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Corporate Tax 2026

A practical cross-border resource to inform legal minds

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1 Tax Treaties and Residence

1.1 How many income tax treaties are currently in force in your jurisdiction?

Singapore currently has over 100 comprehensive Avoidance of Double Taxation treaties ("DTAs") in force.¹

1.2 Do they generally follow the OECD Model Convention or another model?

Singapore's recent DTAs generally follow the OECD Model Convention, with some modifications.

1.3 Has your jurisdiction signed the tax treaty MLI and deposited its instrument of ratification with the OECD?

Yes. Singapore deposited its instrument of ratification on 21 December 2018, and the Multilateral Instrument ("MLI") entered into force on 1 April 2019.

1.4 Do they generally incorporate anti-abuse rules?

Yes. Treaties amended by the MLI incorporate the BEPS "principal purpose test" ("PPT"). Separately, section 33 of the Income Tax Act 1947 ("ITA") establishes Singapore's domestic general anti-avoidance rule ("GAAR").

1.5 Are treaties overridden by any rules of domestic law (whether existing when the treaty takes effect or introduced subsequently)?

DTAs do not automatically override Singapore's domestic law. However, once a DTA is incorporated into Singapore law under section 49 of the ITA, it has the force of domestic legislation, and its provisions prevail to the extent of any inconsistency with the ITA.

1.6 What is the test in domestic law for determining the residence of a company? Has the application of the test been modified in response to COVID-19?

A company is regarded as tax resident in Singapore for a particular Year of Assessment ("YA") if the control and management of its business were exercised in Singapore during the preceding calendar year. This is a question of fact and generally turns on where high-level strategic and policy decisions are made – typically at meetings of the board of directors. Temporary COVID-19 concessions applied for YAS 2021 and 2022 to prevent travel restrictions from inadvertently affecting a company's residence status, but these concessions have not been extended beyond YA 2022.

1.7 Is your jurisdiction's tax authority expected to revisit the status of dual resident companies in cases where the MLI changes the treaty "tiebreaker"?

Where the MLI modifies a treaty's corporate residence tiebreaker (for example, replacing the "place of effective management" test with a mutual agreement procedure ("MAP")-based approach), the Inland Revenue Authority of Singapore ("IRAS") may reassess a company's residence based on the specific facts and circumstances.

2 Transaction Taxes

2.1 Are there any documentary taxes in your jurisdiction?

Yes. Singapore imposes stamp duty on a wide range of instruments executed in Singapore, or executed outside Singapore and received in Singapore, that relate to property or interests situated in Singapore. These include, among others, instruments involving transfers of land, shares, leases, and other transactions evidencing rights in property.²

2.2 Do you have Value-Added Tax (VAT), or a similar tax? If so, at what rate or rates? Please note any rate reduction in response to COVID-19.

Yes. Singapore imposes a Goods and Services Tax ("GST") on the supply of goods and services in Singapore and on the importation of goods. The standard rate is 9%, effective from 1 January 2024.

2.3 Is VAT (or any similar tax) charged on all transactions or are there any relevant exclusions?

GST does not apply to exempt supplies, which include most financial services, the sale or lease of unfurnished residential property, and investment-grade precious metals. Certain transactions, such as private or non-business dealings, are treated as out-of-scope supplies. In addition, specific supplies, such as exports of goods and qualifying international services, are zero-rated.

2.4 Is it always fully recoverable by all businesses? If not, what are the relevant restrictions?

Generally, input tax is recoverable only to the extent that it is incurred in making taxable supplies by a GST-registered business. Businesses that make both taxable and exempt supplies (i.e., partially exempt businesses) may recover input tax only on a proportionate basis under the partial exemption rules. Input tax is specifically disallowed on certain expenses, including staff medical costs (unless mandated by law), private motor-car expenses, club or association subscriptions, and benefits provided to family members.

2.5 Does your jurisdiction permit VAT grouping? If so, how does this apply where a company in one jurisdiction has an establishment in another?

Yes. Singapore permits GST group registration under section 30 of the GST Act, allowing two or more entities under common control to be treated as a single taxable person for GST purposes. A representative member is nominated to file a single consolidated GST return on behalf of the group.

