E-invoicing in Malaysia:

A complete guide



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Introduction

An initiative to automate and digitize businesses has been sweeping across the globe, influencing nearly every corner of the world. Over time, countries worldwide increasingly recognize the benefits of automation in business operations and government functions, aiming to ensure robust compliance within their respective ecosystems.

E-invoicing stands out as a prominent component of this business operations revolution, representing a significant stride towards automation and serving as a crucial initiative for governments to combat tax evasion. While numerous countries have already successfully implemented e-invoicing in their business operations, many others are in the process of adopting it.

Malaysia's e-invoicing move

In Malaysia, the government keenly observed the global trends and benefits associated with e-invoicing, with a precise aim to bolster the growth of the digital economy and improve the efficiency of tax administration management with e-invoicing. This commitment was evident in their announcement of e-invoicing implementation during the 2023 budget. This initiative aligns seamlessly with the objectives outlined in the Twelfth Malaysia Plan, which significantly emphasizes enhancing digital services infrastructure and digitalizing tax administration processes.

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However, in October of the same year, it was revealed that the implementation of e-invoicing was being postponed until 2024. Despite this delay, it was evident that e-invoicing was poised to make its mark in Malaysia sooner or later, aligning with the broader global movement towards automation and digitalization.

Let's have a deep understanding of Malasiyan e-invoicing.

What is an e-invoice?

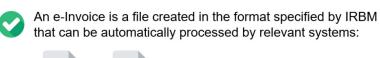
An e-invoice is a digital document/representation of the transaction between buyer and seller, mainly in JSON or XML format as specified by the government. It will contain all mandatory details of the transaction, such as details of seller and buyer, details of goods or services supplied, tax amount, total value, and other optional details. It aims to replace paper-based or other electronic (PDF, Excel, etc.) invoices, credit notes, or debit notes.

Further, there is also a concept of **Self-bill e-invoice** in Malaysia. Generally, an e-invoice is issued by the supplier of the goods or service to record as proof of expense for them and as proof of expense for the buyer. However, in some cases, the e-invoice is issued by a person other than the supplier, which is called a **Self-bill e-invoice**.

For e-Invoice purposes, self-billed e-Invoice will be allowed for the following transactions:

- **a.** Payment to agents, dealers, distributors, etc.
- **b.** Goods sold or services rendered by foreign suppliers
- **c.** Profit distribution (e.g., dividend distribution)
- **d.** Electronic commerce ("e-commerce") transactions.
- **e.** Pay-out to all betting and gaming winners
- **f.** Acquisition of goods or services from individual taxpayers (who are not conducting a business)
- h. Interest payment











The authority governing e-invoicing compliance in Malaysia

The Inland Revenue Board (IRBM) of Malaysia is the governing authority for e-invoicing compliance in Malaysia. It has released various guidelines required for the implementation of e-invoicing. It mainly contains methods of implementation, consequences of compliance and non-compliance, archival requirements, etc.

IRBM has entered into a Memorandum of Understanding (MoU) with the Malaysian Digital Economy Corporation (MDEC), a strategic government initiative to attract talent and investors to the country. Through this partnership, businesses will gain access to the PEPPOL network via trusted access point providers like Cygnet.

MDEC plays a crucial role in accrediting PEPPOL service providers in Malaysia and overseeing the framework, requirements, and technical standards governing the network.



Timeline for implementation of E-invoicing in Malaysia

E-invoicing in Malaysia will be implemented in a phased manner for a smooth transition and to provide sufficient time to adapt to these changes based on the turnover or revenue threshold, which is as follows:

Sr No	Turnover/ Revenue Threshold	Date of Implementation	
1	Taxpayers with an annual turnover or revenue of more than RM100 million	1st August 2024	
2	Taxpayers with an annual turnover or revenue of more than RM25 million and up to RM100 million	1st January 2025	
3	All other taxpayers	1st July 2025	

Let us briefly understand the turnover/revenue threshold and a few guidelines to consider.

