

**IN THE COURT OF APPEAL OF MALAYSIA IN PUTRAJAYA  
(APPELLATE JURISDICTION)  
CIVIL APPEAL NO: W-01-471-10**

**BETWEEN**

**KETUA PENGARAH HASIL DALAM NEGERI.**

**... APPELLANT**

**AND**

**CARDINAL HEALTH MALAYSIA 211 SDN BHD**

**... RESPONDENT**

*Revenue Law – paragraph 28 Schedule 6 – Income Tax Act 1967 – Income Tax (Exemption) (No.48) Order 1997*

Issue : Whether interest income received by the tax payer from loans given to Allegiance Healthcare Holdings BV, Netherlands is income of a foreign source and eligible for exemption under the *Income Tax (Exemption) (No.48) Order 1997*.

Decision : The Court of Appeal dismissed the Revenue's appeal.

Based on the facts of the case the interest income received by the tax payer from loans given to Allegiance Healthcare Holdings BV, Netherlands is income of a foreign source and eligible for exemption under the *Income Tax (Exemption) (No.48) Order 1997*.

Status : No grounds of judgment are provided by the Court of Appeal. No right of further appeal.

Date of Judgment : 19 April 2012