Citi Entities in Malaysia ("Citi Malaysia") Customer Data Collection FAQ

Updated as of 24 January 2025

No	Scope	Questions	Answers
1	Overview	What is e-Invoice?	An e-Invoice is a digital representation of a transaction between a supplier and a buyer. e-Invoice replaces paper or electronic documents such as invoices, credit notes, debit notes, and refund note. An e-Invoice contains the same essential information as traditional document, for example, supplier's and buyer's details, item description, quantity, price excluding tax, tax, and total amount, which records transaction data for daily business operations.
2	Overview	What are the scenarios requiring e-Invoice to be issued?	a) **Proof of income**: This document is issued whenever a sale or other transaction is made to recognise income of taxpayers; and b) **Proof of Expense**: This type of document covers purchases made or other spending by taxpayers. It also includes returns and discounts. It can also be used to correct or subtract an income receipt in terms of the amounts documented. In addition, there are certain circumstances where taxpayers would have to issue self-billed e-Invoice to document an expense such as foreign transactions.
3	Overview	In what scenarios will a counterparty require an e-Invoice?	These scenarios may include the following but are not limited to: i. **Tax Deduction Claims:** The e-Invoice serves as a proof of income/expense to support tax deduction claims. These may include health insurance premiums, mortgage insurance premiums, business expenses and more. ii. **Customer Preference:** Some customers prefer e-Invoice for their convenience and ease of storage and retrieval. iii. **Reimbursement and Expense Reporting:** Employees who incur expenses on behalf of their employers often may require e-Invoice to request reimbursement. iv. **Contractual Agreements:** e-Invoice may be required as part of contractual agreements between parties, particularly for business-to-business (B2B) transactions. v. **Audits and Compliance:** Proper documentation to demonstrate compliance with applicable laws/regulations may be required during audit reviews.
4	Overview	Is e-Invoicing applicable to transactions in Malaysia only?	No, e-Invoice is applicable to both domestic and cross-border transactions (i.e., a transaction between a Malaysian buyer and a foreign supplier and vice versa). The cross-border transactions include import and export activities as below: i. Goods sold or services rendered by Foreign Seller (Supplier) to Malaysian Purchaser (Buyer); and ii. Goods sold or services rendered by Malaysian Seller (Supplier) to Foreign Purchaser (Buyer).

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5	Overview	Are government entities exempted from e-Invoicing?	As per Section 1.6.1(c) of the e-Invoice Guidelines v4.0, government entities are exempted from issuing e-Invoice. However, Citi Malaysia is still required to issue e-Invoice to the government agencies that they transact business with.
6	Overview	What are the different types of e-Invoice that can be issued?	a) **e-Invoice** - Records a transaction between a "Buyer" and a "Supplier", including the issuance of a self-billed e-Invoice to document an expense. b) **e-Credit Note** - Issued by Suppliers to correct errors, apply discounts or account for returns in a previously issued e-Invoice with the purpose of reducing the value stated in the original e-Invoice. c) **e-Debit Note** - Issued to indicate additional charges on a previously issued e-Invoice. d) **e-Refund Note** - Issued by the Supplier to confirm the refund of the Buyer's payment. This is used specifically for when there is a return of monies to the Buyer.
7	Overview	What is a self-billed e-Invoice?	A self-billed e-Invoice is issued by the Buyer (instead of the Supplier) for the following transactions: i. Payment to agents, dealers, distributors ii. Goods sold or services rendered by foreign suppliers iii. Profit distribution (e.g., dividend distribution) iv. Electronic commerce ("e-commerce") transactions v. Pay-out to all betting and gaming winners vi. Transactions with individuals (who are not conducting a business) (applicable only if the other self-billed circumstances are not applicable) vii. Interest payment, except: a) Businesses (e.g., financial institutions, etc.) that charge interest to public at large (regardless businesses or individuals); b) Interest payment made by employee to employer; and c) Interest payment made by foreign payor to Malaysian taxpayers. viii. Claim, compensation or benefit payments from the insurance business of an insurer.
8	Overview	What is the difference between a normal e-Invoice and a self-billed e-Invoice?	a) The normal e-Invoice is issued by the Supplier as proof of income to substantiate a particular transaction for tax purposes. b) On the other hand, the self-billed e-Invoice is issued by the Buyer and assumes the role of the Supplier for submission to *Lembaga Hasil Dalam Negeri Malaysia* ("LHDN") for validation. This would allow the Buyer to use the validated self-billed e-Invoice as proof of expense for tax purposes. Moreover, it is important to highlight that in these scenarios, the Supplier is no longer required to issue an e-Invoice where a self-billed e-Invoice has already been issued by the Buyer for the particular transaction.
9	Overview	What is the difference between standalone e-Invoice	a) **Standalone e-Invoice:**

