

# Singapore Budget 2023 Commentary – Our Roadmap to Adapt and Thrive in a Post-Pandemic World



## FOREWORD

### Our Roadmap To Adapt And Thrive In A Post-Pandemic World

Singaporeans may be forgiven in hoping for some additional love from the Government considering that the Budget announcement falls on Valentine's Day.

Especially since we have been cheery beneficiaries of recent consecutive generous budgets for the past few years (for appropriate economic / societal reasons in view of the various adverse effects caused by the COVID-19 pandemic). However, after coming out from the pandemic relatively unscathed and with Singapore entering into its third budget of its five-year fiscal term in FY2023, **it is clear that there is a need for a "balanced budget" to account for a 1.4 percent deficit accumulated in the first two years**, whilst wrestling simultaneously with various pressing issues of today and tomorrow.

Much has been said about inflation. Couple this with other external issues such as rising structural changes in the global economy where we have been experiencing a shift from global economic integration towards a more contentious and fragmented world, alongside the ongoing conflict in Eastern Europe and the recent reopening of borders in China. One should then expect upward pressure on prices to be maintained in the foreseeable

future. This is not to forget the increase in the Goods and Services Tax rate from 7% to 9% - to which, one percentage point in 2023 has been implemented (to 8%) and another one on 1 January 2024.

**Domestically, we will need to invest and remain economically and technologically relevant in a post-pandemic world.** The country would need more resources to address her growing needs, including taking care of a rapidly ageing population to which healthcare costs/needs will naturally rise in tandem, the need to refresh and update our country's infrastructure, strengthening our social compact and the urgent need to address climate change. All of these will drive structural increases in the country's expenditure in this decade and beyond.

To this end, the Singapore Budget Statement for 2023, which was unveiled by our Deputy Prime Minister and Minister for Finance, Mr Lawrence Wong on 14 February 2023 was crafted for this purpose – **to tackle an environment where the only certainty seems to be elevated costs to Singaporeans, increasing healthcare needs, a widening income / wealth gap and a high level of unpredictability with the global economy enveloped within an era of rapid digitalisation.**

Budget 2023 appears to be more similar to pre-pandemic Budgets than those seen in recent years. One that has taken in a longer-term view for businesses and focusing on raising productivity / competitiveness, even as it tackles near-term cost concerns.

Immediate support to help Singaporeans to cope with higher inflation and to manage the cost of living continues to come from schemes borne out of the S\$8 billion Assurance Package that was previously announced in previous Budget(s). Additional Community Development Council vouchers are going to be allocated to every household, alongside other cash benefits, such as the Cost-of-Living payments, and other support measures, such as U-Save rebates, GST vouchers and Child Development Account top-ups. These enhancements would essentially cushion the entire increases in spending due to inflation and the GST hike for low-income households and substantially for middle-income households. In addition, help has also been extended to the lower-income and vulnerable groups, through various schemes such as the **Progressive Wage Credit Scheme** and the **Senior Employment Credit**, amongst others.

The Government will co-fund the increases that employers provide to resident lower-wage employees and provide wage offsets

to help employers employ Singaporean workers aged 55 and above as they adjust to higher retirement and re-employment age respectively. Pandemic-era support is retracted and rightly so, now that the country has reverted to Dorscon green and **with a sharp and synchronised monetary policy tightening globally by major central banks, this indicates a weaker global economic outlook in 2023.**

The Government is likely to conserve fiscal fire power in this regard and avoid rolling out the heavy artillery (for now) in the event where the economic environment deteriorates further and a global recession materialises. Such funds previously allocated for pandemic-era support may be diverted to assist the local economy through their drawer plans.

From a business front, challenges continue to ensue. Manpower being one and the other being operating in the midst of a higher interest rate environment. **Enhancements to the Progressive Wage Credit Scheme fund by way of an additional top up of S\$2.4 billion has been committed. The Government will continue to co-fund support for wage increases of lower-wage employees with gross monthly salaries of up to S\$3,000.**



Further, to encourage workers to remain relevant through trainings or retraining, especially in a disruptive and changing business / international order where being relevant remains imperative and where the possibility of remote work remains popular in which Singaporeans will find themselves not only competing with foreigners entering the country but also with those who may be able to work remotely from abroad, the Government will continue to study several policy moves to further strengthen its SkillsFuture ecosystem, which will in turn translate into good employment outcomes for workers.

With Covid slowly but surely becoming an endemic and the general positive observations of borders reopening, **businesses are now encouraged to re-ignite its internationalisation plans to increase their competitiveness.** To this end, the scope of the existing Double Tax Deduction Scheme for Internationalisation has been enhanced in which “E-commerce” has been included as a new qualifying activity. Briefly, the Government has recognised that e-commerce is essential in this day and age in helping companies to overcome initial challenges in their internationalisation efforts. As such, **e-commerce campaign startup expenses incurred will be allowed a 200% enhanced deduction,** subject to conditions.

Apart from the aforesaid, help via the **Enterprise Innovation Scheme** was introduced to encourage businesses to engage in research and development, innovation and capability development activities. Broadly, **businesses can expect to enjoy 400% deduction / capital allowances on costs incurred for various prescribed activities,** with an option to convert a portion of the costs incurred to a non-taxable cash payout, subject to conditions.

Even with all the love that the Government has seemingly put together above and showed to her countrymen, it bears to note that the overarching principle of fiscal prudence cannot be ignored since that underpins the reason as to why the recent 1 percentage point hike in GST in January was implemented. This is in light of various pressing considerations such as the country’s ageing population, the need for infrastructure renewal and where healthcare expenditure continues to grow over the medium to long term, also not forgetting to factor current commitments to initiatives such as uplifting lower-wage workers and improving early childhood education. All of which will invariably affect public finances. As such, in the last section of Mr Wong’s speech, it is no surprise when he went on to reiterate the need to keep Singapore’s system of taxes and benefits fair and progressive.

To quote Mr Wong in verbatim –

*“Everyone contributes something, but those who are better off contribute more. Likewise, everyone benefits from the state’s spending, with the vulnerable benefitting more.”*

In this spirit, Mr Wong acknowledges that there is still scope (in **taxing wealth**). Broadly, property buyers will be expecting higher marginal buyer stamp duty rates for higher-value residential and non-residential properties purchases. Likewise, for higher-end and luxury cars, those who can afford them will be expected to fork out more for such purchases as they would be subject to higher Additional Registration Fee rates.

In Budget 2022, the Government indicated that it understood the concerns that Singaporeans have about the GST increase taking place at the same time as rising prices and therefore chose to stagger the 2-percentage point GST increase over 2023 and 2024.

Now, considering the outlook of prices being less favourable than one year ago, the initial thought was that there could be potential for a further one-year deferment to the second GST hike from January 2024 to January 2025. Although this was not considered for obvious fiscal reasons as stated above, considering all of the support measures that were announced during this year’s budget, this is still something to be cheerful and be grateful for – love is still very much in the air.

## TAX COMMENTARIES FOR BUSINESSES

Details of the tax changes are set out in the Annex, and a few of these are worth highlighting.

### Pillar 2

The Minister gave an update to Singapore's plan to implement the Global Anti-Base Erosion (GloBE) Rules and the Domestic Top-up Tax (formerly referred to as Minimum Effective Tax Rate), which will affect multinational enterprises (MNEs) operating in Singapore with annual group revenue of at least € 750 million.

It was confirmed that Singapore will implement a **Domestic Top-up Tax (DTT) to top up the MNE groups' effective tax rate in Singapore to 15%**, and this is intended to take effect from 2025. As such, affected MNEs operating in Singapore may expect implementation from their financial year starting on or after 1 January 2025, though the Minister assured that the timeline may be adjusted if there are delays internationally.

With many jurisdictions not having yet announced their implementation plans, and a few jurisdictions, namely the EU, the UK and Switzerland, having announced plans to implement Pillar 2 in phases from 2024, the Minister's wait-and-see approach may be considered prudent.

For now, the updates have given greater certainty in terms of Pillar 2's effect on Singapore's corporate tax regime – the DTT is expected to be introduced for affected MNEs – and the intended implementation timeline. Having said that, Pillar 2's impact on Singapore's tax revenue and competitiveness remains to be seen. On the latter, the Minister revealed that the government will review and update Singapore's broader suite of industry development schemes to ensure it remains competitive in attracting and retaining investments.