Supplies between Singapore establishments of group members are disregarded for GST purposes, though reverse charge applies where a local group member procures services from an overseas establishment or overseas group member. Since 1 January 2020, the local recipient must account for GST on such imported services.

All members are jointly and severally liable for GST due from the group, and input-tax recovery and partial-exemption rules apply on a group-wide basis, which may reduce overall recoverability where any member makes exempt supplies.

2.6 Are there any other noteworthy transaction taxes or indirect taxes that are payable by companies?

Yes. Companies may be subject to several other transactionbased and indirect taxes in Singapore:

- Stamp duties: Buyer's Stamp Duty ("BSD") is payable on the acquisition of property, with rates depending on whether the property is residential or non-residential. For residential properties, Additional Buyer's Stamp Duty ("ABSD") may also apply.
- Additional Conveyance Duties ("ACD"): The disposal of equity interests in property-holding entities that own primarily residential properties in Singapore are subject to ACD on the value of the underlying residential property interest
- Lease duty: Lease instruments are subject to stamp duty where the average annual rent exceeds S\$1,000.
- In addition, certain sectors may be subject to specific levies (e.g., the foreign worker levy and motor-vehicle-related taxes), though these are not strictly transaction taxes.

2.7 Are there any other indirect taxes of which we should be aware?

This is not applicable.

3 Cross-border Payments

3.1 Is any withholding tax imposed on dividends paid by a locally resident company to a non-resident?

No. Singapore does not impose withholding tax on dividend payments under its one-tier corporate tax system. Accordingly, dividends paid by a Singapore-resident company are exempt from further tax in the hands of shareholders, whether resident or non-resident, notwithstanding that some of Singapore's DTAs prescribe notional dividend-withholding rates.

3.2 Would there be any withholding tax on royalties paid by a local company to a non-resident?

Yes. Royalties or other lump-sum payments made to a non-resident for the use of or the right to use movable property, including intellectual property, are subject to withholding tax at 10% of the gross payment, unless reduced or exempted under an applicable DTA.

3.3 Would there be any withholding tax on interest paid by a local company to a non-resident?

Yes. Interest, commissions, fees, or other payments in connection with any loan or indebtedness made to a non-resident are generally subject to withholding tax at 15% of the gross amount, unless a reduced rate applies under an applicable DTA.

Where the interest income is derived by a non-resident through operations carried on outside Singapore, the payment may be exempt from withholding tax under section 12(6) of the ITA.

3.4 Would relief for interest so paid be restricted by reference to "thin capitalisation" rules?

No. Singapore does not have a thin capitalisation regime. Interest deductibility is governed by the general deduction rule under section 14(1) of the ITA and, for related-party loans, the arm's-length principle under Singapore's transfer pricing rules.

3.5 If so, is there a "safe harbour" by reference to which tax relief is assured?

This is not applicable, as Singapore has no thin-capitalisation rules. That said, from 1 January 2025, the IRAS allow related-party domestic loans between Singapore taxpayers that are not in the business of borrowing and lending to apply the IRAS indicative margin as a safe harbour for determining the arm's-length interest rate. For cross-border loans, the indicative margin may still be used only where the total principal does not exceed \$\$15 million.

3.6 Would any such rules extend to debt advanced by a third party but guaranteed by a parent company?

This is not applicable, as Singapore does not have thincapitalisation rules. However, transfer pricing principles may apply where a parent-company guarantee confers an economic benefit on the borrower, requiring an arm's-length guarantee fee

3.7 Are there any other restrictions on tax relief for interest payments by a local company to a non-resident?

Please see our response to question 3.4 above. Interest deductions may be denied or limited if the borrowing is not wholly and exclusively incurred in the production of taxable income under section 14(1) of the ITA, or if the loan terms are not at arm's length under Singapore's transfer pricing rules.

3.8 Is there any withholding tax on property rental payments made to non-residents?

Yes. Rent or other payments to a non-resident for the use of movable property are subject to 15% withholding tax, unless a lower rate applies under a tax treaty.

Rentfrom immovable property is instead taxed as Singaporesourced income in the hands of the non-resident owner and is not subject to withholding tax.

