

---

UNIVERSITI SAINS MALAYSIA

Peperiksaan Kursus Semasa Cuti Panjang  
Sidang Akademik 2007/2008

June 2008

**ACW391 – Advanced Taxation**  
***[Percukaian Lanjutan]***

Duration: 3 hours  
*[Masa: 3 jam]*

---

Please check that this examination paper consists of **TWENTY** pages of printed material before you begin the examination.

*[Sila pastikan bahawa kertas peperiksaan ini mengandungi **DUA PULUH** muka surat yang bercetak sebelum anda memulakan peperiksaan].*

**Instruction:** Answer **ALL** questions.

**Arahan:** Jawab **SEMUA** soalan].

Question 1 (20 marks)

- (a) Syarikat Rambut Cantik Sdn Bhd intends to import shampoo from Paris at a cost of:

|                     |          |
|---------------------|----------|
| Cost of the shampoo | € 20,000 |
| Insurance paid      | € 1,500  |
| Freight charges     | € 4,500  |

The import duty on the said goods is 30% and the rate of sales tax is 10%. The exchange rate is €1 = RM3.00.

**Required:**

Advise Syarikat Rambut Cantik Sdn Bhd on:

- (i) the amount of import duty and sales tax payable; and
- (ii) the penalties for late payment of sales tax.

[ 4 marks ]

- (b) Perkhidmatan Korporat Rahman Sdn Bhd (PKR), a company based in Pulau Pinang, carries on the business of providing tax and corporate consultancy services. PKR is a taxable person for service tax purposes.

In providing corporate consultancy services to its client, Abu Bhd, PKR sought legal opinion from Amin & Co. For the legal advice, PKR received an invoice totaling RM1,000 (inclusive of service tax).

PKR's consultancy fees amounted to RM5,000 and out-of-pocket expenses incurred by PKR include the following:

|                    |            |
|--------------------|------------|
|                    | <u>RM</u>  |
| Travelling         | 200        |
| Photostatting      | 50         |
| Postage/fax charge | <u>30</u>  |
|                    | <u>280</u> |
|                    | ===        |

**Required:**

- (i) Prepare the invoice to be issued by PKR to its client, Abu Bhd., showing all charges, including the amount invoiced by Amin & Co.
- (ii) Explain the conditions for a refund of sales tax or service tax on bad debts.

[ 8 marks ]

- (c) On 1 January 2007, Johan Sdn. Bhd., a cloth manufacture, was licensed under the Sales Tax Act 1972. For the first sales tax period, RM2,000,000 worth of cloth was sold. 40% of the sales was sold to holders of Borang S.T. No.5 (C.J.No.5); 20% was exported by the company and RM100,000 was donated to approved bodies. The rate of tax is 10%.

Owing to the negligence of the company's employees, Borang S.T. No.3 (C.J.3) for the first tax period was only forwarded on 29 March 2007.

**Required:**

- (i) Compute the sales tax payable for first sales tax period;
- (ii) When is sales tax charged and payable?
- (iii) Compute the mandatory penalty chargeable because of late payment of sales tax.
- (iv) State an error which is committed by the company.

[ 8 marks ]

Soalan 1 (20 markah)

- (a) *Syarikat Rambut Cantik Sdn Bhd merancang untuk mengimport shampoo dari Paris pada kos berikut:*

|                       |         |
|-----------------------|---------|
| <i>Kos shampoo</i>    | €20,000 |
| <i>Insurans</i>       | € 1,500 |
| <i>Caj perjalanan</i> | € 4,500 |

*Duti import berkenaan ialah @ 30% dan kadar cukai jualan ialah 10%. Kadar pertukaran wang asing ialah €1 = RM3.00.*

**Dikehendaki:**

*Nasihatkan Syarikat Rambut Cantik Sdn Bhd mengenai:*

- (i) *amaun duti import dan cukai jualan kena dibayar; dan*
- (ii) *denda yang akan dikenakan jika lewat bayar cukai jualan.*

[ 4 markah ]

- (b) *Perkhidmatan Korporat Rahman Sdn Bhd (PKR), sebuah syarikat di Pulau Pinang, menjalankan perniagaan perkhidmatan perunding cukai dan koporat. PKR adalah orang bercukai (taxable person) untuk tujuan cukai perkhidmatan.*

*Untuk memberikan perkhidmatan perunding kepada pelanggannya Abu Bhd, PKR telah mendapatkan nasihat guaman daripada Amin & Co. Untuk nasihat guaman tersebut, PKR diinboiskan sebanyak RM1,000 (termasuk cukai perkhidmatan).*

...4/-

Yuran perkhidmatan perunding PKR ialah RM5,000 dan belanja tambahan berikut telah dibayar olehnya:

|                |           |
|----------------|-----------|
|                | <u>RM</u> |
| Perjalanan     | 200       |
| Fotostat       | 50        |
| Setem/caj faks | <u>30</u> |
|                | 280       |
|                | ====      |

**Dikehendaki:**

- (i) Sediakan inbois yang dikeluarkan oleh PKR kepada pelanggannya Abu Bhd., dengan menunjukkan semua caj termasuk amaun yang diinboiskan oleh Amin & Co.
- (ii) Terangkan syarat-syarat untuk pulangan cukai jualan atau cukai perkhidmatan ke atas hutang lapuk.

