

## TABLE OF CONTENTS

	Page
<b>CHAPTER 1: INTRODUCTION TO SINGAPORE INCOME TAX</b> .....	1
<b>CHAPTER 2: TAX ADMINISTRATION</b> .....	61
<b>CHAPTER 3: INCOME</b> .....	105
<b>CHAPTER 4: DEDUCTIONS</b> .....	193
<b>CHAPTER 5: CAPITAL ALLOWANCES</b> .....	297
<b>CHAPTER 6: TAXATION OF BUSINESSES</b> .....	355
<b>CHAPTER 7: TAXATION OF RESIDENT INDIVIDUALS (PERSONAL RELIEFS)</b> .....	411
<b>CHAPTER 8: TAXATION OF NON-RESIDENTS</b> .....	471
<b>CHAPTER 9: TAXATION OF FOREIGN SOURCED INCOME</b> .....	515
<b>CHAPTER 10: GOODS AND SERVICES TAX</b> .....	575

## EXPANDED TABLE OF CONTENTS

	Page
<b>CHAPTER 1: INTRODUCTION TO SINGAPORE INCOME TAX</b> .....	<b>1</b>
¶1.01 Objective and scope .....	3
¶1.02 What is a tax? .....	3
¶1.03 Singapore legislative framework of income taxation .....	4
¶1.04 Interpretation of statutes.....	8
¶1.05 Income tax administration – seven learning points .....	15
¶1.06 Basic tax concepts – 101 .....	19
<b>CHAPTER 2: TAX ADMINISTRATION</b> .....	<b>61</b>
¶2.01 Overview of tax administration and why it is important .....	63
¶2.02 Stage 1 – Filing .....	67
¶2.03 Stage 2 – Assessment of income .....	78
¶2.04 Stage 3 – Collection of taxes, recovery or repayment of income tax .....	83
¶2.05 Stage 4 – Objections and appeals process.....	85
¶2.06 Voluntary Disclosure Program (VDP) .....	89
¶2.07 Advance Ruling System (“ARS”) .....	91
¶2.08 IRAS e-Tax Guides/Circulars pertaining to income tax administration.....	95
<b>CHAPTER 3: INCOME</b> .....	<b>105</b>
¶3.01 Part 1 – Understanding the charging Section of the Act .....	107
¶3.02 Part 2 – Income chargeable to tax .....	125
¶3.03 Part 3 – Exempt income.....	171
<b>CHAPTER 4: DEDUCTIONS</b> .....	<b>193</b>
¶4.01 Where you are now .....	196
¶4.02 Overview of the deductibility of an expense .....	198
¶4.03 A study of Section 15 – prohibited deductions.....	208
¶4.04 The general deduction formula in Section 14(1).....	216
¶4.05 A study of Section 14 - allowable deductions .....	229
¶4.06 Donations .....	285
¶4.07 Unutilised donations .....	288

<b>CHAPTER 5: CAPITAL ALLOWANCES</b> .....	<b>297</b>
¶5.01 Introduction – overview of discussion on capital allowances .....	299
¶5.02 Background and rationale.....	300
¶5.03 Case law principles governing how an item is classified as “plant” .....	302
¶5.04 Singapore context – determination of “plant” .....	310
¶5.05 Types of capital allowance claims.....	321
¶5.06 Dealing with disposals or write-offs of assets .....	340
¶5.07 Other scenarios concerning use of assets - plant and machinery used outside Singapore .....	346
¶5.08 Productivity and Innovation Credit (PIC) scheme.....	348
<b>CHAPTER 6: TAXATION OF BUSINESSES</b> .....	<b>355</b>
¶6.01 Introduction .....	357
¶6.02 Utilisation of unabsorbed capital allowances (carry forward) .....	367
¶6.03 Utilisation of unabsorbed losses (carry forward).....	371
¶6.04 Utilisation of unabsorbed donations (carry forward).....	372
¶6.05 Carry back relief system – introduction.....	380
¶6.06 Carry back relief system – utilisation of unabsorbed capital allowances .....	382
¶6.07 Carry back relief system - utilisation of unabsorbed losses .....	383
¶6.08 Carry back relief system – order of set-off .....	383
¶6.09 Summary of carry forward relief and carry back relief.....	384
¶6.10 The shareholdings test.....	386
¶6.11 Group relief.....	392
¶6.12 One-tier corporate tax system .....	400
¶6.13 Tax computation of a company.....	401
<b>CHAPTER 7: TAXATION OF RESIDENT INDIVIDUALS (PERSONAL RELIEFS)</b> .....	<b>411</b>
¶7.01 Introduction .....	413
¶7.02 Tax computation of a resident individual .....	441
¶7.03 Personal reliefs available to a resident individual – Section 39 of the Income Tax Act (“the Act”) .....	443