The annual turnover/revenue for e-invoice implementation will be determined as follows:

- For taxpayers with audited financial statements, it will be based on the annual turnover/revenue stated in the statement of comprehensive income of the audited financial statements for FY 2022.
- For taxpayers without audited financial statements, it will be based on the annual revenue reported in the tax return for the year of assessment 2022.

If there's a change in the accounting year end for the financial year 2022, the taxpayer's turnover will be pro-rated to a 12-month period for determining the e-invoice implementation date.





Other points

- For new businesses or operations starting from 2023 onward, the e-Invoice implementation date is July 1, 2025.
- Once a taxpayer's e-invoice implementation timeline is determined, subsequent annual turnover or revenue changes will not alter their obligation to implement e-invoice based on the established timelines.
- Taxpayers can opt to voluntarily participate in implementing e-Invoice at an earlier date, regardless of their annual turnover or revenue.
- Any e-invoice created and issued on or after the implementation date would be required to be an e-invoice issued following the requirements set by IRBM.
- Invoices issued prior to the e-invoice implementation date applicable to the taxpayers are not required to be converted into an e-invoice.
- As the compliance obligation of issuing an e-invoice lies with the Supplier (or the Buyer in the case of a self-billed e-invoice), taxpayers may receive either a normal receipt or validated e-invoice during the transitional period until full implementation has been in place.



Transaction type covered in Malaysian e-invoicing

E-invoicing covers B2B, B2C, and B2G transactions. For B2G transactions, the e-invoice flow will be similar to B2B.

For buyers who do not require e-invoices, suppliers can prepare a consolidated e-invoice every month and submit it within seven calendar days after the month's end.

E-invoicing covers all taxpayers doing commercial activities in Malaysia. It requires all individuals and legal entities to comply with e-invoicing, including:

- Associations
- Body of persons
- Branch
- Business trust
- Co-operative societies
- Corporations
- Limited liability partnership
- Partnership
- Property trust fund
- Property trust
- Real estate investment trust
- Representative office and regional office
- Trust body; and
- Unit trust.



Categories exempted from e-invoicing compliance

For e-Invoice, the following persons are currently exempted from issuing e-Invoice (including issuance of self-billed e-Invoice):

Individuals

- a. Ruler and Ruling Chief
- **b.** Former Ruler and Ruling Chief
- **c.** Consort of a Ruler of a State with specified titles
- **d.** Consort of a Former Ruler of a State with specified titles
- **k.** Consular offices and diplomatic officers, consular officers, and consular employees
- Individuals not conducting business

Government Entities

- **e.** Government
- **f.** State government and state authority
- **g.** Government authority
- **h.** Local authority
- i. Statutory authority and statutory body
- **j.** Facilities provided by the above government, authority, or body



Other important Guidelines

- Receipts from the abovementioned exempted persons are proof of expense for tax purposes.
- Suppliers supplying goods or services to those mentioned above can issue e-invoices per the requirements.

About transactions with persons (a), (b), (c), (d), and (k) above, Suppliers are allowed to replace the Buyer's details with the information stated in the e-Invoice Specific Guideline issued by IRBM as mentioned in table 3 below in the "Details to be provided for e-invoice generation" part of this e-book.

- About transactions with persons (e), (f), (g), (h), (i), and (j) above, Suppliers are allowed to input the Buyer's TIN field with the general TIN assigned in Appendix 1 of the e-Invoice Specific Guideline issued by IRBM as mentioned in the appendix below.
- The above exemption will only apply to said persons. Any entities (e.g., companies, limited liability partnerships, etc.) owned by the persons mentioned above would still be required to implement e-Invoice in accordance with the e-Invoice implementation timeline.
- Certain types of income or expenses are exempted from e-invoicing requirements, such as
 - a. Employment income
 - **b.** Pension
 - **c.** Alimony
 - d. Distribution of dividends in specific circumstances
 - e. Zakat
- Exemptions are subject to periodic review for updates.



