notified by the IRBM that they will be undergoing an e-Invoice compliance review.



- The IRBM will not undertake e-Invoice compliance reviews and enforcement actions in respect of the e-Invoices voluntarily disclosed under the e-Invoice SVDP, provided that such e-Invoices comply with the specifications and requirements prescribed under the relevant tax legislation, e-Invoice Guideline and e-Invoice Specific Guideline. This concession is not available where the voluntary disclosure involves fraud, willful default or negligence.
- Currently, Taxpayers that implement e-Invoicing in accordance with the prescribed timeline, comply with the e-Invoice requirements and do not utilise certain implementation flexibilities provided by the IRBM may claim accelerated capital allowance (ACA) on qualifying information, communication and technology equipment and customised software development costs for e-Invoice implementation. The existing ACA allows the expenditure to be written off over two years. Under the latest announcement, the Government proposes to further enhance the incentive by allowing the full capital allowances to be claimed in a single year.

Key considerations for businesses

- For e-Invoices voluntarily disclosed or submitted under the e-Invoice SVDP, taxpayers are required to indicate the following in the “e-Invoice version” data field:
 - a) “SVDP 1.2” (for e-Invoices submitted without a digital signature).
 - b) “SVDP 1.3” (for e-Invoices submitted with a digital signature).

The above identifiers distinguish e-Invoices submitted under the e-Invoice SVDP from those submitted outside the program.

- Consistent with the existing e-Invoice requirements, for voluntary disclosure of consolidated e-Invoices not previously submitted, taxpayers are required to submit the consolidated e-Invoices according to the respective months of the underlying transactions. Submission of a single consolidated e-Invoice covering multiple months on a lump sum basis is not permitted.
- Except for transactions undertaken during the interim relaxation period, any transaction exceeding RM10,000 (on or after 1 January 2026) that was not previously reported via a transactional e-Invoice can be regularized under the e-Invoice SVDP through the issuance of a transactional e-Invoice.



What actions should businesses consider?

- **Conduct e-Invoice “health check”**

Businesses should assess their current level of e-Invoice compliance and review any e-Invoice positions previously adopted to identify potential compliance gaps. Where such gaps are identified, businesses should consider leveraging the e-Invoice SVDP to regularize their compliance position.

- **Review accuracy and completeness of submitted e-Invoices**

Businesses should reconcile information reported in e-Invoices against their accounting records and other relevant financial data to validate the completeness and accuracy of e-Invoice reporting, particularly where multiple accounting or enterprise systems are used.

- **Update “e-Invoice Version” data field in the system**

Businesses seeking to regularize their e-Invoice compliance position under the e-Invoice SVDP should have the “e-Invoice Version” data field updated with the appropriate identifier, namely “SVDP 1.2” (without a digital signature) or “SVDP 1.3” (with a digital signature).

- **Strengthen record-keeping and tracking procedures**

Where e-Invoices are issued under the e-Invoice SVDP to regularize previously unsubmitted or incorrectly submitted transactions, businesses should maintain a clear audit trail and separately track such e-Invoices so that the issuance of those e-Invoices does not result in duplicate recognition of the underlying revenue or expense in their accounting records or financial statements. Businesses should also take appropriate steps to rectify the same issues on a going-forward basis.

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