Moving to Singapore

TTN Conference Hong Kong

Sanjay Iyer 27 February 2017



SINGAPORE | HONGKONG 20 YEARS IN PRACTICE

AGENDA

- 1. Why Move to Singapore?
- 2. Registering in Singapore
 - 3. Immigration
 - 4. Tax Incentives
 - 5. Personal Tax

lyer Practice ADVISERS

SINGAPORE | HONGKONG 20 YEARS IN PRACTICE





Tax **Incentives** Personal Tax Rates

Geographical Location





Branch vs. Subsidiary



Branch

Foreign tax purposes Public disclosure



Subsidiary

Tax treaty
benefits
Less public
disclosure
Audit exemption

Bank Account





CRS



CRS

16 Bilateral CAAs 1 January 2017





Employment Pass





PR / Citizenship





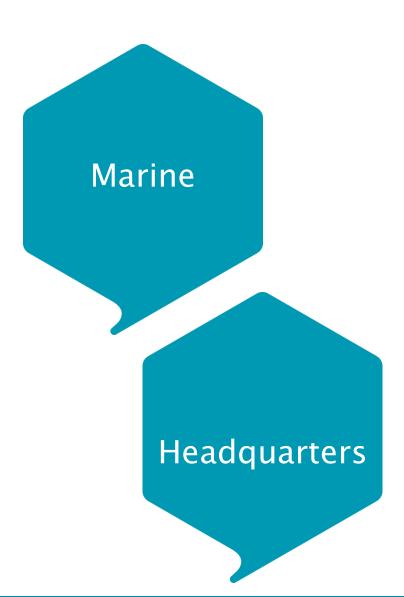


Tax Factors



Fund Management

Trading





Basic Corporate Tax System

- Residence basis: Management and Control
- Basis of Taxation: Territorial tax system with remittance based tax
- Normal Corporate Tax rate: 17% (Partial exemption (\$\$300k) [75% (S\$10k) / 25% (S\$290k)])
- Capital Gains Tax: None (except trading gains); Safe Harbour (2 yrs, 20%)
- WHT: Services (17%); Interest (15%); Royalties (10%); Dividends (0%)
 - [Such rates may be reduced by DTAs]

SASIC CORPORATE TAX SYSTEM

Fund Management

Q

- Exemption of fund income:
 - Section 13R: Singapore companies
 - Section 13X: Other entities
 - Section 13CA: Offshore funds
- Tax treaty benefits: Singapore resident companies
- 10% tax on fund management income for the local fund manager

Marine



- Automatic exemption on shipping profits Singapore flagged ships
- AIS Scheme Foreign flagged ships
 - Tax resident in Singapore
 - Fleet size, head count, local business spending
- Ships include oil rigs
- Also includes ship financing, leasing, logistics

Global Trader Programme

- 5% or 10% on trading specific commodities (for 3 to 5 years)
- Income from physical trading, brokering of physical trades and derivative trading income.
 - Turnover
 - Local business spending
 - No. of persons employed

Operational Headquarters

- 5% or 10%
- Incentive only on headquarter function income
- Regional or International Activities
- Business plan: incremental business spending and professional employment

IP Development Incentive ("IDI")

0

- IP income
- Budget 2017
- BEPS compliance modified nexus approach
- IP income will removed from all other incentives (from 1 July 2021)
- IDI will take effect from 1 July 2017.



Basis of Taxation

- Territorial tax system
- No capital gains tax (unless it is beneficial for the taxpayer to be taxable, e.g. DTA)

Income (US\$)	ETR (%)
100,000	8%
200,000	13%
265,000	15%

22% marginal tax rate above US\$230,000 of income

NOR Scheme

0

- Greater than 90 days outside Singapore
- Minimum US\$140,000 of income
- Tax exemptions on days outside Singapore for business, subject to a minimum effective tax rate of 10%.

CONTACT US

Contact Us

O

Sanjay Iyer

Email sanjay@iyerpractice.com

Phone +852 2529 9952

Mobile +852 9355 3495

Unit 29E, 29/F Admiralty Centre Tower 1 18 Harcourt Road, Admiralty

To keep yourself updated on new developments in Singapore and Hong Kong, please subscribe online to our free quarterly newsletter via our website: **iyerpractice.com**

Disclaimer: This presentation of slides is intended as a general guide only, and the application of its contents to specific situations will depend on the particular circumstances involved. Accordingly, readers should seek appropriate professional advice regarding any particular problems that they encounter, and this presentation should not be relied on as a substitute for this advice. While all reasonable attempts have been made to ensure that the information contained in this presentation is accurate, lyer Practice accepts no responsibility for any errors or omissions it may contain, whether caused by negligence or otherwise, or for any losses, however caused, sustained by any person that relies on it.

Hong Kong