[ 8 markah ]

- (c) Pada 1 Januari 2007, Johan Sdn. Bhd., pekilang kain, dilesenkan di bawah Akta Cukai Jualan 1972. Untuk tempoh cukai jualan pertama, kain bernilai RM2,000,000 telah dijual. 40% jualan berkenaan telah dijual kepada pemegang Borang S.T. No.5 (C.J.No.5); 20% telah diekspot oleh syarikat dan RM100,000 telah didermakan kepada badan yang diluluskan. Kadar cukai ialah 10%.

Oleh kerana kelalaian pekerja syarikat, Borang S.T. No.3 (C.J.3) untuk tempoh cukai jualan pertama hanya dikemukakan pada 29 Mac 2007.

**Dikehendaki:**

- (i) Kirakan cukai jualan yang dikenakan dan harus dibayar bagi tempoh cukai jualan pertama.
- (ii) Bilakah cukai jualan harus dikenakan dan dibayar?
- (iii) Kirakan penalti mandatori yang dijatuhkan kerana bayaran lambat.
- (iv) Nyatakan satu kesalahan yang telah dilakukan oleh syarikat.

[ 8 markah ]

Question 2 (20 marks)

The Gelugor Co-operative Society ('GCS') has been registered as a co-operative society for ten years. In addition to providing support to its members, GCS runs a bookshop which is funded by members, and is open to the public. The audited accounts for the three years to 30 June 2007 contain the following information:

| Revenue account - years ended 30 June             | <u>2005</u> | <u>2006</u> | <u>2007</u> |             |
|---|-------------|-------------|-------------|-------------|
| <i>Income:</i>                                    | RM          | RM          | RM          |             |
| Bookshop net profit/(loss)                        | (15,000)    | 13,000      | 38,500      |             |
| Malaysian taxed dividends – gross                 | 60,000      | 105,000     | 100,000     |             |
| Net rent from property                            | 5,000       | 25,900      | 26,300      |             |
| <i>Expenditure:</i>                               |             |             |             |             |
| Cash gift to an approved organization             | (2,000)     |             | (1,300)     |             |
| <i>Audited net profit</i>                         | 48,000      | 143,900     | 163,500     |             |
| Dividends paid to GSC members during the year     |             | (19,000)    | (18,000)    |             |
| Contribution to Co-operative Education Trust Fund | (8,000)     | (14,900)    | (19,100)    |             |
| Transfer to statutory reserve fund                | (5,000)     | (35,000)    | (20,000)    |             |
| Retained profit before tax                        | 35,000      | 75,000      | 106,400     |             |
| <br>  |             |             |             |             |
| Balance sheet at 30 June                          | <u>2004</u> | <u>2005</u> | <u>2006</u> | <u>2007</u> |
|   |             | RM          | RM          | RM          |
| Total assets were represented by:                 | 800,000     | 920,000     | 1,152,000   | 1,296,400   |
| Paid up share capital                             | 500,000     | 600,000     | 600,000     | 600,000     |
| Subscribed capital                                |             |             | 50,000      | 50,000      |
| Share premium account                             | 50,000      | 50,000      | 50,000      | 50,000      |
| Statutory reserve fund                            | 30,000      | 35,000      | 70,000      | 90,000      |
| Unappropriated profit                             | 100,000     | 135,000     | 210,000     | 316,400     |
| Members' savings accounts                         | 70,000      | 80,000      | 100,000     | 130,000     |
| Members' loan accounts                            | 50,000      | 50,000      | 72,000      | 60,000      |
|   | 800,000     | 950,000     | 1,152,000   | 1,296,400   |

The following additional information is provided:

- No tax adjustments need to be made to the bookshop net profit/loss and there are no other losses or capital allowances to be taken into account.
- Tax was suffered by deduction at source on dividends received at 28% in each year.
- Rents are not treated as business income for tax purposes.

**Required:**

- (a) Determine whether the income tax exemption available to co-operative societies applies to GCS on the facts given above and, if so, for which years of assessment. State your reasons and show details of any supporting calculations.