## Enterprise Innovation Scheme and Other Tax Measures

With the goal of deepening innovation across the Singapore economy, Budget 2023 included the introduction of a new **Enterprise Innovation Scheme, providing an enhanced tax deduction of 400%, on key activities in the innovation value chain, that are research and development, registration, acquisition and licensing of intellectual property rights, innovation carried out with qualifying partner institutions (i.e. Polytechnics and ITE) and qualifying training courses.**

The qualifying expenditure will be capped at S\$400,000 per qualifying activity (S\$50,000 for innovation carried out with qualifying partner institutions), with the option for businesses to convert 20% of up to S\$100,000 of total qualifying expenditure across all qualifying activities per Year of Assessment (“YA”), from YA 2024.

This has similarities with the Productivity and Innovation Credit Scheme which was allowed to sunset after YA 2018. The Enterprise Innovation Scheme thus provides enhanced tax benefits that had expired after YA 2018, such as enhanced tax deduction for qualifying training expenditure and provides enhanced tax

deduction for existing special deduction schemes and allowances in respect of intellectual property protection, R&D, as well as the licensing and acquisition of IP rights.

While we await further details on these tax measures that will be announced by June 2023, these **tax measures demonstrate the Government’s efforts to enhance innovation activities in Singapore, to prepare companies and businesses for future challenges in the global economy.** Businesses should thus leverage on these enhanced tax measures to maintain tax efficiency.

In addition to the Enterprise Innovation Scheme, businesses should also be pleased to know that Budget 2023 also extended additional tax support measures, that were introduced in previous Budgets. These include the option for **an accelerated claim of capital allowances over 2 consecutive YAs, from YA 2024 to YA 2025, for qualifying plant and machinery costs in YA 2024, and the option to claim special deduction for qualifying renovation & refurbishment costs incurred in YA 2024, in one YA.**

## PERSONAL TAX

### Personal Income Tax Change

There are adjustments made to certain personal tax reliefs and deductions that Singapore tax residents are entitled to. Firstly, **with effect from YA 2025, the Working Mother's Child Relief will change from a percentage of the mother's earned income to a fixed dollar relief.** This change aims to ensure greater support for the lower to middle-income working mothers and that all eligible worker mothers in the future would be able to claim the same amount of tax relief for a child in the same child order.

Secondly, the Government will **lapse the Foreign Domestic Worker Levy Tax Relief from the YA 2025**, considering that there is already the migrant domestic worker levy concession in place to support families who need help caring for dependants.

Thirdly, **with effect from YA 2024, working mothers are allowed to claim Grandparent Caregiver Relief on caregivers who derive total income (from trade, business, profession, vocation and/or employment) of not exceeding S\$4,000 in the year preceding the YA of claim.** This is to provide caregivers the flexibility to carry out some incidental work in addition to taking care of the young children.

Lastly, to **encourage Singaporeans in continuing the spirit of giving and donating generously, the Government will be extending the 250% tax deduction on approved donations till end of 2026.**



## GST SCHEMES

To help lower and middle income Singaporeans to tide through this higher inflationary environment and cushion the upcoming further GST rate hike, **further enhancements would be made to the permanent GST voucher (GSTV) scheme and Assurance Package (AP)** so that it continues to defray GST expenses for eligible households.

**GSTV scheme cash payouts will increase from S\$500 to S\$700 this year and to S\$850 from next year for eligible Singaporeans in homes with an annual value of S\$13,000 or below.** And those living in property with an annual value above S\$13,000 and up to S\$21,000, the cash payout will rise from S\$250 to S\$350 this year and to S\$450 from year 2024.

In relation to the AP, cash payouts will be increased to account for higher inflation. **To eligible Singaporeans who earn up to S\$34,000 a year and own up to one property, they can expect to receive the**

**highest quantum of S\$2,250 over a period of five years.** For those who earn more than S\$100,000 a year or own more than one property will receive the lowest quantum of S\$700.

Enhancing such existing schemes help to ensure that most retiree and lower-income households will not be affected by the GST rate increase. As mentioned by the Minister during his speech –

*“Under our GST system which means the GST and the GSTV combined – the more well-off consumers, as well as foreigners and tourists, will bear the higher effective GST rates than lower-income Singaporeans. This ensures that those with greater means contribute their fair share of taxes and will effectively lower the burden of taxes on lower and middle Singaporeans.”*

*Refer to Annex 1 on page 21 for list of tax changes*

## MOVING FORWARD WITH MERGERS AND ACQUISITIONS (M&A)

With Singapore moving towards a post-pandemic environment in 2023, many businesses are seen undergoing restructuring to re-evaluate opportunities to better adapt to a future embracing green investments. **Mergers and Acquisitions (M&A) provides an extensive range of gateways for businesses to grow by gaining access to new markets, achieving economies of scale and scope and diversification etc.**

To encourage businesses to scale and expand through M&A and venture into complementary businesses and emerging sectors, government agencies can play a vital role by providing various incentives and financing schemes to meet transaction funding needs.

Singapore Budget 2023 has announced that the government will provide a **S\$1 billion top-up to Singapore Global Enterprises initiative and S\$150 million for SME co-investments alongside fund managers.**

Scale-up SG, launched in 2019, is Enterprise Singapore's flagship growth programme to accelerate the growth of high potential enterprises and help them become global champions.

*Refer to Annex 2 on page 34 for key information on M&A.*

Under the Scale-up SG programme, the 65 participating companies have successfully launched over 50 new products, expanded into 32 new markets, made more than 30 merger and acquisition deals, and embarked on more than 20 innovative collaborations with fellow participants.

For companies exploring the M&A route, the **Enterprise Financing Scheme – Merger & Acquisition (EFS – M&A)** which was enhanced for 4 years, from 1 April 2022 to 31 March 2026, will serve to empower businesses to venture into both international and domestic markets to **scale up business, innovate and diversify into new economies of growth.**

With the additional government fundings and various capability building programmes, Singapore is bound to see an increase in its local enterprises looking for more opportunities to grow both domestically and internationally through M&A. Consequently, commercial due diligence and financial due diligence services will become an essential that many businesses will require if the businesses are hoping onto the bandwagon to take advantage of newly announced fundings as well as the existing EFS – M&A within the qualifying period.

## ANNEX 1 – LIST OF TAX CHANGES

### (A) Tax Changes for Businesses

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
<b>Maintaining the Competitiveness and Resilience of the Tax System</b>			
1.	Implement the Global Anti-Base Erosion (GloBE) Rules (i.e., Income Inclusion Rule and Undertaxed Profits Rule) and Domestic Top-up Tax (DTT) <sup>1</sup>	In Budget 2022, Minister for Finance announced that in response to the global minimum effective tax rate under the Pillar 2 GloBE rules of the Base Erosion and Profit Shifting (BEPS) 2.0 project, and based on consultation with industry stakeholders, MOF would study the introduction of a top-up tax. If introduced, this would top up the effective tax rate of multinational enterprises operating in Singapore with annual group revenue of at least €750 million, as reflected in the consolidated financial statements of the ultimate parent entity, to 15%.	<p>Singapore plans to implement the GloBE rules and DTT from businesses' financial year starting on or after 1 January 2025. We will continue to monitor the international developments and adjust our implementation timeline as needed if there are delays internationally.</p> <p>We will also continue to engage businesses and provide them with sufficient notice ahead of any rules becoming effective.</p>
2.	Introduce the Enterprise Innovation Scheme (EIS)	<p>Currently, the following tax measures are available to encourage research and development (R&amp;D), intellectual property (IP) registration, IP rights acquisition and IP rights licensing:</p> <p>a) 250% tax deduction for staff costs and consumables incurred on qualifying R&amp;D projects conducted in Singapore under sections 14C and 14D of the Income Tax Act 1947 (ITA). Current sunset date is Year of Assessment (YA) 2025.</p> <p>b) 200% tax deduction for the first \$100,000 (and 100% for amounts exceeding \$100,000) of qualifying IP registration costs under section 14A of the ITA. Current sunset date is YA2025.</p> <p>c) 100% writing-down allowance (WDA) over a period of five, 10 or 15 years on acquisition cost of qualifying IP rights under section 19B of the ITA. Current sunset date is YA2025.</p> <p>d) 200% tax deduction for the first \$100,000 (and 100% for amounts exceeding \$100,000) of qualifying IP rights licensing expenditure under sections 14 or 14C, and 14U of the ITA. Current sunset date for</p>	<p>To encourage businesses to engage in R&amp;D, innovation and capability development activities, the following suite of tax measures will be enhanced or introduced under the EIS:</p> <p>a) Enhance the tax deduction to 400% for the first \$400,000 of staff costs and consumables incurred on qualifying R&amp;D projects conducted in Singapore for each YA from YA2024 to YA2028.</p> <p>b) Enhance the tax deduction to 400% for the first \$400,000 of qualifying IP registration costs incurred per YA from YA2024 to YA2028.</p> <p>c) Enhance the tax allowance/deduction to 400% for the first \$400,000 (combined cap) of qualifying expenditure incurred on the acquisition and licensing of IP rights per YA from YA2024 to YA2028. This enhancement will only be available to businesses that generate less than \$500 million in revenue in the relevant YA.</p> <p>d) Enhance the tax deduction to 400% for the first \$400,000 of</p>

