

Should Malaysia Mandate a Minimum Remuneration for Pupils in Legal Chambers?

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Abstract

Pupil remuneration in Malaysia remains a pressing but under-addressed issue. The *Legal Profession Act 1976 (LPA)* does not clearly define the minimum wage or benefits to which pupils are entitled. As a result, many pupils are paid minimal amounts, sometimes below the national minimum wage, and are left struggling with the rising cost of living. Without proper legal protection, this lack of clarity allows some law firms to exploit pupils under the guise of fulfilling vague statutory obligations.

This article examines the current legal framework surrounding pupil remuneration in Malaysia and argues that the provisions under the LPA are ambiguous and inadequate. It draws attention to the lack of specific amounts detailing minimum remuneration and the absence of enforcement mechanisms, both of which contribute to ongoing exploitation.

The article explores the idea of legislative reform that would expressly outline a minimum wage for pupils and highlights the efforts that have been made to advocate for minimum remuneration for pupils in Malaysia. Establishing a statutory minimum wage would not only protect pupils from exploitation but also preserve the integrity of the legal profession in the country.

In conclusion, to support this proposal, it includes a comparative analysis with jurisdictions such as the United Kingdom and Hong Kong, where clearer regulations have improved fairness and transparency in pupillage arrangements.

Keywords: Minimum Remuneration, Pupil, The Legal Profession Act 1976 (LPA)

I. Introduction

Before we delve into the topic of remuneration for pupils in Malaysia, it is important to first understand what pupillage entails.

1.1 The Definition of Pupillage

To understand what 'pupillage' is and who a 'pupil' is, we must first understand how one becomes a certified lawyer in Malaysia.

First of all, before going through the pupillage period, you must first obtain a Bachelor of Laws degree (LLB). If you graduate from a public university in Malaysia, the LLB alone is sufficient.

However, if you graduate from a private university, you must also pass either the Certificate in Legal Practice (CLP) or the Bar course to qualify.¹

Under *Section 12(2) of the Legal Profession Act 1976 (LPA)*, a lawyer in Malaysia must undergo a nine-month period of pupillage before being admitted as an advocate and solicitor.² A person undergoing pupillage is referred to as a pupil and may also be called a pupil in chambers, chambering student, or chambie. The master is a lawyer with at least seven years of legal practice who supervises the pupil during their pupillage. The purpose of pupillage is to provide practical legal training before entering full practice.³

The conventional way to serve the 9-month pupillage is for pupils to join a law firm and attach themselves to a qualified lawyer who becomes their master. The pupil is responsible for working for the firm, while the master guides them throughout the period.⁴

In West Malaysia, the period of pupillage is nine months, whereas in Sabah and Sarawak, under *Section 4(1A) of these Advocate Ordinance Sabah*,⁵ and *Section 4(1A) of the Advocate Ordinance Sarawak*,⁶ the period of pupillage is twelve months.

Therefore, 'Pupillage' is a mandatory process that needs to be gone through to qualify as a lawyer in Malaysia.

1.2 Current Issues that are Encountered by Pupils in Malaysia

Currently, pupils in Malaysia may receive remuneration solely from their pupil master, as stipulated under *Section 12(3) of the LPA 1976*:

*"(3) No qualified person shall, without the special leave in writing of the Bar Council, hold any office or engage in any employment of any kind, whether full-time or otherwise, during his period of pupillage, but nothing in this subsection shall preclude a pupil from receiving remuneration from his master."*⁷

However, there are notable shortcomings in this provision. Firstly, the *LPA 1976* does not specify the amount of remuneration that a master is required to pay a pupil. This lack of clarity leaves the matter largely to the discretion of the pupil master, allowing wide variation in practice. Secondly, a plain reading of the provision suggests that there is no statutory obligation for

¹ Legal Profession Qualifying Board, Malaysia, 'About Us' <https://www.lpqb.org.my/index.php?Itemid=61&id=47&option=com_content&view=article> accessed 24 May 2025.

² Legal Profession Act 1976, s 12(2).

³ Malaysian Bar, 'Pupillage' (*Malaysian Bar*, nd)

<<https://www.malaysianbar.org.my/article/members/become-a-member/pupillage/pupillage>> accessed 24 May 2025.

⁴ Ibid.

⁵ Advocate Ordinance Sabah, s 4(1A).

⁶ Advocate Ordinance Sarawak, s 4(1A).

⁷ Malaysia Bar (n3).

masters to remunerate their pupils. Although it has become a convention to provide some form of allowance, there is no legal requirement enforcing it.