[ 5 marks ]

- (b) Starting with bookshop net profits, where relevant, compute the chargeable income and the amount of income tax payable or repayable for each year of assessment concerned. State the year of assessment in each case.

[ 15 marks ]

Soalan 2 (20 markah)

*Pertubuhan Koperasi Gelugor (Gelugor Co-operative Society 'GCS') telah ditubuhkan sebagai pertubuhan koperasi selama sepuluh tahun. Selain dari memberi sokongan kepada ahlinya, GCS juga menjalankan sebuah kedai buku yang disumbangkan oleh ahlinya. dan dibuka kepada orang awam. Akaun diaudit bagi tiga tahun sehingga 30 Jun 2007 mengandungi maklumat berikut:*

| <i>Akaun hasil – tahun-tahun berakhir 30 Jun</i>         | <u>2005</u> | <u>2006</u> | <u>2007</u> |
|--|-------------|-------------|-------------|
| <i>Pendapatan:</i>                                       | <i>RM</i>   | <i>RM</i>   | <i>RM</i>   |
| <i>Untung bersih(rugi) kedai buku</i>                    | (15,000)    | 13,000      | 38,500      |
| <i>Dividen Malaysia – kasar</i>                          | 60,000      | 105,000     | 100,000     |
| <i>Sewa bersih dari hartanah</i>                         | 5,000       | 25,900      | 26,300      |
| <i>Perbelanjaan:</i>                                     |             |             |             |
| <i>Derma tunai kepada organisasi diluluskan</i>          | (2,000)     |             | (1,300)     |
| <i>Untung bersih diaudit</i>                             | 48,000      | 143,900     | 163,500     |
| <i>Dividen dibayar kepada ahli GCS pada tahun semasa</i> |             | (19,000)    | (18,000)    |
| <i>Sumbangan kepada Dana Pendidikan Koperasi</i>         | (8,000)     | (14,900)    | (19,100)    |
| <i>Pindahan ke dana resab statutori</i>                  | (5,000)     | (35,000)    | (20,000)    |
| <i>Untung tertahan sebelum cukai</i>                     | 35,000      | 75,000      | 106,400     |

| <i>Kunci kira-kira pada 30 Jun</i> | <u>2004</u> | <u>2005</u> | <u>2006</u> | <u>2007</u> |
|------------------------------------|-------------|-------------|-------------|-------------|
|                                    |             | <i>RM</i>   | <i>RM</i>   | <i>RM</i>   |
| <i>Jumlah aset diwakili oleh:</i>  | 800,000     | 920,000     | 1,152,000   | 1,296,400   |
| <i>Modal saham berbayar</i>        | 500,000     | 600,000     | 600,000     | 600,000     |
| <i>Modal disumbangkan</i>          |             |             | 50,000      | 50,000      |
| <i>Akaun premium saham</i>         | 50,000      | 50,000      | 50,000      | 50,000      |

|                             |         |         |           |           |
|-----------------------------|---------|---------|-----------|-----------|
| <i>Dana resab statutori</i> | 30,000  | 35,000  | 70,000    | 90,000    |
| <i>Untung belum diagih</i>  | 100,000 | 135,000 | 210,000   | 316,400   |
| <i>Akaun simpanan ahli</i>  | 70,000  | 80,000  | 100,000   | 130,000   |
| <i>Akaun pinjaman ahli</i>  | 50,000  | 50,000  | 72,000    | 60,000    |
|                             | 800,000 | 950,000 | 1,152,000 | 1,296,400 |

Informasi tambahan berikut diberikan:

1. *Tiada pelarasan diperlukan untuk untung bersih/rugi kedai buku dan tiada kerugian dan tiada pelarasan.*
2. *Cukai dikurangkan dengan potongan pada asal ke atas dividen yang diterima pada kaedar 28% untuk setiap tahun.*
3. *Sewa tidak diambilkira sebagai pendapatan perniagaan untuk tujuan percukaian.*

**Dikehendaki:**

- (a) *Tentukan samada pengecualian cukai pendapatan untuk pertubuhan koperasi diaplikasikan kepada GCS berasaskan kepada fakta yang diberikan di atas, dan jika ya, untuk mana-mana tahun-tahun taksiran. Nyatakan alasan anda dan tunjukkan butir-butir pengiraan sokongan.*

[ 5 markah ]

- (b) *Bermula dengan untung bersih kedai buku, di mana relevan, kirakan pendapatan bercukai dan amaun cukai kena dibayar atau kena dibayar semula untuk setiap tahun taksiran berkenaan. Nyatakan tahun taksiran dalam setiap kes.*

[ 15 marks ]

**Question 3 (20 marks)**

- (a) Explain how incomes derived from Malaysia are exempted from income tax for the following entities:
- (i) Real Properties Investment Trusts (REITS).
  - (ii) Cooperatives.