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
		<p>section 14U is YA2025.</p> <p>In addition, 100% tax deduction can be claimed for training expenditure incurred, subject to the general tax deduction rules under sections 14 and 15 of the ITA.</p>	<p>qualifying training expenditure incurred on qualifying courses (i.e. courses that are eligible for SkillsFuture Singapore funding and aligned with the Skills Framework) per YA from YA2024 to YA2028.</p> <p>e) Introduce a 400% tax deduction for up to \$50,000 of qualifying innovation expenditure incurred on qualifying innovation projects carried out with polytechnics, the Institute of Technical Education, and other qualified partners per YA from YA2024 to YA2028.</p> <p>f) Allow businesses to, in lieu of tax deductions/allowances, opt for a non-taxable cash payout at a cash conversion ratio of 20% on up to \$100,000 of total qualifying expenditure across all qualifying activities in (a) to (e) above per YA. The cash payout option will be capped at \$20,000 per YA, and will only be available to businesses which have at least three full-time local employees<sup>2</sup> (Singapore Citizens or Permanent Residents with CPF contributions) earning a gross monthly salary of at least \$1,400 in employment for six months or more in the basis period of the relevant YA.</p> <p>g) The sunset dates for section 14A (Deduction for costs of protecting IP), section 14C (Deduction for qualifying expenditure on R&amp;D), section 14D (Enhanced deduction for qualifying expenditure on R&amp;D), section 14U (Enhanced deduction for expenditure on licensing IP rights) and section 19B (WDA for capital expenditure on acquiring IP rights) of the ITA will be extended till YA2028, in line with the above enhancements.</p>

<sup>1</sup> Formerly referred to as Minimum Effective Tax Rate (METR).

<sup>2</sup> For the purposes of the cash payout, “employees” may include individuals who are deployed to the business under a centralised hiring arrangement or secondment arrangement.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
			<p>All other conditions under sections 14A, 14C, 14D, 14U and 19B of the ITA remain the same.</p> <p>For more information on this scheme, please refer to Annex D-1 IRAS will also provide further details of the changes by 30 June 2023.</p>
3.	Enhance the Double Tax Deduction for Internationalisation (DTD <sub>i</sub> ) Scheme	<p>Under the DTD<sub>i</sub> scheme, businesses are allowed a tax deduction of 200% on qualifying market expansion and investment development expenses<sup>3</sup>, subject to prior approval<sup>4</sup> from Enterprise Singapore (EnterpriseSG) or Singapore Tourism Board (STB).</p> <p>The DTD<sub>i</sub> scheme is in place until 31 December 2025.</p>	<p>E-commerce is an increasingly important and relevant mode of overseas expansion for businesses. To support businesses in their efforts to overcome initial challenges and build up capabilities in internationalising via e-commerce, the scope of the DTD<sub>i</sub> scheme will be enhanced to include a new qualifying activity “e-commerce campaign”<sup>5</sup> and cover the following e-commerce campaign startup expenses paid to e-commerce platform/service providers:</p> <p>a) <u>Business advisory</u>: Advisory on market promotion and execution plans (e.g. choice of suitable e-commerce platforms);</p> <p>b) <u>Account creation</u>: Assistance with setting up accounts on e-commerce platforms, and the right to sell on e-commerce platforms;</p> <p>c) <u>Content creation</u>: Design of e-commerce campaign publicity materials (e.g. e-store banners, online product images); and</p> <p>d) <u>Product listing and placement</u>: Uploading content on products/services to e-commerce platforms, and selection of suitable frequency and timing to display content on products/services.</p> <p>Prior approval is required from EnterpriseSG to enjoy DTD<sub>i</sub> on the new qualifying activity. For each business, EnterpriseSG will only approve DTD<sub>i</sub> support for e-commerce campaigns for a maximum period of one year</p>



S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
			<p>applied on a per- country basis.</p> <p>The above enhancement will take effect for qualifying e-commerce campaign startup expenses incurred on or after 15 February 2023. EnterpriseSG will provide further details of the changes by 28 February 2023.</p>
4.	Provide an Option to Accelerate the Write-off of the Cost of Acquiring Plant and Machinery (P&M)	Businesses that incur capital expenditure on the acquisition of P&M may claim capital allowance (CA) under section 19 (i.e. write-off over the working life of the assets as specified in the Sixth Schedule) or section 19A (i.e. write-off over one or three years) of the ITA.	<p>To provide temporary broad-based support to businesses during this period of restructuring, businesses that incur capital expenditure on the acquisition of P&amp;M in the basis period for YA2024 (i.e. financial year ending in 2023) will have an option to accelerate the write-off of the cost of acquiring such P&amp;M over two years. This option, if exercised, is irrevocable.</p> <p>The rates of accelerated CA allowed are as follows:</p> <ol style="list-style-type: none"> <li>75% of the cost incurred to be written off in the first year (i.e. YA2024); and</li> <li>25% of the cost incurred to be written-off in the second year (i.e. YA2025).</li> </ol> <p>The above option will be in addition to the options currently available under sections 19 and 19A of the ITA.</p> <p>No deferment of CA claims is allowed under the above option. This means that if a business opts for the accelerated write-off option, it needs to claim the capital expenditure incurred for acquiring P&amp;M based on the rates of 75% (in YA2024) and 25% (in YA2025) over the two consecutive YAs.</p>

<sup>3</sup> For the full list activities and expenses that qualify for DTDi, please refer to EnterpriseSG’s website:

<https://www.enterprisesg.gov.sg/financial-assistance/tax-incentives/tax-incentives/double-tax-deduction-for-internationalisation>

<sup>4</sup> No prior approval is required from EnterpriseSG or STB for tax deduction on the first \$150,000 of qualifying expenses incurred on selected eligible activities for each YA.