¶7.04 Tax rebates.....	459
¶7.05 Sample case .....	462
<b>CHAPTER 8: TAXATION OF NON-RESIDENTS</b> .....	<b>471</b>
¶8.01 Singapore income tax implications – residents vs. non-residents.....	473
¶8.02 Section 12 – Deemed source provisions.....	474
¶8.03 Common deemed source income scenarios in Singapore - Section 12(6) payments – interest, etc.....	476
¶8.04 Common deemed source income scenarios in Singapore - Section 12(7) payments – royalties, etc.....	481
¶8.05 Other deemed source income scenarios - Section 12(1) - non-residents deriving trade/business income in Singapore .....	486
¶8.06 The withholding tax system in Singapore.....	491
¶8.07 Common forms of relief for non-resident individuals deriving income in Singapore .....	508
<b>CHAPTER 9: TAXATION OF FOREIGN SOURCED INCOME</b> .....	<b>515</b>
¶9.01 What is foreign sourced income? .....	517
¶9.02 What happens when foreign sourced income is received in Singapore? .....	517
¶9.03 The concept of double taxation .....	518
¶9.04 General forms of double taxation relief .....	519
¶9.05 What are the forms of double taxation relief in Singapore? .....	527
¶9.06 Tax treaties – application and interpretation .....	554
¶9.07 Singapore’s tax treaties – specific features.....	561
<b>CHAPTER 10: GOODS AND SERVICES TAX</b> .....	<b>575</b>
¶10.01 Goods and Services Tax (GST) in Singapore – how it came to be.....	577
¶10.02 The Goods and Services Tax Act (GSTA).....	577
¶10.03 How GST works – mechanics of GST.....	579
¶10.04 How is GST imposed - GSTA charging section .....	580
¶10.05 Key concepts of GST .....	591
¶10.06 GST case examples.....	597
¶10.07 Understanding disbursements and reimbursements .....	602

¶10.08	GST relief rules .....	616
¶10.09	Computing GST liability .....	620
¶10.10	Recoverability of input tax claims .....	621
¶10.11	GST registration and deregistration – conditions and process.....	626
¶10.12	GST administration cycle – assessment, objections, appeals and collection .....	630
¶10.13	GST offences and penalties.....	632
¶10.14	Assisted Self-Help Kit (“ASK”) .....	633
¶10.15	Advance Ruling System (“ARS”).....	635
¶10.16	Appendix I – Summary of the types of supply and the GST output tax and input tax implications for a GST registered trader .....	640

# CHAPTER 1

## INTRODUCTION TO SINGAPORE INCOME TAX

¶1.01	Objective and scope.....	3
¶1.02	What is a tax?.....	3
	• Brief look at the beginnings of taxation .....	3
	• General observations on taxation.....	4
¶1.03	Singapore legislative framework of income taxation .....	4
	• Income tax law in Singapore .....	5
	• Singapore Income Tax Act (Cap. 134, 2014 Ed.).....	5
	• Subsidiary legislation.....	5
	• Economic Expansion Incentives (Relief from Income Tax) Act (Cap. 86, 2005 Rev. Ed.).....	6
	• IRAS e-Tax Guides.....	7
¶1.04	Interpretation of statutes .....	8
	• Purposive approach in statute interpretation .....	8
	• Ratio decidendi.....	10
	• Obiter dicta.....	10
	• Frequently applied common law rules for statutory interpretation .....	10
	• Extrinsic aids v intrinsic aids.....	11
	• Structure of the Income Tax Act.....	14
¶1.05	Income tax administration – seven learning points.....	15
¶1.06	Basic tax concepts – 101 .....	19
	• What is the nature of the Singapore tax jurisdiction ie the scope of taxation? .....	20
	• Who is assessable to tax?.....	25
	• How many forms of business entity are there? .....	26
	• What is the basis period of assessment? .....	27
	• Who is regarded as a tax resident? How is tax residency determined?.....	30