[ 8 marks ]

- (b) First-REIT, a real estate investment trust approved by the Securities Commission, commenced operations on 1 April 2006 and prepares its accounts to 31 March annually. The income and expenditure statement for the year ended 31 March 2007 is as follows:

|   | RM'000 |
|---|--------|
| Rental income from Malaysian properties | 5,000  |
| Malaysian dividend income (gross)       | 3,000  |
| Interest income from Malaysia           | 2,000  |
|   | 10,000 |
| Expenses (assume all deductible)        | 4,500  |
|   | 5,500  |

On 2 Mac 2007, First-REIT distributed an amount of RM5,000,000 to the unit-holders comprising of:

- (i) 20% non-resident individuals;
- (ii) 30% resident companies; and
- (iii) 50% non resident institutional investors.

**Required:**

- (a) Compute the tax payable/repayable by First-REIT for year of assessment 2007;
- (b) Compute the tax payable of the following unit holders for year of assessment 2007:
  - (i) Non resident individuals.
  - (ii) Resident companies.
  - (iii) Non resident institutional investors.

[ 12 marks ]

Soalan 3 (20 markah)

(a) Terangkan bagaimana pendapatan yang dihasilkan daripada Malaysia dapat dikecualikan daripada cukai pendapatan bagi entiti berikut:

- (i) Amanah Pelaburan Hartanah (REITS).
- (ii) Koperasi.

[ 8 markah ]

(b) First-REIT, sebuah amanah pelaburan hartanah yang diluluskan oleh Suruhanjaya Sekuriti, memula operasi pada 1 April 2006 dan menyediakan akaunnya sehingga 31 Mac setiap tahun. Penyata pendapatan bagi tahun berakhir 31 Mac 2007 adalah seperti berikut:

|                                     | RM'000 |
|-------------------------------------|--------|
| Pendapatan sewa dari Malaysia       | 5,000  |
| Dividen Malaysia (kasar)            | 3,000  |
| Pendapatan Feadah Malaysia          | 2,000  |
|                                     | 10,000 |
| Belanja (andaikan semua dibenarkan) | 4,500  |
|                                     | 5,500  |

Pada 2 Mac 2007, First-REIT mengagih amaun sebanyak RM5,000,000 kepada pemegang unit yang meliputi berikut:

- (i) 20% individu yang tidak bermastautin.
- (ii) 30% syarikat yang bermastautin; dan.
- (iii) 50% pelabur institusi yang tidak bermastautin.

**Dikehendaki:**

- (a) Kirakan cukai yang kena dibayar oleh First-REIT bagi tahun taksiran 2007;
- (b) Kirakan cukai yang kena dibayar oleh pemegang unit berikut bagi tahun taksiran 2007:
  - (i) Individu yang tidak bermastautin.
  - (ii) Syarikat yang bermastautin.
  - (iii) Pelabur institusi yang tidak bermastautin.

[ 12 markah ]

**Question 4 (15 marks)**

Refuse Treatment Sdn Bhd, a company resident in Malaysia for tax purposes, had entered into an agreement with a consortium of two parties for the design, engineering, procurement and installation of a waste recycling plant. The parties to the consortium and their respective responsibilities under the agreement are as follows:

- (a) UK Co Ltd, a company resident in the United Kingdom, is responsible for the design and supervision of the construction of the waste recycling plant. The design work was wholly carried out in the United Kingdom for which UK Co Ltd was paid RM2 million. UK Co. Ltd also engaged two foreign engineers from February 1, 2007 to September 30, 2007 to supervise the construction of the plant for which it was paid RM10 million.
- (b) Japan Co Ltd, a company resident in Japan, is responsible for the procurement and installation of the plant. The value of this portion of the contract is as follows.

|           | RM '000 |
|-----------|---------|
| Equipment | 30      |
| Labour    | 20      |
|           | 50      |

Japan Co Ltd had purchased the equipment in Japan from Nihon Co Ltd ( a c c o m p a n y resident in Japan) and also engaged Nihon Co Ltd as a sub-contractor for the installation work, which commenced on February 1, 2007 and ended on September 30, 2007. Nihon Co Ltd received RM20 million for the supply of the equipment and RM15 million for the installation work carried out in Malaysia.

**Required:**

- (i) Explain the withholding tax obligations of Refuse Treatment Sdn Bhd and Japan Co Ltd in respect of the payments made by them, the consequences of their failure to comply with their obligations and any remedies available.

[ 7 marks ]

- (ii) Advise UK Co Ltd, Japan Co Ltd and Nihon Co Ltd as to their liability to Malaysian tax.

[ 6 marks ]

- (iii) State, with reasons, whether or not the two foreign engineers will be liable to Malaysian tax.