3.9 Does your jurisdiction have transfer pricing

Yes. Singapore has comprehensive transfer pricing rules and documentation requirements consistent with the arm's-length principle, which is legislated in section 34D of the ITA and supported by the Income Tax (Transfer Pricing Documentation) Rules 2018. The IRAS publishes detailed guidelines that set out administrative and compliance expectations.

3.10 Can companies in your jurisdiction obtain unilateral, bilateral or multilateral advance pricing agreements?

Yes. Singapore offers unilateral, bilateral, and multilateral Advance Pricing Agreements ("APAs") as part of its formal programme administered by the IRAS. The APA process is detailed and can be resource-intensive, typically suited for high-value or high-risk related-party transactions. Bilateral and multilateral APAs are conducted through Singapore's tax treaty network via the MAP framework.

4 Tax on Business Operations: General

4.1 What is the headline rate of tax on corporate profits?

The corporate income tax rate in Singapore is 17%. In practice, the effective tax rate for many companies may be lower due to various partial exemptions, rebates, and tax incentive schemes available under Singapore's tax regime.

4.2 Is the tax base accounting profit subject to adjustments, or something else?

Yes. Chargeable income is computed based on accounting profit, adjusted to exclude non-taxable receipts, add back non-deductible expenses, and deduct capital allowances, unutilised losses, and other reliefs. As a result, taxable income often differs from the net profit reported in financial statements.

4.3 If the tax base is accounting profit subject to adjustments, what are the main adjustments?

The main tax adjustments include:

- adding back non-deductible or capital expenses and disallowable provisions;
- deducting non-taxable or separately assessed income; and
- claiming capital allowances, and deducting unutilised losses and approved donations.

4.4 Are there any tax grouping rules? Do these allow for relief in your jurisdiction for losses of overseas subsidiaries?

Yes. Singapore has a group relief system under which a company may transfer its current-year unutilised items – namely capital allowances, trade losses, and approved donations – to offset the assessable income of another Singapore-incorporated company within the same group. To qualify, the companies must have at least 75% common ownership and the same financial year-end.

This relief is available only to Singapore-incorporated companies; losses of overseas subsidiaries cannot be utilised under the group relief system.

4.5 Do tax losses survive a change of ownership?

Yes, subject to the shareholding test. Unutilised capital allowances, trade losses, and approved donations may be deducted against future income only if there is no substantial change (i.e., more than 50%) in the ultimate shareholders and their shareholdings as at the relevant comparison dates under the ITA.

The Comptroller of Income Tax may, however, waive the shareholding test where the company continues to carry on the same trade or business, and the change in ownership was not for the purpose of deriving a tax benefit. Such waivers are granted on a case-by-case basis.

4.6 Is tax imposed at a different rate upon distributed, as opposed to retained, profits?

No. Singapore operates a one-tier corporate tax system, under which tax is imposed at the corporate level only. Dividends paid by Singapore-resident companies are exempt from further tax in the hands of shareholders, so there is no difference in tax rate between distributed and retained profits.

4.7 Are companies subject to any significant taxes not covered elsewhere in this chapter — e.g. tax on the occupation of property?

Yes. Property tax is levied annually on the ownership of immovable property in Singapore under the Property Tax Act 1960. The tax is based on the property's annual value, which reflects its estimated market rent.

In addition, Singapore imposes a Carbon Tax on industrial facilities with annual direct greenhouse-gas emissions of at least 25,000 tonnes of carbon-dioxide equivalent (tCO₂e). The Carbon Tax applies at the following statutory rates:

- S\$25 per tonne from 2024 to 2025;
- S\$45 per tonne from 2026 to 2027; and
- rising to between S\$50 and S\$80 per tonne by 2030, subject to periodic review.

5 Capital Gains

5.1 Is there a special set of rules for taxing capital gains and losses?

Singapore generally does not impose tax on capital gains. Gains are taxable only if they are income in nature, which is generally determined based on factors such as the taxpayer's intention, frequency of transactions, and manner of realisation.

From 1 January 2024, under section 10L of the ITA, gains from the disposal of foreign assets are taxable when received or deemed received in Singapore if the disposing entity lacks adequate economic substance in Singapore or if the gains relate to foreign intellectual property rights.

5.2 Is there a participation exemption for capital gains?

Singapore does not have a formal participation-exemption regime other than the economic substance requirement for Singapore companies disposing of foreign assets as set out in section 10L of the ITA.