Moreover, although pupillage is a statutory requirement under the LPA, pupils are not classified as employees and therefore do not fall under the protection of employment legislation such as the *Minimum Wage Order 2024*, which sets the national minimum wage at RM1,700.

Consequently, some masters pay pupils as little as RM500 per month. In a city like Kuala Lumpur, where the cost of living continues to rise, such an amount is grossly inadequate to cover even basic expenses, let alone allow for savings.

The absence of a mandated minimum allowance leaves many pupils financially dependent on parents, partners or personal loans to complete the nine-month chambering period. Those from affluent backgrounds are able to complete pupillage with relative ease, while others may be discouraged, delayed or even forced to abandon the process entirely.

For pupils from B40 or lower M40 households, the challenge is even more severe. Without sufficient financial means, they may be compelled to postpone pupillage, take up side jobs in violation of *Section 12(3) of the LPA* or accept exploitative arrangements simply to qualify.⁸ This has the effect of systematically disadvantaging capable candidates from underprivileged backgrounds and reinforcing socio-economic barriers to entry into the legal profession.

The problem is compounded by a fragmented legal framework that leaves a compliance loophole. No specific agency is empowered to enforce a minimum remuneration for pupils. The Department of Labour, for example, has no jurisdiction unless an employment relationship is proven. This means pupils have no legal recourse to file wage complaints under the *Employment Act* or to seek protection from unfair labour practices, despite their work often being similar to that of junior staff.

The result is a profession where access is, in reality, limited to those with external financial support. This undermines meritocracy and perpetuates systemic inequality, particularly for aspiring lawyers who must relocate to urban centres like Kuala Lumpur.

II. Reasons Pupils Are Not Granted Minimum Remuneration

During his presidency, Salim Bashir stated:

“We are committed to creating a more inclusive legal profession. Pupils should not be treated as free labour. The Bar Council is studying proposals to regulate remuneration more effectively.”⁹

⁸ Legal Profession Act 1976, s 12(2).

⁹ Hailey Chung Wee Kye, ‘Malaysian Bar working on wage scheme for pupillage, says president’ *The Malaysian Insight* (Kuala Lumpur, 27 December 2020) <<https://www.themalaysianinsight.com/s/291919>> accessed 8 August 2025.

There are strong and practical reasons why pupils should be entitled to a minimum level of remuneration, particularly given the realities of their training period.

2.1 Fair pay for equivalent work

Pupils are not mere observers. They are active participants in a firm's daily operations, drafting pleadings, conducting legal research, attending court, assisting in client meetings and managing files. Their work carries real weight and responsibility. To deny them fair remuneration simply because of how their role is classified is to overlook the substance of their contribution.¹⁰

In many cases, pupils shoulder workloads that directly benefit their firms, performing tasks similar to those of junior employees. Some even report extended working hours to meet deadlines. When measured by responsibility and commitment, there is little difference between pupils in law firms and fresh graduates starting careers in other fields such as marketing, engineering or accounting, all of whom are entitled to fair entry-level pay.

For comparison:

- Engineering Graduates: Fresh graduates in mechanical, electrical, and industrial engineering typically earn between RM3,500 and RM5,000 monthly. Those with specialised expertise in automation or robotics may command even higher salaries.¹¹
- Accounting Graduates: Entry-level salaries for accounting graduates generally range from RM3,000 to RM4,500, with higher earnings potential for those holding professional certifications like ACCA or CPA.¹²
- Marketing Executives: Fresh graduates entering the marketing field earn between RM3,000 and RM4,500 per month. Skills in digital marketing and data analytics tend to attract premium salaries.¹³
- Human Resource Executives: New entrants in HR roles typically earn between RM3,000 and RM4,000 monthly, especially if they hold relevant HR certifications.¹⁴

¹⁰ Messrs. Shamil Shakil, 'On Minimum Remuneration and the Professional Treatment of Pupils' (*LinkedIn*, 18 June 2025) <<https://www.linkedin.com/pulse/minimum-remuneration-professional-treatment-pupils-jbufc/>> accessed 8 August 2025.

¹¹ Samantha Toh, 'Fresh Graduate Salary in Malaysia for 2025: What to Expect, Insights and Analysis' (*Job Majestic*, 12 February 2025) <https://www.jobmajestic.com/blog/en/fresh-graduate-salary-malaysia-2025/?utm_source=chatgpt.com> accessed 24 May 2025.