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APPENDIX 1 – As per specific guidelines. List of General TIN

No	General TIN	Assigned as	Applicable to the following transaction
1.	"EI00000000010"	General Public's TIN	Applicable to individuals (Supplier, Buyer, Shipping Recipient) in e-Invoices, especially for Malaysian individuals providing MyKad/ MyTentera ID. Buyer's TIN in the consolidated e-Invoice
2.	"EI00000000020"	Foreign Buyer's TIN	Used for non-Malaysian individuals in e-Invoices, particularly when providing passport number/MyPR/ MyKAS ID. Also applicable for export transactions where a foreign buyer's TIN is unavailable.
3.	"EI0000000030"	Foreign Supplier's TIN	Utilized for non-Malaysian individuals in e-Invoices, especially when providing passport number/ MyPR/MyKAS ID (for self-billed e-Invoices). Also used for import transactions when a foreign supplier's TIN is unavailable (for self-billed e-Invoices).
4.	"EI0000000040"	Buyer's TIN	Assigned for Buyer's TIN in transactions involving specific entities: Government State government and state authority Government authority Local authority Statutory authority and statutory body Exempt institutions that are not assigned with TIN



Scenarios required and Type of e-invoice to be issued

Type of e-invoice to be issued:

- **1. Invoice:** A commercial document for transactions between seller and buyer and for self-bill e-invoice to cover expenses.
- 2. Credit Note: A credit note is issued by Suppliers to correct errors, apply discounts, or account for returns in a previously issued e-invoice to reduce the value of the original e-invoice. This is used in situations where the reduction of the original e-invoice does not involve the return of monies to the Buyer.
- **3. Debit Note:** A debit note indicates additional charges on a previously issued e-invoice.
- **4. Refund Note:** A refund note e-invoice is a document issued by a Supplier to confirm the refund of the Buyer's payment. This is used when there is a return of money to the Buyer.

Scenarios required for the issue of e-invoice:

- Proof of Income: This document is issued when a sale or income-generating transaction is made to quantify the taxpayer's income.
- **2. Proof of Expense:** This document is issued in case of purchase or other expenses incurred for returns and discounts, reduction/correction of income amount, or generating self-bill e-invoice for expenses for foreign transactions.



Different Methods to Generate e-invoice

For easy workflow of the e-invoice, IRBM has developed two models:

- **1.** A portal (Mylnvois Portal) by IRBM
- **2.** API (Application Programming Interface)- Methods to transmit e-invoice via API include:
 - Direct Integration of taxpayer's ERP with Mylnvois Portal
 - Through Non-peppol technology provider
 - Through Peppol service provider

Let's understand briefly the key considerations of both methods for effective decision-making:

MyInvois Portal

- Accessible to all taxpayers.
- Businesses requiring the issuance of e-invoices with API unavailability.
- Requires taxpayers to fill in the information in the pre-defined form or IRBM-specified spreadsheet form.

Through API

- It is ideal for large organizations or taxpayers with a high volume of transactions.
- Requires upfront investment in technology and current ERP adjustments.
- Easy to access with less effort.



E-invoicing Process flow

As stated above, there are two ways to transmit e-invoice. One is through the Mylnvois Portal, and the second is through API, which is direct or by third-party service providers. In both cases, the aim is to transfer the invoice to the IRBM for validation. Let us understand each step of the process workflow for both methods:

Step-1 Generating and issuing e-invoice

After selling/supplying goods or services, the first step is to make a sales invoice. This invoice is transmitted to the IRBM.

- The invoice can be shared directly on the Mylnvois portal by manually entering the transaction details individually or in bulk for multiple transactions. It is tedious work and not ideal for big organizations with voluminous transactions.
- The invoice can be shared via API, where the third-party solution is suitable for businesses, automating the generation and transmission of the invoice with human intervention and verifying invoice information to avoid errors and discrepancies.