<sup>5</sup> “E-commerce” refers to the business of buying and selling goods and services on the Internet, while in the context of DTDi “campaign” refers to an organised course of action to promote goods and services abroad.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
5.	Provide an Option to Accelerate the Deduction for Renovation or Refurbishment (R&R) Expenditure	Under section 14N of the ITA, businesses that incur qualifying expenditure on R&R may claim tax deduction on such expenditure over three consecutive YAs on a straight-line basis, starting from the YA relating to the basis period in which the R&R expenditure is incurred. A cap of \$300,000 for every relevant period of the three consecutive YAs applies.	<p>To provide temporary broad-based support to businesses during this period of restructuring, businesses that incur qualifying expenditure on R&amp;R during the basis period for YA2024 (i.e. financial year ending in 2023) will have an option to claim R&amp;R deduction in one YA (i.e. accelerated R&amp;R deduction). The cap of \$300,000 for every relevant period of three consecutive YAs will still apply. This option, if exercised, is irrevocable.</p> <p>This option will be in addition to the existing option currently available under section 14N of the ITA.</p>
6.	Extend the Investment Allowance (IA) Scheme	<p>The IA scheme provides an additional tax allowance for businesses which incur qualifying fixed capital expenditure on approved projects. This is calculated as a percentage of the amount of capital expenditure incurred, net of grants, on an approved project.</p> <p>The IA scheme, which is administered by the Singapore Economic Development Board, Building and Construction Authority, and EnterpriseSG, is scheduled to lapse after 31 December 2023.</p>	To continue encouraging businesses to make capital investments in plant and productive equipment in Singapore, the IA scheme will be extended till 31 December 2028.
7.	Extend the IA-100% Scheme for Automation Projects	<p>Businesses can enjoy 100% IA support on the amount of approved capital expenditure, net of grants, for automation projects approved by EnterpriseSG.</p> <p>The IA-100% scheme is scheduled to lapse after 31 March 2023.</p>	To continue to encourage businesses to transform through automation, the IA-100% scheme will be extended till 31 March 2026, with the same parameters.
8.	Extend the Pioneer Certificate Incentive (PC) and Development and Expansion Incentive (DEI)	<p>Both the PC and DEI aim to encourage companies to grow capabilities, conduct new or expanded economic activities, and establish their global or regional headquarters in Singapore.</p> <p>a) Under the PC, recipients are eligible for corporate tax exemption on income from qualifying activities.</p> <p>b) Under the DEI, recipients are eligible for concessionary tax rates of 5% or 10% on qualifying income.</p>	To continue encouraging companies to anchor and grow strategic high value-added manufacturing and services activities in Singapore, the PC and DEI will be extended till 31 December 2028.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
		The PC and DEI are scheduled to lapse after 31 December 2023.	
9.	Extend the IP Development Incentive (IDI)	<p>The IDI aims to support companies that use and commercialise IP rights arising from R&amp;D in Singapore.</p> <p>Under IDI, recipients are eligible for concessionary tax rates of 5% or 10% on a percentage of qualifying IP income.</p> <p>The IDI is scheduled to lapse after 31 December 2023.</p>	To continue supporting the use and commercialisation of IP rights arising from R&D activities in Singapore, the IDI will be extended till 31 December 2028.
10.	Extend and Refine the Qualifying Debt Securities (QDS) Scheme	<p>The QDS scheme offers the following tax concessions on qualifying income from QDS:</p> <p>a) 10% concessionary tax rate for qualifying companies and bodies of persons in Singapore; and</p> <p>b) Tax exemption for qualifying non-residents and qualifying individuals.</p> <p>To qualify as QDS, debt securities must be substantially arranged in Singapore as follows:</p> <p>a) All debt securities must be substantially arranged by a financial sector incentive (capital market) company or a financial sector incentive (standard tier) company (collectively referred to as “FSI company”); and</p> <p>b) For insurance-linked securities (ILS)<sup>6</sup> that are unable to meet the condition in (a) above, at least 20% of the ILS issuance costs incurred by the issuer is paid to Singapore businesses.</p> <p>The QDS scheme is scheduled to lapse after 31 December 2023.</p>	<p>To continue supporting the development of Singapore’s debt market, the QDS scheme will be extended till 31 December 2028.</p> <p>The scope of qualifying income under the QDS scheme will be streamlined and clarified such that it includes all payments in relation to early redemption of a QDS.</p> <p>To ensure continued relevance, the requirement that the QDS has to be substantially arranged in Singapore will be rationalised, as follows:</p> <p>a) For all debt securities that are issued on or after 15 February 2023, they must be substantially arranged in Singapore by a financial institution holding a specified licence (instead of a FSI company).</p> <p>b) For ILS that are issued on or after 1 January 2024, if they are unable to meet the condition in (a) above, at least 30% of the ILS issuance costs incurred by the issuer must be paid to Singapore businesses.</p> <p>All other conditions of the scheme remain the same.</p> <p>The Monetary Authority of Singapore (MAS) will provide further details by 31 May 2023.</p>

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
11.	Extend the Tax Exemption on Income Derived by Primary Dealers from Trading in Singapore Government Securities (SGS)	<p>Tax exemption is granted on income derived by primary dealers<sup>7</sup> from trading in SGS.</p> <p>The tax exemption is scheduled to lapse after 31 December 2023.</p>	<p>To continue supporting primary dealers and encourage trading in SGS, the tax exemption on income derived by primary dealers from trading in SGS will be extended till 31 December 2028.</p> <p>All other conditions of the scheme remain the same.</p>
12.	Extend and Refine the Tax Incentive Scheme for Approved Special Purpose Vehicle (ASPV) Engaged in Asset Securitisation Transactions (ASPV scheme) and Introduce a New Sub-scheme to Support Covered Bonds	<p>The ASPV scheme grants the following tax concessions to an ASPV engaged in asset securitisation transactions:</p> <ul style="list-style-type: none"> <li>a) Tax exemption on income derived by an ASPV from asset securitisation transactions;</li> <li>b) Goods and Services Tax (GST) recovery on its qualifying business expenses at a fixed rate of 76%; and</li> <li>c) Withholding tax (WHT) exemption on payments to qualifying non-residents on over-the-counter financial derivatives in connection with an asset securitisation transaction.</li> </ul> <p>The ASPV scheme is scheduled to lapse after 31 December 2023.</p>	<p>To continue developing the structured debt market, the ASPV scheme will be extended till 31 December 2028.</p> <p>Instead of a fixed rate of 76%, the GST recovery rate will be the prevailing GST recovery rate/methodology accorded to licensed full banks under MAS for the specific year in question.</p> <p>All other tax concessions and conditions of the ASPV scheme remain the same.</p> <p>Further, to support the issuance of covered bonds in Singapore, a new sub-scheme named ASPV (Covered Bonds) will be introduced for the special purpose vehicle holding the “cover pool” in relation to the covered bonds as defined in MAS Notice 648.</p> <p>The ASPV (Covered Bonds) scheme will take effect from 15 February 2023 to 31 December 2028 and will be administered by MAS.</p> <p>MAS will provide further details by 31 May 2023.</p>

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
13.	Extend and Refine the Financial Sector Incentive (FSI) Scheme	<p>The FSI scheme accords concessionary tax rates of 5%, 10%, 12% and 13.5% on income from qualifying banking and financial activities, headquarters and corporate services, fund managing and investment advisory services.</p> <p>The FSI scheme is scheduled to lapse after 31 December 2023.</p>	<p>To continue supporting the growth of financial sector activities in Singapore, the FSI scheme will be extended and refined as follows:</p> <p>a) The FSI scheme<sup>8</sup> will be extended till 31 December 2028.</p> <p>b) The existing concessionary tax rates will be streamlined to two tiers of 10% and 13.5% for new and renewal awards approved on or after 1 January 2024, as follows:</p> <ul style="list-style-type: none"> <li>i. FSI-Capital Market, FSI-Derivatives Market and FSI-Credit Facilities Syndication – from 5% to 10%;</li> <li>ii. FSI-Fund Management and FSI-Headquarter Services – remain at 10%;</li> <li>iii. FSI-Trustee Companies – from 12% to 13.5%; and</li> <li>iv. FSI-Standard Tier – remain at 13.5%.</li> </ul> <p>c) The qualifying activities will be updated to ensure continued relevance.</p> <p>MAS will provide further details of the changes by 31 May 2023.</p>
14.	Extend the Insurance Business Development – Insurance Broking Business (IBD-IBB) Scheme	<p>The IBD-IBB scheme grants approved insurance and reinsurance brokers a concessionary tax rate of 10% on commission and fee income derived from insurance broking and advisory services.</p> <p>The IBD-IBB scheme is scheduled to lapse after 31 December 2023.</p>	<p>To further strengthen Singapore's position as a leading insurance and reinsurance centre, the IBD-IBB scheme will be extended till 31 December 2028.</p> <p>All other conditions of the scheme remain the same.</p>

<sup>8</sup> Under the FSI-Headquarter Services, WHT exemption is granted on interest payments made to qualifying non-residents during the award tenure on qualifying loans. The WHT exemption will similarly be extended till 31 December 2028.