There are, however, certain capital gains safe harbours, under section 13W of the ITA, whereby a Singapore-resident company may obtain certainty of non-taxation for gains arising from the disposal of equity investments if, immediately before disposal, it has held at least 20% of the ordinary shares in the investee company for a continuous 24-month period and the investee is not principally engaged in property development or trading.

From 1 January 2026, the scheme will be expanded to cover qualifying preference shares and permit group-basis aggregation to meet the 20% ownership test.

5.3 Is there any special relief for reinvestment?

No. Singapore does not provide any relief for capital gains, as it does not impose a general capital gains tax.

5.4 Does your jurisdiction impose withholding tax on the proceeds of selling a direct or indirect interest in local assets/shares?

No. Singapore does not impose withholding tax on proceeds from the sale of shares or other capital assets.

6 Local Branch or Subsidiary?

6.1 What taxes (e.g. capital duty) would be imposed upon the formation of a subsidiary?

No capital duty is imposed on the incorporation of a company or the issuance of shares in Singapore. However, stamp duty may apply where shares, immovable property, or other assets are transferred into the subsidiary, and nominal filing fees are payable to the Accounting and Corporate Regulatory Authority.

6.2 Is there a difference between the taxation of a local subsidiary and a local branch of a non-resident company (for example, a branch profits tax)?

No. Singapore does not impose a branch-profits tax. Both a

Singapore-incorporated subsidiary and the Singapore branch of a foreign company are taxed on income accruing in or derived from Singapore at the same corporate income tax rate of 17%.

A subsidiary, being a separate legal entity, may qualify as a Singapore tax resident if its control and management are exercised in Singapore. This allows access to DTA benefits and tax exemption schemes such as the Partial Tax Exemption ("PTE") and Start-Up Tax Exemption ("SUTE").

A branch, by contrast, is an extension of its foreign head office and is generally not regarded as tax-resident in Singapore, since control and management rest with the overseas parent. Consequently, a branch ordinarily does not qualify for DTA benefits or domestic tax-exemption schemes.

6.3 How would the taxable profits of a local branch be determined in its jurisdiction?

The branch is treated as a distinct and separate enterprise from its head office and related entities and is taxed only on income and expenses attributable to its Singapore operations.

6.4 Would a branch benefit from double tax relief in its jurisdiction?

Ordinarily, no, since a Singapore branch is not treated as a tax resident and therefore cannot obtain a Certificate of Residence ("COR") to claim treaty relief.

In exceptional cases, the IRAS may issue a COR to a non-Singapore incorporated company or Singapore branch if it can demonstrate that:

- control and management of the company's business are exercised in Singapore (i.e., strategic decisions are made in Singapore by local directors or key officers); and
- there are valid commercial reasons for operating as a branch rather than incorporating locally.

Such cases are rare and assessed on a case-by-case basis, typically requiring evidence of substantive decision-making, Singapore-based directors or executives, and operational activities in Singapore.

6.5 Would any withholding tax or other similar tax be imposed as the result of a remittance of profits by the

No. Singapore does not impose withholding tax or any other remittance tax on the transfer of profits by a branch to its foreign head office. Profits are taxed only once when earned in Singapore.

7 Overseas Profits

7.1 Does your jurisdiction tax profits earned in overseas branches?

Singapore generally does not tax profits earned by overseas branches, unless those profits are received or deemed received in Singapore. Such income may qualify for exemption under the foreign-sourced income exemption ("FSIE") regime in section 13(8) of the ITA, provided the conditions in section 13(9) of the ITA are satisfied:

subject to tax condition: the foreign-sourced income has been subject to tax in the foreign jurisdiction from which it is received (whether directly or indirectly, and including cases where the income is exempt because of substantive business activities there);

- headline-tax-rate condition: the highest corporate income-tax rate of that foreign jurisdiction is at least 15% at the time the income is received in Singapore; and
- beneficial-exemption condition: the Comptroller of Income Tax is satisfied that granting the exemption is beneficial to the Singapore-resident taxpayer.

If these conditions are not met, the income will be taxable when received in Singapore. In such cases, foreign tax credits ("FTCs") may be available under sections 50 or 50A of the ITA (treaty-based or unilateral relief) for foreign tax paid on the same income.