[ 2 marks ]

Soalan 4 (15 markah)

*Refuse Treatment Sdn Bhd, sebuah syarikat bermastautin di Malaysia bagi tujuan percukaian telah menandatangani satu perjanjian dengan sepihak konsortium yang meliputi dua pihak untuk rekabentuk, kejuruteraan, penghasilan dan pemasangan jentera kitar semula sisa. Pihak dalam konsortium dan tanggungjawab dalam perjanjian tersebut adalah seperti berikut:*

- (a) *UK Ltd., sebuah syarikat bermastautin di United Kingdom adalah bertanggungjawab pihak konsortium bagi reka bentuk dan penyeliaan pembinaan jentera kitar semula sisa. Keseluruhan kerja reka bentuk telah dijalankan di United Kingdom di mana UK Co. Ltd. dibayar RM2 juta. UK Co. Ltd. juga telah melantik dua orang jurutera asing dari 1 Februari 2007 hingga 30 September 2007 untuk menyelia pembinaan jentera tersebut dan mereka dibayar RM10 juta.*
- (b) *Japan Co Ltd, sebuah syarikat bermastautin di Jepun adalah bertanggungjawab bagi perolehan dan pemasangan jentera. Nilai bahagian kontrak ini adalah seperti berikut:*

|           | RM '000 |
|-----------|---------|
| Peralatan | 30      |
| Buruh     | 20      |
|           | 50      |

*Japan Co Ltd telah memperolehi peralatan di Jepun daripada Nihon Co. Ltd (sebuah syarikat bermastautin di Jepun) dan telah melantik Nihon Co. Ltd. sebagai sub-kontraktor untuk kerja pemasangan yang bermula pada 1 Februari 2007. Nihon Co. Ltd. menerima RM20 juta bagi bekalan peralatan dan RM15 juta bagi kerja pemasangan yang dijalankan di Malaysia.*

**Dikehendaki:**

- (i) *Jelaskan obligasi cukai pegangan Refuse Treatment Sdn Bhd dan Japan Co Ltd berhubung dengan pembayaran dibuat oleh mereka; dan kesan kegagalan mematuhi peruntukkan tersebut serta remedi yang sedia ada.*

[ 7 markah ]

- (ii) *Nasihatkan UK Co Ltd, Japan Co Ltd dan Nihon Co Ltd mengenai liabiliti mereka di bawah peruntukan cukai pegangan di Malaysia.*

[ 6 markah ]

- (iii) *Nyatakan dengan alasan sama ada kedua-dua jurutera asing akan dikenakan cukai Malaysia atau tidak.*

[ 2 markah ]

Question 5 (25 marks)

Perusahaan Sedap Sdn. Bhd. has been in the food business for many years. 80% of the paid-up capital in ordinary shares of the company was owned by Mr. Lim until 30 September 2006. On 1 October 2006, all of Mr. Lim's ordinary shares were taken over by Glugor Bhd.

The financial results for year ended 30 June 2007 is as follows:

|                                   | <u>Note</u> | <u>RM'000</u> | <u>RM'000</u> |
|-----------------------------------|-------------|---------------|---------------|
| Sales                             |             | 10,300        |               |
| Less: Cost of sales               | 1           | 6,500         |               |
| Gross profit                      |             |               | 3,800         |
| Salaries, wages, allowances & EPF | 2           | 1,060         |               |
| Travelling & accommodation        | 3           | 140           |               |
| Freight & insurance               | 4           | 160           |               |
| Interest expense                  | 5           | 380           |               |
| Professional fees                 | 6           | 50            |               |
| Bad debts (trade)                 | 7           | 290           |               |
| Foreign exchange loss             | 8           | 45            |               |
| Advertisement & promotion         | 9           | 100           |               |
| Office rental                     |             | 170           |               |
| Repairs & maintenance             | 10          | 65            |               |
| Amortisation of intangible assets | 11          | 220           |               |
| General expenses                  | 12          | 20            | 2,700         |
|                                   |             |               | 1,100         |
| Add: Other income                 | 13          |               | 500           |
| Net profit before tax             |             |               | 1,600         |