S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
15.	Extend the Tax Concession for Deduction of General Provisions for Doubtful Debts and Regulatory Loss Allowances Made in Respect of Non-credit-impaired Financial Instruments for Banks (Including Merchant Banks) and Qualifying Finance Companies	<p>Under section 14G of the ITA, banks, merchant banks and qualifying finance companies can claim a tax deduction for general provisions on non-credit-impaired loans and debt securities made under the Financial Reporting Standard 109 or Singapore Financial Reporting Standard (International) 9, and any additional loss allowances as required under prevailing MAS Notices, subject to a cap.</p> <p>The tax deduction under section 14G is scheduled to lapse after YA2024 (for banks, merchant banks and qualifying finance companies with a 31-December financial year end (FYE)) or YA2025 (for banks, merchant banks and qualifying finance companies with a non-31-December FYE).</p>	To continue to promote the overall robustness and stability of the Singapore financial system, the tax deduction under section 14G of the ITA will be extended till YA2029 (for banks, merchant banks, and qualifying finance companies with a 31-December FYE) or YA2030 (for banks, merchant banks, and qualifying finance companies with a non-31-December FYE).
16.	Extend Three Tax Measures Relating to Submarine Cable Systems	<p>Currently, there are three tax measures relating to submarine cable systems:</p> <ol style="list-style-type: none"> <li>WHT exemption on payments made to non-residents for use of international telecommunications submarine cable capacity under indefeasible right to use (IRU) agreements. This is scheduled to lapse after 31 December 2023.</li> <li>WDA for the acquisition of an IRU over their useful life. This is scheduled to lapse after 31 December 2025.</li> <li>IA for the construction and operation of submarine cable systems in Singapore. This is scheduled to lapse after 31 December 2023.</li> </ol>	To maintain and enhance Singapore's international connectivity, all three tax measures will be extended till 31 December 2028, with the same parameters.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
17.	Withdraw the Tax Deduction for Expenditure Incurred on Building Modifications for Benefit of Disabled Employees	Under section 14F of the ITA, employers can claim tax deductions for approved expenditure incurred on any addition or alteration to business premises for the purpose of facilitating the mobility or work of any disabled employee, subject to a one-off cap of \$100,000.	The scheme will be withdrawn from 15 February 2023. Introduced in Budget 1989, the scheme has become less relevant over the years. Since then, other support schemes (e.g. the Open Door Programme Job Redesign Grant) have been introduced to help employers recruit and retain disabled employees, or to support employers for accommodations beyond (and including) physical modifications of the workplace. Section 14N on tax deductions for Renovation and Refurbishment, introduced in Budget 2008, can also be tapped upon for workplace modifications without the need for prior approval from government agencies.

## ANNEX 1 – LIST OF TAX CHANGES

### (B) Other Tax Changes

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment																
<b>Building a Fairer and More Resilient Tax System</b>																			
1.	Change in Working Mother's Child Relief (WMCR) from a Percentage of an Eligible Working Mother's Earned Income to a Fixed Dollar Tax Relief for Those with a Qualifying Child who is a Singapore Citizen Born or Adopted on or after 1 January 2024	<p>The WMCR amount for eligible working mothers with a qualifying child who is a Singapore citizen is as follows, subject to a total cap of \$50,000 per child (i.e. WMCR plus Qualifying Child Relief/ Handicapped Child Relief):</p> <table border="1"> <thead> <tr> <th>Child Order</th> <th>WMCR Amount For a qualifying Singapore citizen child born or adopted before 1 January 2024</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>15% of mother's earned income</td> </tr> <tr> <td>2nd</td> <td>20% of mother's earned income</td> </tr> <tr> <td>3rd and beyond</td> <td>25% of mother's earned income</td> </tr> </tbody> </table> <p>The total WMCR amount that an eligible working mother can claim for all her qualifying children is capped at 100%<sup>9</sup> of the mother's earned income for the YA.</p>	Child Order	WMCR Amount For a qualifying Singapore citizen child born or adopted before 1 January 2024	1st	15% of mother's earned income	2nd	20% of mother's earned income	3rd and beyond	25% of mother's earned income	<p>For an eligible working mother with a qualifying Singapore citizen child born or adopted before 1 January 2024, there is no change to the WMCR that the mother can claim. Working mothers of these children can continue to claim the WMCR in respect of these children based on the existing design and quantum, i.e. a percentage of their earned income.</p> <p>As part of the review of the Government's support for Marriage &amp; Parenthood, the WMCR will be changed to a fixed dollar tax relief for eligible working mothers in respect of qualifying children who are Singapore citizens born or adopted on or after 1 January 2024<sup>10</sup>.</p> <p>The WMCR amount for eligible working mothers in respect of a qualifying child who is a Singapore citizen born or adopted on or after 1 January 2024 is as follows:</p> <table border="1"> <thead> <tr> <th>Child Order</th> <th>WMCR Amount For a qualifying Singapore citizen child born or adopted on or after 1 January 2024</th> </tr> </thead> <tbody> <tr> <td>1st</td> <td>\$8,000</td> </tr> <tr> <td>2nd</td> <td>\$10,000</td> </tr> <tr> <td>3rd and beyond</td> <td>\$12,000</td> </tr> </tbody> </table>	Child Order	WMCR Amount For a qualifying Singapore citizen child born or adopted on or after 1 January 2024	1st	\$8,000	2nd	\$10,000	3rd and beyond	\$12,000
Child Order	WMCR Amount For a qualifying Singapore citizen child born or adopted before 1 January 2024																		
1st	15% of mother's earned income																		
2nd	20% of mother's earned income																		
3rd and beyond	25% of mother's earned income																		
Child Order	WMCR Amount For a qualifying Singapore citizen child born or adopted on or after 1 January 2024																		
1st	\$8,000																		
2nd	\$10,000																		
3rd and beyond	\$12,000																		

<sup>9</sup> If the amount of taxable earned income is lower than the maximum amount claimable, the relief will be capped at the amount of taxable earned income.

<sup>10</sup> For a child born to a mother before she is married to her spouse/ex-spouse, the date of marriage would be used to determine the type of WMCR the mother is eligible for. For a child who is not a Singapore citizen at birth, it would be the date of approval of Singapore citizenship.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
			<p>WMCR will continue to be part of a suite of support measures for eligible working mothers, including lower- to middle- income working mothers of qualifying Singapore citizen children.</p> <p>This change will take effect from the YA2025.</p> <p>Illustration of the change can be found in Factsheet 1. Further details can also be found at <a href="http://www.go.gov.sg/wmcr">www.go.gov.sg/wmcr</a>.</p> <p>For more information on support for Marriage &amp; Parenthood, please refer to Annex E-2.</p>
2.	Lapse the Foreign Domestic Worker Levy Relief (FDWLR) from YA2025	<p>Currently, a woman resident in Singapore who, in the year immediately preceding the YA of claim, was —</p> <ul style="list-style-type: none"> <li>a) living with her husband; or</li> <li>b) married and her husband is not resident in Singapore; or</li> <li>c) married but separated from her husband, a divorcee or a widow and who, in the year immediately preceding the YA, has any unmarried child or children living with her in the same household in Singapore in respect of whom she may be allowed a deduction under the Qualifying Child Relief,</li> </ul> <p>is allowed to claim FDWLR in respect of one migrant domestic worker employed by her or her husband.</p> <p>The amount of FDWLR is twice the total migrant domestic worker levy paid in the year immediately preceding the YA of claim on one migrant domestic worker.</p>	<p>The FDWLR was introduced in 1989 to support working married women who needed the help of a migrant domestic worker.</p> <p>Since then, the Government has introduced a number of schemes that directly support those caring for dependants, including working mothers. In particular, those living with children below 16 years old, elderly or persons with disabilities who require the help of a migrant domestic worker enjoy a concessionary levy of \$60 per month, instead of the usual levy of \$300 or \$450 per month for the first and subsequent helper respectively. This concessionary levy directly benefits all families who need help with caring for their dependents, including those who do not pay income tax.</p> <p>The FDWLR will be lapsed for all taxpayers with effect from the YA2025.</p>