7.2 Is tax imposed on the receipt of dividends by a local company from a non-resident company?

Dividends received in Singapore by a Singapore tax resident company from a non-resident company are generally taxable when received or deemed received in Singapore, unless exempt under the FSIE regime. To qualify, the same three conditions in section 13(9) of the ITA (subject-to-tax, headline-tax-rate, and beneficial-exemption conditions) must be met. Where these conditions are not satisfied, the dividend will be taxable, although FTCs may be available under treaty-based or unilateral relief provisions.

7.3 Does your jurisdiction have "controlled foreign company" rules and, if so, when do these apply?

Singapore does not have controlled foreign company rules.

8 Taxation of Commercial Real Estate

8.1 Are non-residents taxed on the disposal of commercial real estate in your jurisdiction?

Singapore does not impose a capital gains tax, so non-residents are generally not taxed on gains arising from the disposal of commercial real estate.

However, where a non-resident is regarded as a property trader or carries on a business of dealing in real property, such gains may be revenue in nature and therefore taxable as trading income.

8.2 Does your jurisdiction impose tax on the transfer of an indirect interest in commercial real estate in your jurisdiction?

Singapore does not impose income tax on the indirect transfer of interests in entities holding commercial real estate.

However, stamp duty implications may arise. Under the Stamp Duties (Additional Conveyance Duties) Rules, ACD apply to transfers of equity interests in property-holding entities that own primarily residential properties in Singapore, but not to entities that hold commercial or industrial properties.

8.3 Does your jurisdiction have a special tax regime for Real Estate Investment Trusts (REITs) or their equivalent?

Yes. Singapore provides tax transparency for qualifying REITs under sections 43(2A) and 45G of the ITA.

A REIT that derives rental or specified income from Singapore immovable property is not taxed at the trust level if it distributes at least 90% of its taxable income to unitholders in the same year. The distributions are then taxed at the investor level:

- individuals (non-traders): exempt;
- qualifying non-resident non-individuals: 10% final withholding tax; and
- corporate investors: taxed at their respective corporate rate.

Approved sub-trusts that satisfy the same conditions are accorded similar tax-transparent treatment.

9 Anti-avoidance and Compliance

9.1 Does your jurisdiction have a general anti-avoidance or anti-abuse rule?

Yes. Section 33 of the ITA empowers the Comptroller of Income Tax to disregard or vary any arrangement that is artificial, contrived, or lacks commercial substance and is designed to obtain a tax advantage. Since 2023, a 50% surcharge may be imposed on the amount of tax avoided under such arrangements. Similar provisions exist in relation to other taxes such as GST and stamp duties.

9.2 Is there a requirement to make special disclosure of avoidance schemes or transactions that meet hallmarks associated with cross-border tax planning?

No. Singapore does not have a mandatory disclosure regime requiring taxpayers or advisors to report avoidance schemes or cross-border arrangements meeting specified hallmarks.

9.3 Does your jurisdiction have rules that target not only taxpayers engaging in tax avoidance but also anyone who promotes, enables or facilitates the tax avoidance?

No. Singapore has no promoter-penalty regime targeting facilitators of avoidance. However, criminal liability may arise under section 96 of the ITA for abetting, aiding or conspiring in tax evasion, though this does not extend to tax-avoidance arrangements.

9.4 Does your jurisdiction encourage "co-operative compliance" and, if so, does this provide procedural benefits only or result in a reduction of tax?

Yes. The IRAS promotes voluntary compliance through frameworks such as the Tax Risk Management and Control Framework for Corporate Income Tax ("CTRM") and the Assisted Compliance Assurance Programme ("ACAP") for GST.

These programmes are voluntary self-assessment programmes reviewed by the IRAS every three years, and provide procedural benefits but do not affect tax liability.

9.5 Are there rules requiring special disclosure where a company is taking a position on a tax issue that is uncertain (open to dispute from a technical perspective)?

No. There is no formal regime requiring disclosure of uncertain tax positions.