Step-2 E-invoice validation

The invoice shared on the portal is validated in real-time by IRBM for faster processing flow. It embeds a unique identification number for the validated invoice. Further, IRBM will send the supplier an e-invoice in PDF format via portal or API. It provides real-time tracking of invoices with minimal chances of invoice information being tampered with.

Step-3 Notification of validation

IRBM, via the Mylnvois portal or API, sends a notification about the successful clearance of the invoice or buyer rejection request to both the buyer and supplier.

Step-4 Invoice Sharing

The validated invoice has to be embedded with a QR code, which both buyer and supplier can use to know the invoice status, and the supplier must share the invoice with the buyer.

Step-5 Rejection or cancellation of Invoices

The buyer can request the rejection of the invoice, or the supplier can cancel the invoice shared with IRBM within 72 hours of its sharing directly on the Mylnovis portal or with the help of third-party tools.

Step-6 Storing e-invoice

All validated invoices shall be stored in the IRBM database, and taxpayers are also required to retain sufficient records and documentation.

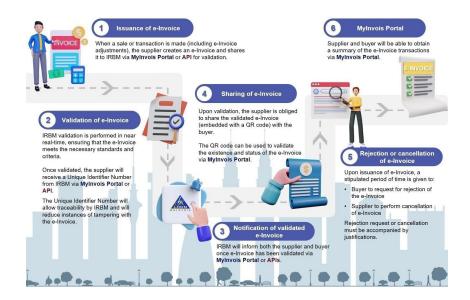
Step-7 Reporting and Dashboard service for taxpayers

Through MyInvois Portal or third-party solutions, taxpayers can have the option to request and retrieve e-invoices. It provides essential invoice details such as the invoice date, amount, invoice status, and other relevant information submitted to IRBM in the format of the following:

- XML/ JSON,
- 2. Metadata
- CSV report
- 4. PDF file



Apart from this, many third-party service solutions may also provide other insights on revenue trends, tax compliance, etc., which can help the CEO and CFO make informed decisions.







Details to be provided for e-invoice generation

Table-1 By Buyer

Field	For Malaysian Individuals	For Non-Malaysian Individuals
Buyer's Name	Full name as per MyKad/ MyTentera	Full name as per passport/MyPR/ MyKAS.
Buyer' TIN	Option 1- TIN only Option 2- MyKad/MyTentera identification number only Option 3 Both	Option 1- TIN only Option 2- Both * If TIN is unavailable, the supplier can use the general TIN as per appendix-1 of specific guidelines, along with passport/MyPR/MyKAS identification number.

Above this Buyer's Registration/Identification Number/Passport Number, address, contact number, and SST registration number are also required. However, If an individual Buyer is not registered for SST, the Supplier inputs "NA".



Table 2
By Individual Shipping Recipients for issuance of Annexure

Field	For Malaysian Individuals	For Non-Malaysian Individuals
Shipping Recipient's Name	Full name as per MyKad/ MyTentera	Full name as per passport/ MyPR/MyKAS.
Shipping Recipient' TIN	Option 1- TIN only Option 2- MyKad/ MyTentera identification number only Option 3 Both	Option 1- TIN only Option 2- Both * If TIN is unavailable, the supplier can use the general TIN as per appendix-1 of specific guidelines, along with passport/MyPR/MyKAS identification number.

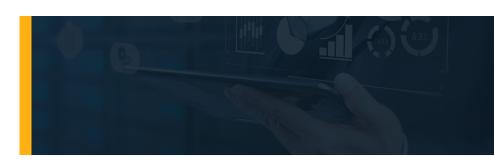
Additionally, the shipping recipient's address is required.