¹² *ibid.*

¹³ *ibid.*

¹⁴ *Ibid.*

In contrast, pupils typically receive monthly allowances ranging from RM1,000 to RM1,500,¹⁵ which fall below the national minimum wage and highlight the financial hardship many face during their mandatory training period. While pupils are still in the learning phase, effective learning requires a stable foundation. A fair wage enables pupils to focus on enhancing their skills without the added stress of financial instability.

2.2 Skyrocketing Living Expenses

It is undeniable that the cost of living has steadily increased over the years. Based on the notional Consumer Price Index, the average annual increase has been 10.9% from 2020 to 2024. Meanwhile, salaries and allowances have not increased proportionately. According to a report by PwC, the living wage in Kuala Lumpur is RM2,967 for a single adult, which is significantly higher than the RM500-RM1,000 that many pupils are paid nowadays.¹⁶

The reality is that the current pupil wage is far below the basic living wage required for a single adult. For students from less affluent families, this creates a major challenge. Not only do parents need to provide financial support during their children's studies, but they are also expected to assist once the students complete their degrees. With such low wages, it is clear that the current pupil salary is insufficient to sustain their daily needs, making it extremely difficult for many to support themselves.

Despite performing professional-level duties, many pupils are paid well below a living wage, which presents a significant challenge for aspiring lawyers, especially those from less privileged backgrounds. This wage disparity makes it challenging for them to sustain themselves during this crucial stage of their careers. While pupils are still in the learning phase, effective learning requires a stable foundation. A fair wage enables pupils to focus on enhancing their skills without the added stress of financial instability.

III. Why Should Pupils Not Be Granted Minimum Remuneration?

Despite ongoing calls for reform, there are still several reasons why the Bar Council of Malaysia has not introduced a mandatory minimum remuneration for pupils, as outlined below.

3.1 Affect Pupil and Small Law Firm

Imposing a minimum remuneration for pupils may increase the operating costs of law firms, which can, in turn, reduce the number of pupillage positions they are willing to offer. This requirement may also indirectly impact pupils in smaller towns and states, where firms may

¹⁵ K. Pakaran, 'Bar Council to set minimum wage for chambering lawyers' *Free Malaysia Today* (Petaling Jaya, 24 December 2024)

<<https://www.freemalaysiatoday.com/category/nation/2024/12/24/bar-council-to-set-minimum-wage-for-chambering-lawyers/>> accessed 24 May 2025.

¹⁶ Malar Odayappan, Thomas Chan and Afiq Fauzi, 'Towards equity: How corporate Malaysia can lead in wage reform' (*PwC Malaysia*, 24 May 2025)

<<https://www.pwc.com/my/en/perspective/esg/250706-how-corporate-malaysia-lead-wage-reform.html>> accessed 24 May 2025.

struggle to afford the mandated allowance. As a result, some pupil candidates might be unable to qualify as lawyers simply because there are not enough law firms able or willing to take them in.

Pupils need a firm to chamber with, and if the minimum allowance is set too high, they may find it difficult to secure a place.¹⁷ Moreover, many small firms are genuinely unable to pay the minimum wage. Therefore, a more flexible approach creates a win-win situation, where pupils can still complete their chambering even if they do not receive offers from large firms, and small firms can engage assistance at a manageable cost.

3.2 Pupillage Serves as Both an Apprenticeship and a Continuation of Education.

Pupillage is a form of 'apprenticeship' and/or an extension of legal education. Therefore, imposing minimum remuneration for pupils could detract from the true purpose of 'pupillage'.

It may also be argued by some lawyers that pupils are provided with a free platform to practise practical legal knowledge, where they are not held responsible for mistakes because they work under the guidance of their masters. While errors can be made during this learning phase, once a pupil qualifies as a lawyer, any mistakes they make will be met with stern reprimands from the judge or clients in court.

According to the Oxford Dictionary, an apprentice is 'a person who is learning a trade from a skilled employer, having agreed to work for a fixed period'. Under this view, pupils are not paying to be actively taught, but rather for the chance to observe and learn from their masters in a real-world setting. The master's priority is to serve clients, not to teach, and in many cases, the pupil's presence may be more of an interruption than an asset.¹⁸

For instance, if you proceed with a case incorrectly, such as failing to file a crucial document within the prescribed time frame, leading to the dismissal of the client's case, the client may suffer substantial harm due to the lawyer's negligence. In such a scenario, the case could be forfeited entirely. How would you explain this outcome to your client? Would you admit that a simple error on your part resulted in these severe consequences? Under the *LPA 1976* and the *Rules of Professional Conduct*, such acts of negligence can severely tarnish your reputation and professional standing, potentially resulting in disciplinary action and irreparably damaging your career.