Notes:

|  |               |
|--|---------------|
| 1. Cost of sales:  | <u>RM'000</u> |
| Included under cost of sales are:  | 1,100         |
| Depreciation of fixed assets.  | 210           |
| Provision for stock obsolescence (last year: NIL) Stock written off.               | 40            |
| Wages of handicapped workers.  | 20            |
| Insurance premium to a locally incorporated insurance company for export of goods. | 30            |
|  | ...13/-       |

|    |  |               |
|----|--|---------------|
| 2. | Salaries, wages, allowances & EPF:   | <u>RM'000</u> |
|    | Contributions to EPF for managing director whose remuneration was RM300,000.                   | 60            |
|    | Contributions to approved retirement fund for senior executives at 4% of remuneration.         | 6             |
|    | Entertainment allowances for marketing staff.  | 50            |
| 3. | Travelling & accommodation:  | <u>RM'000</u> |
|    | Leave passage for expatriate employee.   | 5             |
|    | Relocation cost for expatriate employee, including family members.                             | 10            |
|    | Air passage for Director to perform umrah.   | 4             |
| 4. | Freight & insurance:   | <u>RM'000</u> |
|    | Premium paid to Malaysian branch of a foreign insurance company on import of raw materials.    | 4             |
|    | Freight charges.   | 30            |
| 5. | Interest expense:  | <u>RM'000</u> |
|    | Overdue interest on late payment to suppliers.   | 20            |
|    | Hire purchase & lease interest.  | 50            |
|    | Revolving credit & bankers' acceptance interest.   | 230           |
|    | Interest on term loan to acquire 60% of the shares in a marketing company, Kek Sedap Sdn. Bhd. | 80            |

|    |   |               |
|----|---|---------------|
| 6. | Professional fees:  | <u>RM'000</u> |
|    | Fees paid to a firm to undertake market research.   | 11            |
|    | Special audit fees for preparation for listing on the Malaysian Stock Exchange.                           | 10            |
|    | Statutory audit fees and tax filing fees.   | 12            |
|    | Legal fees to obtain a bank loan to purchase plant.   | 4             |
|    | Fees paid to a Singapore company for technical assistance on which withholding tax had not been deducted. | 13            |

## 7. Bad debts (Trade)

The movement of the provision for doubtful debts account is as follows:

|   | <u>General</u><br><u>RM'000</u> | <u>Specific</u><br><u>RM'000</u> | <u>Total</u><br><u>RM'000</u> |
|---|---------------------------------|----------------------------------|-------------------------------|
| Opening balance                             | 300                             | 560                              | 860                           |
| Add: Provision for the period               | 200                             | 410                              | 610                           |
| Less: Provision no longer required          | (100)                           | (220)                            | (320)                         |
| Bad debts written off against provision -   | (140)                           | (140)                            |                               |
| Transfer from general to specific provision | (200)                           | 200                              | -                             |
| Closing balance                             | <u>200</u>                      | <u>810</u>                       | <u>1,010</u>                  |

Of the specific provision of RM410,000, an amount of RM50,000 relates to a subsidiary company which was in financial difficulties and hence no legal action was taken to recover the debt. The transfer from general to specific provision was made as some of the debtors could be identified and legal action has been taken to recover the debts.

|    |  |               |
|----|--|---------------|
| 8. | Foreign exchange loss:   | <u>RM'000</u> |
|    | Loss on conversion into Ringgit of balances by overseas trade debtors at year – end. | (55)          |
|    | Gain on payment to a foreign supplier for purchase of machinery.                     | 10            |
| 9. | Advertisement & promotions:  |               |

Included in the above is RM23,000 in respect of a dinner for dealers and agents for meeting their targets.

## 10. Repairs &amp; maintenance:

Included in the above is RM22,000 relating to parts and accessories used for carrying out minor machine repairs.

11. Amortisation of intangible assets: RM'000

|  |     |
|--|-----|
| Goodwill written off.  | 40  |
| Approved research & development (R & D) expenditure written off<br>(amount capitalised in the year ended 30 June 2000 was RM600,000<br>and is amortised over 5 years). | 140 |
| Approved R & D expenditure incurred in the year.   | 40  |

12. General expenses include: RM'000

|  |   |
|--|---|
| Compound finr for air pollution.                           | 2 |
| Cash vouchers donated to approved charitable institutions. | 2 |
| Printing of share certificates of the company.             | 4 |

13. Other incomes comprise: RM'000

|  |     |
|--|-----|
| Dividend income from Sedap Sdn. Bhd. (gross).          | 250 |
| Tax exempt dividends from quoted shares.               | 60  |
| Interest income on short-term deposits.                | 90  |
| Interest on over due trade discounts.                  | 70  |
| Interest remitted from Singapore on currency accounts. | 30  |

14. The company has absorbed tax losses and unabsorbed capital allowances brought forward from year of assessment 2006 of RM290,000 and RM55,000 respectively. The capital allowances claim for the year of assessment 2007 is RM920,000. The credit balance brought forward in the Section 108 account from the year of assessment 2006 was RM44,000.

15. The company can claim group reliefs from the current year losses of two surrendering wholly-owned subsidiaries amounting RM100,000 and RM60,000 respectively for year of assessment 2007 .