Table 3
As per specific guidelines, When the Buyer or
Shipping recipient either has a TIN or MyKad/MyTentera
identification number instead of both, the supplier can
replace the details as under:

Option	Applicable for	Data provided	Data Field	Supplier's Input
1	Malaysian and Buy non-Malaysian Shi	If individual Buyer/ Shipping Recipient only	Buyer's/Shipping Recipient's TIN.	TIN provided
		provides TIN	Buyer's/Shipping Recipient's Registration/ Identification Number/Passport Number	"000000000000"
2	Individuals Buyer/ Shipping Recipient only provide a MyKad/ MyTentera	Shipping Recipient only provides	Buyer's/Shipping Recipient's TIN.	"El00000000010"
		identification	Buyer's/Shipping Recipient's Registration/ Identification Number/Passport Number	Supplier inputs MyKad/MyTentera identification number provided

*Note: The Appendix 1 is mentioned above in this e-book.



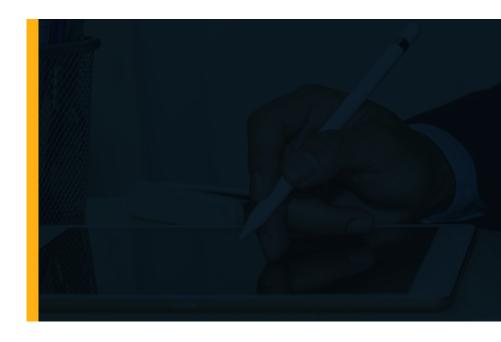
Challenges likely to be faced in the implementation of e-invoicing

Some of the significant challenges to be faced in the implementation of e-invoicing are as follows:

- Technological transition: E-invoicing requires online transmission, real-time reporting, data validation, and e-invoice in a specific format with embedded QR codes and UUID. This would require updated technology, robust internet connectivity, other software/solutions integration, and a government portal. This transition, with a lack of resources and knowledge, will take time and process errors at the initial stage of implementation.
- **Legal compliance:** The government requires various compliance in generating, transmitting, and validating e-invoices. Lack of proper knowledge of such legal compliance may lead to fees and penalties at earlier stages of implementation.
- **Bulk e-invoice transmission:** For a big organization that requires the bulk generation of e-invoices, it is difficult to identify how the technology will react during the initial stages. They might face problems with data buffering for invoice processing, updating huge amounts of data accurately, etc.
- **Synchronization with IRBM portal:** As e-invoicing requires real-time invoice reporting, accurate and efficient synchronization with the government portal is vital for the organization.
- **Security concerns:** Compliance with the law will require electronic transfer of the invoice, which is prone to leakage of sensitive data.



- ▶ Data accuracy and validation Generation, transmission, and validation of the invoice and invoice data in a particular format may create errors and discrepancies during the initial stage of operations due to a lack of knowledge, software, and expertise.
- **ERP Integration** Many organizations are still using outdated systems and technologies that might not be capable of generating e-invoices in the required format or for seamless integration with API or other third-party solutions.



Benefits of e-invoicing in Malaysia

Even though businesses have to face many challenges at the initial stage of e-invoicing implementation, its benefits are much more helpful for businesses to ensure the seamless running of the process workflow. Let us look at some significant benefits of e-invoicing in Malaysia.

- Standard invoice process: IRBM requires all businesses to issue e-invoices in required formats with required mandatory fields and a few optional fields. This would maintain standardization in issuing e-invoices and easy transmission among buyers, suppliers, and the government.
- Accuracy of Invoice data: As the data is generated electronically with minimal human intervention and validated by the government, chances of errors or discrepancies are minimal. Further, it reduces errors associated with paper-based invoicing, such as transcription mistakes or lost documents.
- by the government, which increases the authenticity of the invoices and thereby helps in the easy availability of funds from financial institutions for invoice discounting.
- Automated workflow: E-invoicing enables automated workflow processes, from invoice generation to final processing and data entries. Automation reduces the need for manual intervention, saving time and resources while increasing efficiency. Businesses can set up automated reminders for overdue payments, improving collections and reducing delays.