In other words, pupils are given a golden opportunity to learn beyond the academic realm, gaining practical experience that will shape their future legal careers.

¹⁷ Raevathi Supramaniam, 'Fixing minimum allowance for pupils may affect small firms, Bar president says' (*The Malaysian Bar*, 21 May 2022)

<<https://www.malaysianbar.org.my/article/news/legal-and-general-news/legal-news/fixing-minimum-allowance-for-pupils-may-affect-small-firms-bar-president-says>> accessed 24 May 2025.

¹⁸ Fahri Azzat, 'A Pupil's Remuneration' (From the Bar Stool, 23 November 2020)

<<https://fromthebarstool.life/2020/11/23/pupils-remuneration/>> accessed 24 May 2025.

3.3 Cultural Resistance

Perhaps the most understated barrier to reform lies in the legal profession's own internal resistance, particularly among senior practitioners. Many current masters underwent pupillage under similar unpaid or low-paid conditions and have come to view such hardship as a rite of passage.

There exists a deeply rooted cultural belief that early struggle builds resilience, and that introducing entitlement to remuneration would erode the spirit of sacrifice traditionally associated with the formative years of legal training. This entrenched mindset continues to shape attitudes within the profession, making it difficult to achieve consensus on pupil wage regulation, even within Bar Council deliberations.

IV. The Approaches Out There to Solve the Issue

In order to fight for the minimum remuneration for pupils in Malaysia, there are a few approaches that can be carried out to improve this perspective, making it fairer and just for the pupils, as stated below.

4.1 Young Lawyers Movement

The Young Lawyers Movement has undertaken many activities to advocate for minimum wages for pupils. This article will highlight only a few major incidents or dramatic approaches. Before that, it is necessary to explain what the 'Young Lawyers Movement' is. The Young Lawyers Movement (YLM) in Malaysia has been actively advocating for the implementation of a mandatory minimum remuneration for pupils (chambering students). Their efforts aim to address the financial challenges faced by pupils during their mandatory training period.

Firstly, YLM has been a key advocate for minimum remuneration for pupils in Malaysia. In 2020, they launched a Change.org petition, gathering over 4,200 supporters and presented it to the National Young Lawyers and Pupils Committee and several State Bar Committees. Their efforts led to the Malaysian Bar recognising the issue and conducting surveys to gather data on remuneration. In other words, the YLM's actions have directly contributed to the reform of *LPA 1976*, allowing enforcement of minimum pay. Despite challenges, such as balancing the needs of small firms, the YLM's campaign has sparked important discussions on fair pay, promoting socio-economic inclusion and professional development for young lawyers and pupils.¹⁹

Secondly, during the Malaysian Bar's Extraordinary General Meeting (EGM) in May 2022, representatives from the YLM, including spokesman Goh Cia Yee, strongly advocated for the implementation of a binding minimum remuneration for pupils. They argued that the existing guidelines were insufficient and called for enforceable rules to prevent exploitation. YLM

¹⁹ Lawyers & Pupils for Minimum Pay, 'Implement minimum pay for pupils in Malaysia' (*Change.org*, 20 November 2020) <<https://www.change.org/p/malaysian-bar-implement-minimum-pay-for-pupils-in-malaysia>> accessed 24 May 2025.

emphasised that justice within the legal profession should encompass socio-economic rights, including fair compensation for pupils.²⁰

Thirdly, YLM in Malaysia has been at the forefront to secure fair remuneration for pupils by pushing for legislative amendments to the *LPA 1976*. They have called for the Act to be revised to empower the Bar Council to enforce a binding minimum allowance for chambering students, addressing the longstanding issue of low or no pay for professional-level work. YLM has engaged directly with legal stakeholders and policymakers, conducted nationwide surveys to support their proposals, submitted motions at the Malaysian Bar's AGM, and participated in public forums and media engagements to raise awareness. Their advocacy contributed to the Bar Council's proposal to amend *Section 77 of the LPA 1976*, with the aim of enabling the Council to regulate pupil remuneration more effectively.²¹

4.2 Amendment made by Bar Council on the Legal Professional Act (LPA).

Before the amendment to the *LPA 1976*, *Section 77(1)* did not expressly empower the Bar Council to regulate or enforce minimum remuneration for pupils. As a result, many law firms pay pupils extremely low allowances, as little as RM500, or in some instances, offer no allowance at all.