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment																																								
3.	Raise Buyer's Stamp Duty (BSD) Rates for Higher-value Residential and Non-residential Properties	<p>Currently, transactions in residential and non-residential properties are subject to marginal BSD rates of 1% to 4% and 1% to 3% respectively:</p> <table border="1"> <thead> <tr> <th rowspan="2">Higher of Purchase Price or Market Value of the Property</th> <th colspan="2">Marginal BSD Rate</th> </tr> <tr> <th>Residential Property</th> <th>Non-residential Property</th> </tr> </thead> <tbody> <tr> <td>First \$180,000</td> <td>1%</td> <td>1%</td> </tr> <tr> <td>Next \$180,000</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Next \$640,000</td> <td>3%</td> <td>3%</td> </tr> <tr> <td>Amount exceeding \$1,000,000</td> <td>4%</td> <td></td> </tr> </tbody> </table>	Higher of Purchase Price or Market Value of the Property	Marginal BSD Rate		Residential Property	Non-residential Property	First \$180,000	1%	1%	Next \$180,000	2%	2%	Next \$640,000	3%	3%	Amount exceeding \$1,000,000	4%		<p>To enhance the progressivity of our BSD regime, higher marginal BSD rates will be introduced for higher-value residential and non-residential properties.</p> <p>For <b>residential properties</b>, a new marginal BSD rate of:</p> <p>a) 5% will apply to the portion of the property value in excess of \$1.5 million and up to \$3 million; and</p> <p>b) 6% will apply to the portion of the property value in excess of \$3 million.</p> <p>For <b>non-residential properties</b>, a new marginal BSD rate of:</p> <p>a) 4% will apply to the portion of the property value in excess of \$1 million and up to \$1.5 million; and</p> <p>b) 5% will apply to the portion of the property value in excess of \$1.5 million.</p> <p>The revised rates will apply to all properties acquired on or after 15 February 2023:<sup>11</sup></p> <table border="1"> <thead> <tr> <th rowspan="2">Higher of Purchase Price or Market Value of the Property</th> <th colspan="2">Marginal BSD Rate</th> </tr> <tr> <th>Residential Property</th> <th>Non-residential Property</th> </tr> </thead> <tbody> <tr> <td>First \$180,000</td> <td>1%</td> <td>1%</td> </tr> <tr> <td>Next \$180,000</td> <td>2%</td> <td>2%</td> </tr> <tr> <td>Next \$640,000</td> <td>3%</td> <td>3%</td> </tr> <tr> <td>Next \$500,000</td> <td>4%</td> <td>4% (New)</td> </tr> <tr> <td>Next \$1,500,000</td> <td>5% (New)</td> <td>5% (New)</td> </tr> <tr> <td>Amount exceeding \$1,000,000</td> <td>6% (New)</td> <td></td> </tr> </tbody> </table>	Higher of Purchase Price or Market Value of the Property	Marginal BSD Rate		Residential Property	Non-residential Property	First \$180,000	1%	1%	Next \$180,000	2%	2%	Next \$640,000	3%	3%	Next \$500,000	4%	4% (New)	Next \$1,500,000	5% (New)	5% (New)	Amount exceeding \$1,000,000	6% (New)	
Higher of Purchase Price or Market Value of the Property	Marginal BSD Rate																																										
	Residential Property	Non-residential Property																																									
First \$180,000	1%	1%																																									
Next \$180,000	2%	2%																																									
Next \$640,000	3%	3%																																									
Amount exceeding \$1,000,000	4%																																										
Higher of Purchase Price or Market Value of the Property	Marginal BSD Rate																																										
	Residential Property	Non-residential Property																																									
First \$180,000	1%	1%																																									
Next \$180,000	2%	2%																																									
Next \$640,000	3%	3%																																									
Next \$500,000	4%	4% (New)																																									
Next \$1,500,000	5% (New)	5% (New)																																									
Amount exceeding \$1,000,000	6% (New)																																										

<sup>11</sup> The Additional Conveyance Duties for Buyers (ACDB) rates, which apply to qualifying acquisitions of equity interest in property holding entities (PHEs), will also be adjusted accordingly, from up to 44% to up to 46%. The revised ACDB rate comprises:

- a. Revised BSD at 1% to 6%; and
- b. Additional Buyer's Stamp Duty (ABSD) at 40% (flat rate).

A PHE is an entity that has at least 50% (i.e., asset ratio) of its total tangible assets comprising prescribed immovable properties in Singapore. Please refer to IRAS' website for more details on PHEs and prescribed immovable properties. More details can be found at [https://www.iras.gov.sg/taxes/stamp-duty/for-property-holding-entities-\(%27phe%27\)/basics-of-stamp-duty-for-property-holding-entities/determining-the-additional-conveyance-duties-payable](https://www.iras.gov.sg/taxes/stamp-duty/for-property-holding-entities-(%27phe%27)/basics-of-stamp-duty-for-property-holding-entities/determining-the-additional-conveyance-duties-payable).



S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
			<p>There will be a transitional provision, where the BSD rates on or before 14 February 2023 will apply for cases that meet <u>all</u> the conditions below:</p> <ul style="list-style-type: none"> <li>a) The Option to Purchase (OTP) was granted by sellers to potential buyers on or before 14 February 2023;</li> <li>b) This OTP is exercised on or before 7 March 2023, or within the OTP validity period, whichever is earlier; <u>and</u></li> <li>c) This OTP has not been varied on or after 15 February 2023.</li> </ul> <p>Further details can be found at <a href="https://www.iras.gov.sg/taxes/stamp-duty/for-property/buying-or-acquiring-property/buyer%27s-stamp-duty-(bsd)">https://www.iras.gov.sg/taxes/stamp-duty/for-property/buying-or-acquiring-property/buyer%27s-stamp-duty-(bsd)</a>.</p>
4.	<p>Allow Resident Individual Taxpayers to Claim Grandparent Caregiver Relief (GCR) in Respect of Caregivers who have Trade, Business, Profession, Vocation or/and Employment Income not Exceeding \$4,000 in the Year Preceding the YA of Claim</p>	<p>Working mothers who engage the help of their parents, grandparents, parents-in-law or grandparents-in-law (including parents or grandparents of an ex-spouse) to take care of their young children may claim the GCR, subject to conditions.</p> <p>One of the conditions is that the caregiver was not carrying on any trade, business, profession, vocation or/and employment in the year preceding the YA of claim.</p>	<p>To give caregivers the flexibility to do some incidental work, working mothers will be able to claim GCR in respect of caregivers who have trade, business, profession, vocation or/and employment income, as long as the caregivers' total income from these activities does not exceed \$4,000 in the year preceding the YA of claim, if they have met all other conditions.</p> <p>This change will take effect from the YA2024.</p>

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
<b>Fostering a Culture of Giving</b>			
1.	Extend the 250% Tax Deduction for Qualifying Donations to IPCs and Eligible Institutions	Donors are eligible for a 250% tax deduction for qualifying donations made to Institutions of a Public Character (IPCs) and other eligible institutions from 1 January 2016 to 31 December 2023.	<p>To continue encouraging Singaporeans to give back to the community, we will extend the 250% tax deduction to qualifying donations made from 1 January 2024 to 31 December 2026.</p> <p>All other conditions of the scheme remain the same.</p> <p>For more information on the extension of the 250% tax deductions for qualifying donations to IPCs and eligible institutions, please refer to Annex F-1.</p>
2.	Extend and Enhance the Corporate Volunteer Scheme <sup>12</sup> (CVS)	<p>A qualifying person can, subject to conditions, enjoy a total of 250% tax deduction on qualifying expenditure such as wages incurred by the person from 1 July 2016 to 31 December 2023 in respect of –</p> <p>a) The provision of services by the person’s qualifying employee to an IPC during that period; or</p> <p>b) The secondment of the person’s qualifying employee to an IPC during that period.</p> <p>There is a cap on qualifying expenditure of \$250,000 per business per YA and \$50,000 per IPC per calendar year.</p>	<p>a) To continue supporting corporate volunteering, we will extend 250% tax deduction on qualifying expenditure incurred under the CVS until 31 December 2026.</p> <p>b) The scope of qualifying volunteering activities will be expanded to include activities which are conducted virtually (e.g. online mentoring and tuition support for youths/children) or outside of the IPCs’ premises (e.g. refurbishment of rental flats).</p> <p>c) The cap on qualifying expenditure per IPC per calendar year has been doubled to \$100,000.</p> <p>The above enhancements will take effect from 1 January 2024.</p> <p>All other conditions of the scheme remain the same.</p> <p>For more information on the extension and enhancement of the CVS, please refer to Annex F-1.</p>

<sup>12</sup> With effect from 1 April 2023, the scheme will be renamed from the Business and IPC Partnership Scheme (BIPS) to CVS.