- Effective compliance: E-invoicing in Malaysia facilitates compliance with regulatory requirements and tax obligations. E-invoices can be automatically validated against tax regulations, reducing non-compliance risk and associated penalties. Additionally, e-invoicing provides an auditable trail of transactions, enhancing transparency and accountability.
- Improved cash flow: E-invoicing helps businesses maintain a healthier cash flow by accelerating the invoicing and payment. Faster invoice delivery and payment processing enable businesses to receive payments more promptly, reducing the time between invoicing and receipt of funds.
- Improved decision-making: E-invoicing gives businesses real-time access to financial data, enabling better-informed decision-making. With up-to-date insights into cash flow, revenue, and expenses, businesses can make strategic decisions more effectively, optimizing resource allocation and maximizing profitability.
- Streamlined financial reporting: E-invoicing simplifies financial reporting by providing accurate and readily accessible invoice data. Digital invoices can be easily integrated into accounting systems, facilitating seamless financial reporting and analysis. This streamlines the preparation of financial statements and enables businesses to comply with reporting requirements more efficiently.



Best Practice for your e-invoicing compliance

- First and foremost, check the timeline of e-invoicing implementation, identify in which phase your business falls, and accordingly plan for the implementation.
- Understand each e-invoice processing method, list the pros and cons of each method related to your business, and decide on the following methods.
- Check your current systems and technology and identify whether it meets compliance requirements.
- Update technologies in case legacy technologies align with the type of method to be used for e-invoice transmission.
- In case of direct reporting to the Mylnvois portal, line out the requirements and files to be maintained for easy reporting.
- In case of taking third-party services, select the right solution provider by examining
 - the features offered,
 - amendment implementation time,
 - turnaround time required,
 - Experience and expertise
 - Training and demos
 - In-house experts to solve queries
 - Data security measures,
 - Implementation cost and annual fees



- Cost is essential, but cheaper is not always better; therefore, check features and other factors before price.
- Implement e-invoicing methods and review regularly to identify errors or deficiencies.
- Improve the process and methods on a timely basis for seamless processing.



Empowering Your Business: How Cygnet Supports Your E-Invoicing Needs

- Cygnet provides a comprehensive e-invoicing solution tailored to the Malaysian market.
- Seamlessly integrated with leading ERP systems, including SAP, Oracle, and others, It ensures hassle-free ERP integration for your business.
- Our platform offers seamless e-invoice management, enabling you to effortlessly handle electronic invoices while adhering to LHDN's stringent data requirements.
- With our solution, enjoy the convenience of multiple data validations, ensuring accuracy and compliance at every step of the invoicing process.
- Our platform boasts high reliability and availability, backed by convenient integration options.
- Cygnet caters to your specific needs, whether you prefer cloud-based or on-premise solutions.
- Cygnet empowers your organization with robust hierarchy, user, and role management features coupled with a complete audit trail of data imports and flows.
- Say goodbye to manual data entry with automated vendors and product autofill options, enhancing efficiency and reducing errors.
- Our dedicated team of experienced tax technology professionals provides extended support and guidance, ensuring a seamless transition to e-invoicing.
- Trust in Cygnet's solution expertise and market-leading features to streamline invoicing processes and stay ahead in Malaysia's evolving digital landscape.



1. Is e-invoicing applicable only to transactions in Malaysia?

Ans. No, it is also applicable to cross-border transactions.

2. Is it applicable to all industries? Is there any exemption for any industry?

Ans. Currently, it applies to all industries. However, there are few people, incomes, and expenses on which e-invoicing is not applicable.

3. Can taxpayers modify the e-invoice?

Ans. Modification of e-invoice is not allowed. However, either the supplier can cancel, or the buyer can request for rejection of the e-invoice within 72 hours of its transmission to IRBM.

Any modification or change required after 72 hours has to be made using a new e-invoice, credit note, debit note, or refund note.