However, following the amendment introduced by the Bar Council, *Section 77(1)* now grants statutory authority to regulate 'fees, salaries, allowances, and working conditions for lawyers and pupils'. This significant change means the Bar Council is now legally empowered to mandate and enforce minimum remuneration standards, ensuring a more equitable and sustainable framework for those undergoing pupillage.²²

4.3 Bar Council

To support the forthcoming implementation of minimum remuneration for pupils, the Malaysian Bar, on 22 November 2024, announced the engagement of an independent economic advisory firm to develop a recommended remuneration framework.

This initiative stems from a 2021 resolution affirming the Bar's commitment to protecting pupils' welfare through fair compensation, despite the Bar Council's prior lack of statutory authority under the pre-amended *LPA 1976*.

In December 2024, the advisory firm conducted two confidential nationwide surveys, one targeting law firms and the other directed at pupils and first-year legal assistants, to gather

²⁰ Ida Lim, 'Young lawyers push for Malaysian Bar to have binding minimum pay for chambering students' *Malay Mail* (Kuala Lumpur, 28 May 2022) <<https://www.malaymail.com/news/malaysia/2022/05/28/young-lawyers-push-for-malaysian-bar-to-have-binding-minimum-pay-for-chambering-students/9279>> accessed 24 May 2025.

²¹ Ibid.

²² 'What Changes to Legal Profession Act Entails' *Daily Express* (Kota Kinabalu, 24 April 2024) <<https://www.dailyexpress.com.my/read/5885/what-changes-to-legal-profession-act-entails/>> accessed 24 May 2025.

accurate data on existing pay structures. The purpose of this research was to establish a baseline, identify regional disparities, and recommend appropriate minimum allowance rates, including a formula for periodic adjustments.²³

V. Minimum Remuneration for Pupils in Other Jurisdictions (Other Countries)

5.1 United Kingdom

The Bar Standards Board's Bar Qualification Rules, introduced in 2019, require all pupil barristers to be paid a minimum award during their pupillage. This is to ensure their income reflects the Living Wage Foundation's recommendations.²⁴

From 1 January 2024, the minimum annual award will be £23,078 for pupillages based in London and £21,060 for those outside London. These figures are intended to align with the cost of living, ensuring that pupils receive enough financial support to manage their day-to-day expenses throughout the course of their training.²⁵

5.2 Hong Kong

In Hong Kong, as of 1st September 2019, pupils undertaking pupillage must be paid a minimum monthly honorarium of HK\$6,000, as stated in *paragraph 11.9A of the Hong Kong Bar Association's Code of Conduct*.²⁶ Additionally, if a pupil master fails to make this payment without a valid reason, it may be considered a professional misconduct or a breach of proper professional standards under *paragraph 11.13*.²⁷

VI. Conclusion

In toto, it is understood that pupillage is a learning phase, and financial gain should not necessarily be the primary consideration when choosing a law firm. However, the Malaysian Bar Council must also ensure that the rights of pupils are not exploited by their masters. This is

²³ Malaysian Bar, 'Circular No 395/2024 | Survey on Minimum Remuneration for Pupils' (*Malaysian Bar*, 22 November 2024)

<https://www.malaysianbar.org.my/cms/upload_files/document/Circular%20No%20395-2024.pdf> accessed 24 May 2025.

²⁴ Bar Standards Board, 'Minimum Pupillage Award from 1 September 2019 Announced' (*Bar Standards Board*, 6 December 2018)

<<https://www.barstandardsboard.org.uk/resources/minimum-pupillage-award-from-1-september-2019-announcement.html>> accessed 24 May 2025.

²⁵ Ibid.

²⁶ Bar Standards Board, 'BSB Announces Minimum Pupillage Award from 1 January 2024' (*Bar Standards Board*, 27 October 2023)

<https://www.barstandardsboard.org.uk/resources/bsb-announces-minimum-pupillage-award-from-1-january-2024.html> accessed 24 May 2025.

²⁷ Hong Kong Bar Association, *Code of Conduct of the Bar of the Hong Kong Special Administrative Region* (14 November 2018, updated 11 February 2025)

<https://www.hkba.org/uploads/d319cd0a-c88e-4b1d-89db-affa2beb3096.pdf> accessed 24 May 2025.

crucial, as pupils often perform tasks equivalent to those of regular employees, despite being new to the profession.

Therefore, the Malaysian Bar Council should consider amending *section 12(3) of the LPA 1976* to clearly define the minimum remuneration that must be provided to pupils. This would prevent law firms from offering unreasonably low allowances and ensure that pupils are treated fairly during their chambering period.

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