

**IN THE COURT OF APPEAL OF MALAYSIA IN PUTRAJAYA**  
**(APPELLATE JURISDICTION)**  
**CIVIL APPEAL NO: W-01-91-08**

**BETWEEN**

**PERAM RANUM BERHAD**

**... APPELLANT**

**AND**

**KETUA PENGARAH HASIL DALAM NEGERI**

**... RESPONDENT**

*Revenue Law– interpretation – subparagraph 60(3)(b)(ii) - Income Tax Act 1967*

Issue : Whether the uplifting of fixed deposits upon maturity can be considered as a realization of investment for the purposes of subparagraph 60(3) (b) (ii) of the Income Tax Act 1967.

Decision : The Court of Appeal dismissed the tax payer's appeal.  
The uplifting of fixed deposits cannot be regarded as a realization of investment. The fixed deposit itself is not an investment.

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

Date of Judgment : 5 April 2012