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment
3.	Philanthropy Tax Incentive Scheme for Family Offices	n.a.	<p>A tax incentive scheme will be introduced for qualifying donors with Family Offices operating in Singapore. To qualify, donors must have a fund under MAS' section 13O or 13U schemes and meet eligibility conditions, such as incremental business spending of \$200,000.</p> <p>Under the scheme, qualifying donors can claim 100% tax deduction for overseas donations made through qualifying local intermediaries. The tax deduction is capped at 40% of the donor's statutory income.</p> <p>MAS will provide further details by 30 Jun 2023.</p>

**(C) Tax Changes for Vehicles**

S/N	Name of Tax Change	Existing Tax Treatment	New Tax Treatment																						
<b>Building a Fairer and More Resilient Tax System</b>																									
1.	Additional Registration Fee (ARF) Changes	<p>The ARF is currently tiered based on the following rates:</p> <table border="1"> <thead> <tr> <th>Open Market Value (OMV)</th> <th>ARF Rate</th> </tr> </thead> <tbody> <tr> <td>First \$20,000</td> <td>100% of OMV</td> </tr> <tr> <td>Next \$30,000</td> <td>140% of OMV</td> </tr> <tr> <td>Next \$30,000</td> <td>180% of OMV</td> </tr> <tr> <td>In excess of \$80,000</td> <td>220% of OMV</td> </tr> </tbody> </table>	Open Market Value (OMV)	ARF Rate	First \$20,000	100% of OMV	Next \$30,000	140% of OMV	Next \$30,000	180% of OMV	In excess of \$80,000	220% of OMV	<p>To make our vehicle tax structure more progressive, the ARF payable for cars, taxis, and goods-cum-passenger vehicles will be tiered based on the following rates:</p> <table border="1"> <thead> <tr> <th>OMV</th> <th>ARF Rate</th> </tr> </thead> <tbody> <tr> <td>First \$20,000</td> <td>100% of OMV</td> </tr> <tr> <td>Next \$20,000</td> <td>140% of OMV</td> </tr> <tr> <td>Next \$20,000</td> <td>190% of OMV</td> </tr> <tr> <td>Next \$20,000</td> <td>250% of OMV</td> </tr> <tr> <td>In excess of \$80,000</td> <td>320% of OMV</td> </tr> </tbody> </table> <p>The new ARF structure will apply to all new and imported used cars and goods-cum-passenger vehicles registered with Certificates of Entitlement (COEs) obtained from the second COE bidding exercise in February 2023 onwards.</p> <p>For vehicles that do not need to bid for COEs (e.g. taxis, classic cars), the new rates will apply for those registered on or after 15 February 2023.</p> <p>Further details will be announced by the LTA. Worked examples can be found in Annex G-2.</p>	OMV	ARF Rate	First \$20,000	100% of OMV	Next \$20,000	140% of OMV	Next \$20,000	190% of OMV	Next \$20,000	250% of OMV	In excess of \$80,000	320% of OMV
Open Market Value (OMV)	ARF Rate																								
First \$20,000	100% of OMV																								
Next \$30,000	140% of OMV																								
Next \$30,000	180% of OMV																								
In excess of \$80,000	220% of OMV																								
OMV	ARF Rate																								
First \$20,000	100% of OMV																								
Next \$20,000	140% of OMV																								
Next \$20,000	190% of OMV																								
Next \$20,000	250% of OMV																								
In excess of \$80,000	320% of OMV																								
2.	Preferential Additional Registration Fee (PARF) Changes	<p>PARF rebates are provided to car and taxi owners as an incentive to deregister their vehicles early. It is calculated as a percentage of ARF paid and tiered based on the age of vehicle at deregistration.</p>	<p>To make our vehicular tax system more progressive, PARF rebates will be capped at \$60,000.</p> <p>For cars that need to bid for COEs, the PARF rebate cap will apply to those that are registered with COEs obtained from the second bidding exercise in February 2023 onwards and are subsequently deregistered within their PARF eligibility period.</p> <p>For cars that do not need to bid for COEs (e.g. taxis), the PARF rebate cap will apply to those that are</p>																						

S/N	Name of Tax Change	Existing Tax Treatment		New Tax Treatment
		<b>Age of Vehicle at Deregistration</b>	<b>PARF Rebate</b>	<p>registered on or after 15 February 2023 and are subsequently deregistered within their PARF eligibility period.</p> <p>The PARF cap does not apply to vehicles that are not eligible for PARF rebates, such as goods- cum- passenger vehicles, classic cars, and vehicles that have been laid-up.</p> <p>Further details will be announced by the LTA.</p>
		Age ≤ 5 years	75% of ARF	
		5 years < Age ≤ 6 years	70% of ARF	
		6 years < Age ≤ 7 years	65% of ARF	
		7 years < Age ≤ 8 years	60% of ARF	
		8 years < Age ≤ 9 years	55% of ARF	
		9 years < Age ≤ 10 years	50% of ARF	
		Age > 10 years	n.a.	



## EXCISE DUTIES FOR TOBACCO PRODUCTS

To discourage the consumption of tobacco products, we will raise the excise duties by 15% across all tobacco products. These tax changes will take effect on and after 14 February 2023:

**(A) Cigars, Cheroots, Cigarillos and Cigarettes, and Other Manufactured Tobacco:**

From \$427/kgm or 42.7 cents/stick of cigarette to \$491/kgm or 49.1 cents/stick of cigarette.

**(B) Beedies, Ang Hoon, and Other Smokeless Tobacco:** From \$329/kgm to \$378/kgm.

**(C) Unmanufactured and Cut Tobacco and Other Tobacco Refuse:** From \$388/kgm to \$446/kgm.

Harmonised System (HS) Code	Product Description	Current Excise Rate	New Excise Rate
<b>Cigars, Cheroots, Cigarillos and Cigarettes, and Other Manufactured Tobacco:</b>			
2402.20.20	Clove cigarettes	42.7 cents for every gram or part thereof of each stick of cigarette	49.1 cents for every gram or part thereof of each stick of cigarette
2402.20.90	Other cigarettes containing tobacco		
2402.90.20	Cigarettes of tobacco substitutes		
2402.10.00	Cigars, cheroots, and cigarillos, containing tobacco	\$427/kgm	\$491/kgm
2402.90.10	Cigars, cheroots, and cigarillos of tobacco substitutes		
2403.11.10	Water pipe tobacco packed for retail sale		
2403.11.90	Water pipe tobacco not packed for retail sale		
2403.19.19	Other smoking tobacco packed for retail sale		
2403.19.99	Other smoking tobacco not packed for retail sale		
2403.91.10	Homogenised or reconstituted tobacco packed for retail sale		
2403.91.90	Homogenised or reconstituted tobacco not packed for retail sale		
2403.99.30	Manufactured tobacco substitutes		
2403.99.40	Snuff, whether or not dry		

Harmonised System (HS) Code	Product Description	Current Excise Rate	New Excise Rate
2403.99.90	Other manufactured tobacco not for smoking	\$427/kgm	\$491/kgm
2404.11.00	Products containing tobacco or reconstituted tobacco, intended for inhalation without combustion		
2404.19.10	Products containing tobacco substitutes, intended for inhalation without combustion		
<b>Beedies, Ang Hoon, and Other Smokeless Tobacco:</b>			
2402.20.10	Beedies cigarettes	\$329/kgm	\$378/kgm
2403.19.11	Ang hoon packed for retail sale		
2403.19.91	Ang hoon not packed for retail sale		
2403.99.50	Chewing and sucking tobacco excluding snuff		
<b>Unmanufactured and Cut Tobacco, and Other Tobacco Refuse:</b>			
2401.10.10	Unmanufactured tobacco, not stemmed/stripped, Virginia type, flue-cured	\$388/kgm	\$446/kgm
2401.10.20	Unmanufactured tobacco, not stemmed/stripped, Virginia type, other than flue-cured		
2401.10.40	Unmanufactured tobacco, not stemmed/stripped, Burley type		
2401.10.50	Other unmanufactured tobacco, not stemmed/stripped, flue-cured		
2401.10.90	Other unmanufactured tobacco, not stemmed/stripped, other than flue-cured		
2401.20.10	Unmanufactured tobacco, partly or wholly stemmed/stripped, Virginia type, flue-cured		

Harmonised System (HS) Code	Product Description	Current Excise Rate	New Excise Rate
2401.20.20	Unmanufactured tobacco, partly or wholly stemmed/ stripped, Virginia type, other than flue-cured	\$388/kgm	\$446/kgm
2401.20.30	Unmanufactured tobacco partly or wholly stemmed/ stripped, Oriental type		
2401.20.40	Unmanufactured tobacco, partly or wholly stemmed/ stripped, Burley type		
2401.20.50	Other unmanufactured tobacco, partly or wholly stemmed/ stripped, flue- cured		
2401.20.90	Other unmanufactured tobacco, partly or wholly stemmed/ stripped, other than flue-cured		
2401.30.10	Tobacco stems		
2401.30.90	Other tobacco refuse		
2403.19.20	Other manufactured tobacco for the manufacture of cigarettes		

## FACTSHEET 1: CHANGE IN WORKING MOTHER’S CHILD RELIEF FOR THOSE WITH A QUALIFYING SINGAPORE CITIZEN CHILD BORN OR ADOPTED ON OR AFTER 1 JANUARY 2024

### **(A) Existing WMCR Treatment**

The Working Mother’s Child Relief (WMCR) amount for eligible working mothers with a qualifying child who is a Singapore citizen is as follows:

Child Order	WMCR Amount
1 <sup>st</sup>	15% of mother’s earned income
2 <sup>nd</sup>	20% of mother’s earned income
3 <sup>rd</sup> and beyond	25% of mother’s earned income

The total WMCR amount that an eligible working mother can claim for all her qualifying children is capped at 100% of the mother’s earned income for the YA. The total cap (i.e. Qualifying Child Relief (QCR)/ Handicapped Child Relief (HCR) plus WMCR) is \$50,000 per child.