...16/-

**Required:**

- (a) Compute the income tax payable, if any, by Perusahaan Sedap Bhd. for year of assessment 2007;

[ 3 marks ]

- (b) Compute the shortfall under Section 108, Income Tax Act 1967, if Perusahaan Sdn. Bhd paid a net dividend of RM1,400,000 on 31 December 2006.

[ 22 marks ]

Soalan 5 (25 markah)

Perusahaan Sedap Sdn. Bhd. telah menjalankan perniagaan pembuatan makanan untuk beberapa tahun. 80% modal berbayar syarikat. dalam saham biasa adalah dimiliki oleh Encik Lim sehingga 30 September 2006. Pada 1 Oktober 2006, kesemua saham biasa milik Encik Lim telah diperolehi oleh Glugor Bhd.

Prestasi bagi tahun berakhir 30 Jun 2007 adalah seperti berikut:

|                                | <u>Note</u> | <u>RM'000</u> | <u>RM'000</u> |
|--------------------------------|-------------|---------------|---------------|
| Jualan                         |             | 10,300        |               |
| Tolak: Kos jualan              | 1           | 6,500         |               |
| Untung kasar                   |             |               | 3,800         |
| Gaji, upah, elaun & KWSP       | 2           | 1,060         |               |
| Pengangkutan & insurans        | 3           | 140           |               |
| Perjalanan & penginapan        | 4           | 160           |               |
| Belanja faedah                 | 5           | 380           |               |
| Yuran ikhtisas                 | 6           | 50            |               |
| Hutang lapuk (niaga)           | 7           | 290           |               |
| Kerugian pertukaran wang asing | 8           | 45            |               |
| Iklan & promosi                | 9           | 100           |               |
| Sewa pejabat                   |             | 170           |               |
| Pembaikan & penyelenggaraan    | 10          | 65            |               |
| Pelunasan aset tak ketara      | 11          | 220           |               |
| Belanja am                     | 12          | 20            | 2,700         |
|                                |             |               | 1,100         |
| Campur: Pendapatan lain        | 13          |               | 500           |
| Untung bersih sebelum cukai    |             |               | 1,600         |

Nota:

|    |   |               |
|----|---|---------------|
| 1. | Cost of sales:  | <u>RM'000</u> |
|    | Susutnilai aset tetap.  | 1,100         |
|    | Peruntukan keusangan stok (tahun lepas: tiada).   | 210           |
|    | Stok dihapuskirakan.  | 40            |
|    | Upah pekerja kurang upaya.  | 20            |
|    | Premiam insurans bayar kepada syarikat insurans Malaysia untuk barang dieksport.                        | 30            |
| 2. | Gaji, upah, elaun & KWSP:   | <u>RM'000</u> |
|    | Sumbangan kepada KWSP untuk pengarah pengurusan dengan gaji RM300,000.                                  | 60            |
|    | Sumbangan kepada dana pesaraan untuk pegawai atasan yang diluluskan pada kadar 4% saraan.               | 6             |
|    | Elaun keraian untuk staf pemasaran.   | 50            |
| 3. | Pengangkutan & insurans meliputi:   | <u>RM'000</u> |
|    | Tambang bagi pegawai asing.   | 5             |
|    | Kos penempatan semula bagi pegawai asing dan ahli keluarganya.  | 10            |
|    | Tambang bagi pengarah menunaikan umrah.   | 4             |
| 4. | Perjalanan & penginapan:  | <u>RM'000</u> |
|    | Premiam insurans bayar kepada cawangan syarikat insurans asing di Malaysia untuk bahan mentah diimport. | 4             |
|    | Caj pengangkutan.   | 30            |

|    |   |               |
|----|---|---------------|
| 5. | Belanja faedah:   | <u>RM'000</u> |
|    | Faedah ke atas bayaran lambat kepada pembekal.  | 20            |
|    | Sewa beli & faedah pajakan.   | 50            |
|    | Kredit pusingan & faedah penerimaan bank.   | 230           |
|    | Faedah ke atas pinjaman untuk memperolehi 60% saham sebuah syarikat pemasaran – Kek Sedap Sdn. Bhd. | 80            |

|    |   |               |
|----|---|---------------|
| 6. | Yuran ikhtisas:   | <u>RM'000</u> |
|    | Bayaran kepada firma untuk penyelidikan pemasaran.  | 11            |
|    | Yuran audit khas untuk persiapan penyenaiaan di BSKL.   | 10            |
|    | Yuran audit statutori & yuran persiapan percukaian.   | 12            |
|    | Yuran guaman supaya mendapatkan pinjaman bank untuk membeli jentera.                                | 4             |
|    | Bayaran kepada syarikat Singapura untuk bantuan teknik yang mana cukai pegangan belum lagi ditolak. | 13            |