4. What are the consequences for failure to issue an e-invoice?

Ans. Failure to issue an e-invoice is an offense 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 six months or both for each non-compliance.



5. Are there any incentives provided to taxpayers for implementing e-invoices?

Ans. The Malaysian government has announced the following tax incentives or grants for implementing e-invoice during Budget 2024. Tax deduction of up to RM50,000 for each year of assessment given on environmental, social, and governance-related expenditure, including consultation fee for the implementation of e-Invoice incurred by MSMEs, effective from year of assessment 2024 to year of assessment 2027.

6. How do taxpayers issue an e-invoice to a non-Tax Identification Number (TIN) holder such as foreign (non-Malaysian) buyers?

Ans. Suppliers are required to obtain buyers' details from foreign buyers for e-invoice issuance. Regarding TIN being input in the e-Invoice, a supplier may use "El000000000000" for foreign buyers without TIN.

7. Do businesses need to submit an e-invoice within the same day the transaction is being made?

Ans. There is no specific requirement on the timing of e-invoice issuance, except in particular cases such as consolidated e-invoice, self-billed e-invoice for importation of goods/services, and e-invoice for foreign income. Where any specific legislation is applicable, you may proceed to follow the said legislation.

8. Is an e-invoice required for the return of monies to buyers?

Ans. Yes, a refund note e-invoice is required to return monies to buyers, with the following exceptions: 1. Payment made wrongly by buyers 2. Overpayment by buyers 3. Return of security deposits

9. When will Malaysian buyers be required to issue a self-billed e-invoice when acquiring goods from foreign suppliers?

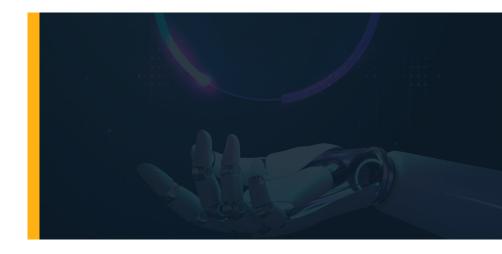
Ans. Malaysian buyers are required to issue a self-billed e-invoice by the end of the month following the month the Royal Malaysian Customs Department's (RMCD) clearance is obtained on the imported goods. The buyers would have to include the appropriate details as listed in the e-invoice annexure on the importation of goods.

10. Do we need to issue an e-invoice for intercompany charges?

Ans. Yes, an e-invoice is required to be issued for intercompany charges.

11. Is there any specific application required to scan the QR code?

Ans. The QR code will only contain a link to the validated e-invoice. Hence, any device (e.g., mobile camera, QR code scanner application) capable of scanning a QR code will be able to scan the OR code.



Conclusion

In conclusion, embracing Malaysia's e-invoicing system presents a pivotal opportunity for businesses to streamline financial processes, enhance efficiency, and contribute to a more sustainable and digitally driven economy. By adhering to the standards set forth by the Malaysian government and leveraging the available digital platforms and technologies, businesses can seamlessly transition to e-invoicing, realizing benefits such as reduced operational costs, faster payment cycles, improved accuracy, and enhanced compliance with regulatory requirements.

Moreover, adopting e-invoicing fosters greater transparency, security, and accountability in financial transactions, ultimately paving the way for increased competitiveness and growth in the Malaysian business landscape. As organizations navigate the complexities of e-invoicing implementation, continuous education, training, and collaboration with relevant stakeholders will be essential to maximize the potential of this transformative digital solution.



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Cygnet Infotech is dedicated to excellence and is re-evolving as CYGNET.

ONE to help consolidate its specialized offerings in Compliance transformations, Digital & Quality Engineering, Enterprise Modernization, Data, Al & Analytics Hyper Automation, Test automation, Digital signature, and a myriad of other offerings across Americas, the UK & Europe, Africa, the Middle East, and the Asia Pacific. Through Cygnet Cosmos, our digital transformation

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