- QCR/HCR claims will be allowed first (this can be claimed by either the working mother or her spouse or both) before WMCR.
- The WMCR is limited to the remaining balance after the QCR/HCR claim is allowed.

### **(B) New WMCR Treatment**

With effect from YA2025, the WMCR amount for an eligible working mother with respect to a qualifying child who is a Singapore citizen born or adopted on or after 1 January 2024 is as follows:

Child Order	WMCR Amount For a qualifying Singapore citizen child born or adopted <u>on or after</u> 1 January 2024
1 <sup>st</sup>	\$8,000
2 <sup>nd</sup>	\$10,000
3 <sup>rd</sup> and beyond	\$12,000

For qualifying Singapore citizen children born or adopted before 1 January 2024, there is no change to the WMCR that the eligible mothers can claim. Working mothers of these children can continue to claim the WMCR in respect of these children based on the existing design and quantum, i.e. based on a percentage of their earned income.

Child Order	WMCR Amount
	For a qualifying Singapore citizen child born or adopted <u>before</u> 1 January 2024
1st	15% of mother's earned income
2nd	20% of mother's earned income
3rd and beyond	25% of mother's earned income

The total WMCR amount that an eligible working mother can claim for all her qualifying children will remain capped at 100% of the mother's earned income for the YA. The existing cap of \$50,000 per child (i.e. QCR/HCR plus WMCR) will also remain unchanged. QCR/HCR claims will continue to be allowed first (this can be claimed by either the working mother or her spouse or both), before WMCR.

**(C) Example**

An eligible working mother has two qualifying Singapore citizen children, the first born in 2021 and the second born in 2024. For her YA2025 income, the mother can claim WMCR of 15% of her earned income in respect of her first child, and WMCR of \$10,000 in respect of her second child.

Birth Year of Child	Child Order	WMCR Amount in YA2025
2021	1st	15% of mother's earned income
2024	2nd	\$10,000

The total WMCR amount that an eligible working mother can claim for all her qualifying children is capped at 100% of the mother's earned income. The total cap (i.e. QCR/HCR plus WMCR) is \$50,000 per child.

- a. QCR/HCR claims will be allowed first (this can be claimed by either the working mother or her spouse or both) before WMCR.
- b. The WMCR is limited to the remaining balance after the QCR/HCR claim is allowed.

## ANNEX 2 – LIST OF KEY INFORMATION FOR THE EFS – M&A:

Key Information	Description
Eligibility	<p>1) Is a business entity<sup>1</sup>, registered and physically present in Singapore</p> <p>2) Has at least 30% local equity held directly or indirectly by Singaporean(s) and/or Singapore PR(s), determined by the ultimate individual ownership</p> <p>3) Has Group Annual Sales Turnover of not more than S\$500 million</p> <p><sup>1</sup> ACRA registered Sole Proprietorship, Partnership, Limited Liability Partnerships and Companies are eligible to apply for the scheme. Approval of the loan is subject to the PFI's assessment.</p>
Maximum Loan Quantum	<p>S\$50 million / borrower or borrower group<sup>2</sup></p> <p>Note: Borrowers are subject to an overall borrower group limit of S\$50 million for EFS – M&amp;A. In addition, there is an overall loan exposure limit of S\$50 million per borrower group across all facilities.</p>
Maximum Repayment Period	5 years
ESG Risk-share	The borrower is responsible to repay 100% of the loan amount. When defaults occur, the Participating Financial Institutions (PFIs) are obligated to follow their standard commercial recovery procedure, including the realisation of security, before they can make a claim against Enterprise Singapore for the unrecovered amount in proportion to the risk-share.
Interest Rate	Subject to PFIs' assessment of risks involved.

<sup>2</sup> Borrower Group consists of the following:

- a. Borrower; and
- b. corporate shareholders holding more than 50% at all levels up; and
- c. Subsidiaries where the Applicant company holds more than 50% shareholdings and subsequent subsidiaries at all levels down
- d. Subsidiaries where the Applicant's Ultimate Parent Company holds more than 50% shareholdings and their subsidiaries at all level down



## ANNEX 2 – LIST OF M&A SERVICES FOR BUYER AND SELLER:

Key Information	Description
Sell-side	<p>Finding the right buyer is key when selling a company to ensure that the business value is optimised for the seller.</p> <p>Mergers &amp; Acquisitions services include:</p> <ul style="list-style-type: none"> <li>• Analyse the market and ascertain the appropriate valuation metrics</li> <li>• Prepare an information memorandum or company deck card</li> <li>• Develop proposal and negotiation strategy</li> <li>• Negotiation of the terms of the transaction</li> <li>• Arrangement of financing if required</li> </ul>
Buy-side	<p>In accordance with specific investment needs and acquisition criteria of the buyer, M&amp;A helps in sourcing valuable targets across extensive regional and global networks.</p> <p>Merger and Acquisitions services include:</p> <ul style="list-style-type: none"> <li>• Develop the target criteria</li> <li>• Source for potential target</li> <li>• Analyse potential financial impacts/benefits of the acquisition</li> <li>• Develop acquisition proposal and negotiation strategy</li> <li>• Negotiation of the terms of purchase</li> <li>• Arrangement of financing, if required</li> </ul>
Fund raising	<p>There are various options and channels available for companies to raise funding in support of business growth and expansion.</p> <p>Merger and Acquisitions services include:</p> <ul style="list-style-type: none"> <li>• Develop growth and expansion plans</li> <li>• Strengthen corporate management</li> <li>• Develop business plans</li> <li>• Conduct feasibility studies</li> </ul>

# Contact Us

## Tax Advisory Specialists



**Edwin Leow**  
Director,  
Head of Tax  
edwinleow@sg.cla-ts.com



**Shaun Zheng**  
Director,  
Asset Management and  
Private Wealth Services Tax Lead  
shaunzheng@sg.cla-ts.com



**Koy Su Hiang**  
Associate Director,  
Business & International Tax Lead  
koyshiang@sg.cla-ts.com



**Jennifer Lee**  
Associate Director,  
GST Tax Lead  
jenniferlee@sg.cla-ts.com



**John Chua**  
Manager,  
M&A Tax Lead  
johnchua@sg.cla-ts.com



**Belinda Lim**  
Manager,  
Transfer Pricing Tax Lead  
belindalim@sg.cla-ts.com

## Merger & Acquisition Advisory Specialists



**Grace Lui**  
Director,  
Valuation & Transaction Services  
gracelui@sg.cla-ts.com



**Karen Lau**  
Associate Director,  
Valuation & Transaction Services  
karenlau@sg.cla-ts.com

## CLA Global TS (Formerly Nexia TS)

A: 80 Robinson Road, #25-00, Singapore 068898

T: (65) 6534 5700

F: (65) 6534 5766

E: connect@sg.cla-ts.com



CLA-TS.com



We have taken great care to ensure the accuracy of this newsletter. However, the newsletter is written in general terms, and you are strongly recommended to seek specific advice before taking any action based on the information it contains. No responsibility can be taken for any loss arising from action taken or refrained from on the basis of this publication © 2023 CLA Global TS (formerly Nexia TS).

With effect from 1 November 2022, Nexia TS rebrands as CLA Global TS following a strategic move of the entire firm joining CLA Global Limited (CLA Global), a leading global organisation comprised of independent accounting and advisory firms. CLA Global TS will be the member firm for Singapore, Southeast Asia and China; and be CLA Global's key leading firm in Asia. Led by the same leaders with more than 30 years of professional experience, CLA Global TS will continue to provide assurance, taxation, accounting, and various advisory services from locations in Singapore, China and Malaysia.

CLA Global TS (formerly Nexia TS) is an independent network member of CLA Global. See [CLAglobal.com/disclaimer](http://CLAglobal.com/disclaimer).