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		and consolidated e-Invoice?	i. A standalone e-Invoice is an e-Invoice issued in the name of the requesting counterparty. The e-Invoice only contains the details of the specific counterparty's transactions with Citi Malaysia. ii. However, standalone e-Invoice will only be issued upon customer's request on the condition that all required information is provided by the customer. b) **Consolidated e-Invoice:** i. To assist the Suppliers in complying with e-Invoice requirements and to reduce the burden to both Suppliers and Buyers, the LHDN has allowed Suppliers to consolidate the transactions with Buyers who do not require an e-Invoice into a consolidated e-Invoice on a monthly basis.
10	Overview	What are the consequences for not issuing e-Invoice?	Failure to issue e-Invoice is an offence under Section 120(1)(d) of the Income Tax Act 1967, and will result in a fine of not less than RM200 and not more than RM20,000 or imprisonment not exceeding 6 months or both, for each non-compliance.
11	Overview	Which Citi Malaysia customers will receive e-Invoice?	Entities (Sole Proprietorships, Sdn. Bhd., Bhd., Partnerships, Associations, etc.): It is mandatory for e-Invoice document to be issued to this category of customers beginning 1 July 2025. **Exemptions:** To refer to Section 1.6 of the Inland Revenue Board of Malaysia ("IRBM") e-Invoice Guideline (version 4) for the complete list of exemptions. https://www.hasil.gov.my/en/e-invoice/guidelines/
12	Overview	When will Citi Malaysia begin issuing e-Invoice?	**For entities required to comply by 1 July 2025 (originally 1 August 2024):** i. Citibank Berhad ii. Citigroup Transaction Services (M) Sdn. Bhd. iii. Citibank, N.A., Labuan Branch 1. Following the announcement by LHDN regarding the implementation of e-Invoice, e-Invoice for the above Citi Malaysia will be implemented in a phased approach. The above Citi Malaysia will issue consolidated e-Invoice for transaction(s) taking place from 1 August 2024 to 30 June 2025. 2. Customers will not receive any e-Invoice from the above Citi Malaysia for transaction(s) taking place from the above-mentioned period. However, they may leverage existing documentation issued by the above Citi Malaysia to serve as proof of transaction, income, or expense. 3. Starting 1 July 2025, the above Citi entities will begin to issue e-Invoice to the Customers who opt to receive the same. However, it will only be issued after receipt of all required and completed information and consent from the customers within the time stipulated by the above Citi Malaysia.

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			For entities required to comply by 1 January 2026 (Originally 1 July 2025): i. Citigroup Global Markets Malaysia Sdn. Bhd.
13	Data & Information	What type of information is Citi Malaysia requesting?	The information requested from Citi Malaysia are: i. Entity Full Name as per registration ii. Business Registration Number (“BRN”) iii. Tax Identification Number (“TIN”) iv. Sales Tax / Service Tax (“SST”) Registration Number v. Address for LHDN e-Invoicing purposes vi. Contact Number for LHDN e-Invoicing purpose vii. Email Address for LHDN e-Invoicing purpose viii. Customer Consent for issuance of e-Invoice
14	Data & Information	What will the information be used for?	To ensure that Citi Malaysia will be able to issue a standalone e-Invoice for its customers.
15	Data & Information	What would happen if the customer provides incorrect/incomplete information to Citi Malaysia?	For Citi Malaysia to issue e-Invoice, customers must provide complete and accurate information. Citi Malaysia cannot issue e-Invoice until all the required and accurate information is provided by the customers. Customers are responsible for ensuring that all information provided is true, accurate, and up to date in all respects and contains no omission or misleading information as of the date of provision.
16	Data & Information	How would a customer obtain their Tax Identification Number? (TIN)	**For customers currently registered with LHDN:** **Option 1**: Visit the LHDN E-Daftar Portal https://mytax.hasil.gov.my/ezHasil?data=eDaftar&id=ezHasil%20sebelum **Option 2**: Visit your nearest LHDN branch or contact LHDN via the following channels https://www.hasil.gov.my/en/contact-us/ **Option 3 (For Individuals under Employment/Individuals Who Carries on Business)**: Kindly refer to respective Income Tax Return Form BE/B **For customers currently not registered with LHDN:** To register online or in person at your nearest LHDN branch. Please refer to https://www.hasil.gov.my/en/individual/individual-lifecycle/registration/ or https://www.hasil.gov.my/en/company/tax-file-registration/ for further information.
17	Data & Information	How would a customer obtain their Sales & Service Tax (“SST”) number?	For customers that are registered for Sales & Service Tax (“SST”), please visit the Royal Malaysian Customs Department (“RMCD”) portal on SST https://sst01.customs.gov.my/account/inquiry , or contact the RMCD SST Helpdesk via this link https://mysst.customs.gov.my/CallCenterHelpDesk
18	Data & Information	Will old Business Registration Number	a) LHDN has confirmed that only the new BRN format will be accepted for e-Invoice purposes.

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		(“BRN”) format be accepted?	b) Moreover, LHDN has also confirmed that Suppliers may input “NA” with the assigned TIN for unit trusts, fund-level entities and other body persons that do not have a BRN as a result of not being registered under the Companies Commission of Malaysia (“CCM”).
19	Data & Information	What is the purpose of customer consent to receiving e-Invoice?	Customer consent indicates if the customer would like to receive e-Invoices issued under their name from Citi Malaysia.
20	Data & Information	What if customers decide to change their preference?	It is advised for the customer to reach out to their Relationship Manager/point-of-contact in relation the transaction(s) to have their preference updated.
21	Data & Information	What does LHDN validate in their e-Invoice?	LHDN validation includes a series of checks to ensure the e-Invoice submitted to LHDN conforms to the e-Invoice format and data structure as specified by LHDN. Refer to section 2.4.3 of the e-Invoice Guideline v4.0 for details.
22	Data & Information	Does LHDN allow editing of data after submission of e-Invoice?	No, the supplier would need to cancel the e-Invoice within 72 hours from time of validation and reissue a new e-Invoice. Any changes after 72 hours from time of validation would require the supplier to issue a new e-Invoice (i.e., debit note, credit note, refund note e-Invoice) to adjust the original e-Invoice issued. Thereafter, a new e-Invoice would be required to be issued accordingly.
23	Data & Information	How long does it take for LHDN to validate an e-Invoice?	The e-Invoice validation by LHDN will be done in near real-time. However, this will also demand on the amount of traffic that LHDN is currently facing at the time of submission.