7. Hutang lapuk

Catatan dalam Akaun Peruntukan Hutang Lapuk adalah seperti berikut:

|   | <u>General</u><br>RM'000 | <u>Specific</u><br>RM'000 | <u>Total</u><br>RM'000 |
|---|--------------------------|---------------------------|------------------------|
| Baki permulaan                              | 300                      | 560                       | 860                    |
| Campur: Peruntukan bagi tempoh              | 200                      | 410                       | 610                    |
| Tolak: Peruntukan yang tidak perlu lagi     | (100)                    | (220)                     | (320)                  |
| Hutang lapuk dihapuskan -                   | (140)                    | (140)                     |                        |
| Pindahan daripada Peruntukan Am ke Spesifik | (200)                    | 200                       | -                      |
| Baki akhir                                  | <u>200</u>               | <u>810</u>                | <u>1,010</u>           |

Antara Peruntukan Spesifik sebanyak RM410,000, amaun sebanyak RM50,000 adalah berkaitan dengan anak syarikat yang menghadapi kesulitan kewangan dan tiada tindakan guaman diambil untuk memulihkan hutang tersebut. Pindahan dari Peruntukan Am ke Peruntukan Spesifik dibuat kerana sebahagian penghutang dapat dikenalpastikan dan tindakan guaman telah diambil supaya memulihkan hutang tersebut.

|     |  |               |
|-----|--|---------------|
| 8.  | Kerugian pertukaran wang asing:  | <u>RM'000</u> |
|     | Kerugian ke atas pindahan baki Akaun penghutang niaga asing pada hujung tahun ke Ringgit Malaysia.   | (55)          |
|     | Keuntungan ke atas bayaran kepada pembekal asing untuk pembelian mesin.  | 10            |
| 9.  | Iklan & promosi:   |               |
|     | Ini termasuk belanja jamuan & keraian sebanyak RM23,000 untuk pemborong & ajen kerana mencapai matlamat jualannya.   |               |
| 10. | Pembaikan & penyelenggaraan:   |               |
|     | Pembaikan & penyelenggaraan meliputi amaun sebanyak RM22,000 yang berkaitan dengan komponen dan aksesori yang digunakan untuk mengendalikan pembaikan kecil.                                 |               |
| 11. | Pelunasan aset tak ketara termasuk berikut:  | <u>RM'000</u> |
|     | Muhibah dihapuskirakan.  | 40            |
|     | Perbelanjaan Penyelidikan & Pembangunan yang diluluskan yang telah dihapuskirakan (Amaun dipermodalkan pada tahun berakhir 30 Jun 2000 ialah RM600,000 dan ianya dilunaskan selama 5 tahun). | 140           |
|     | Perbelanjaan penyelidikan & pembangunan dalam tahun yang diluluskan.   | 40            |
| 12. | Belanja am termasuk:   | <u>RM'000</u> |
|     | Denda kesalahan pencemaran alam sekitar.   | 2             |
|     | Boucher tunai yang diderma kepada institusi kebajikan.   | 2             |
|     | Percetakan sijil saham syarikat.   | 4             |

- |     |   |               |
|-----|---|---------------|
| 13. | Pendapatan lain meliputi berikut:                                   | <u>RM'000</u> |
|     | Dividen daripada Kek Sedap Sdn. Bhd. (kasar).                       | 250           |
|     | Dividen dikecualikan daripada saham yang disenaraikan.              | 60            |
|     | Faedah ke atas akaun belum bayar.                                   | 90            |
|     | Faedah ke atas deposit jangka pendek.                               | 70            |
|     | Faedah ke atas akaun urusanniaga wang asing diremit dari Singapura. | 30            |
14. Syarikat mempunyai kerugian hantar ke depan dan elaun modal hantar ke depan dari tahun taksiran 2000 sebanyak RM290,000 dan RM55,000 masing-masing. Elaun modal untuk tahun taksiran 2001 ialah RM920,000. Baki kredit hantar ke depan dalam Akaun S.108 dari tahun 2000 ialah RM44,000.
15. Syarikat layak menuntut pelepasan cukai kumpulan dari kerugian semasa dua anak syarikat pemilikan tunggal sebanyak RM100,000 dan RM60,000 masing-masing bagi tahun taksiran 2007.

**Dikehendaki:**

- (a) Kirakan pendapatan boleh dikenakan cukai Perusahaan Sdn. Bhd. bagi tahun taksiran 2007, jika ada, dan;
- [ 3 markah ]
- (b) Kirakan kekurangan di bawah S.108, Akta Cukai Pendapatan 1967, jika Perusahaan Sdn. Bhd. membayar dividen bersih sebanyak RM1,400,000 pada 31 Disember 2006.
- [ 22 markah ]