

Name of Tax Change	Current Treatment	New Treatment
<p>Extension of and enhancement to listed real estate investment trusts (“REIT”) concessions</p>	<p>(a) The following income tax, stamp duty and GST concessions for listed REITs expire in 2010:</p> <ul style="list-style-type: none"> <li>(i) Concessionary income tax rate of 10% for non-resident non-individual investors;</li> <li>(ii) Stamp duty remission on the transfer of a Singapore immovable property to a REIT;</li> <li>(iii) Stamp duty remission on the transfer of 100% of the issued share capital of a Singapore-incorporated company that holds immovable properties situated outside Singapore to a REIT;</li> <li>(iv) GST remission to allow REITs to claim input tax on their business expenses regardless of whether they hold the underlying assets directly or indirectly through multi-tiered structures such as special purpose vehicles or sub-trusts.</li> </ul> <p>(b) Listed REITs and wholly-owned Singapore subsidiary companies of listed REITs can enjoy income tax exemption on qualifying foreign-sourced income (i.e. foreign-sourced dividend income, interest income and trust distributions) under Section 13(12) of the Income Tax Act, subject to conditions [“Foreign-Sourced Income Exemption (“FSIE”) for REITs”]. There is currently no sunset clause for this income tax concession.</p>	<p>(a) The existing income tax, stamp duty and GST concessions for listed REITs, which expired on 17 February 2010, will be renewed for the period from 18 February 2010 to 31 March 2015 (both dates inclusive).</p> <p>(b) The FSIE income tax concession for listed REITs will be subject to a sunset clause of 31 March 2015. This means that for the FSIE to apply to listed REITs or wholly-owned Singapore subsidiary companies of listed REITs (which have been granted or will be granted the FSIE), the qualifying foreign-sourced income should be remitted on or before 31 March 2015.</p> <p>(c) The current requirement for unlisted REITs to be listed within one month (from the date of completion of the agreements for sale) in order to qualify for the stamp duty remissions will be liberalised to listing within six months.</p>