10 BEPS, Tax Competition and the Digital Economy

10.1 Has your jurisdiction implemented the OECD's recommendations that came out of the BEPS project?

Yes. Singapore has implemented core BEPS 2.0 Pillar Two measures through the Multinational Enterprise (Minimum Tax) Act 2024, introducing a Domestic Top-Up Tax ("DTT") and Income Inclusion Rule ("IIR") effective from 1 January 2025. Implementation of the Undertaxed Profits Rule ("UTPR") will be considered subsequently.

10.2 Has your jurisdiction adopted any legislation to tackle BEPS that goes beyond the OECD's recommendations?

Yes. The Refundable Investment Credit ("RIC"), announced in Singapore's 2024 Budget, supports companies undertaking high-value, substantive economic activities in Singapore. The RIC is designed as a Qualified Refundable Tax Credit ("QRTC") under the OECD Pillar Two framework, meaning it is recognised as a covered tax for minimum-tax purposes and does not reduce a group's effective tax rate below 15%.

10.3 Does your jurisdiction support information obtained under Country-by-Country Reporting (CBCR) being made available to the public?

No. Singapore does not make Country-by-Country Reporting ("CbCR") information publicly available. Such reports are exchanged confidentially between competent authorities.

10.4 Does your jurisdiction maintain any preferential tax regimes such as a patent box?

Singapore does not have a patent box regime. Instead, it maintains several broad-based incentive regimes that grant reduced tax rates or exemptions for qualifying activities that contribute to Singapore's economic development.

Key examples include the Pioneer Certificate Incentive ("PC") and the Development and Expansion Incentive ("DEI"), which offer concessionary rates for income derived from approved high-value manufacturing, services, or head-quarters activities carried out in Singapore. The Intellectual

Property Development Incentive ("IDI") further supports innovation-driven activities but is structured in line with the OECD's substance-based "nexus approach" rather than a patent box model.

Singapore also has various fund management incentives under section 13 of the ITA, which form a key pillar of Singapore's asset- and wealth-management ecosystem. These include the section 13O (onshore), section 13D (offshore) and section 13U (enhanced-tier) schemes that exempt specified income from designated investments earned by qualifying funds managed or advised by Singapore-based fund managers. These incentives make Singapore an attractive jurisdiction for funds, family offices, and private wealth structures seeking operational substance and tax certainty.

There are also incentives such as the Global Trader Program, which provides concessionary tax rates on qualifying income related to physical trading and commodities for commodity trading entities, and the various Maritime Sector Incentives, which provide tax exemptions, tax concessions or an alternative basis of taxation for qualifying shipping and maritime-related enterprises.

10.5 Has your jurisdiction taken any unilateral action to tax digital activities or to expand the tax base to capture digital presence?

Singapore has not introduced a digital services tax ("DST") or any other unilateral turnover-based digital tax. Instead, it broadened its existing GST regime to keep pace with the digitalisation of commerce. From 1 January 2020, GST applies to cross-border supplies of digital services made by overseas vendors to Singapore consumers under the Overseas Vendor Registration ("OVR") regime. From 1 January 2023, GST was further extended to low-value imported goods supplied by overseas merchants, electronic marketplaces, and redeliverers.

Endnotes

- IRAS | List of DTAs, Limited DTAs & EOI Arrangements, https://www. iras.gov.sg/taxes/international-tax/international-tax-agreementsconcluded-by-singapore/list-of-dtas-limited-dtas-and-eoi-arrangement s?pg=1&indexCategories=all
- 2 Stamp Duties Act 1929 Singapore Statutes Online, https://sso. agc.gov.sg/Act/SDA1929



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His practice focuses on designing and implementing tax-efficient and trade-compliant structures for manufacturing, distribution, and investment flows, with particular emphasis on the semiconductor, technology, life sciences, and industrial sectors.

Benedict's representative experience includes: advising leading semiconductor and technology companies on regional supply chain structuring, customs valuation, and U.S. export control compliance; structuring VAT-efficient manufacturing arrangements for biotechnology and life sciences companies; and assisting multinational manufacturing groups in leveraging ASEAN and bilateral free trade agreements for tariff optimisation and rules of origin compliance.

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- · Tax Treaties and Residence
- · Transaction Taxes
- · Cross-border Payments
- · Tax on Business Operations: General
- · Withholding, Stamp and Other Taxes; Notarial and Other Costs
- · Local Branch or Subsidiary?
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- · Taxation of Commercial Real Estate
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