

IRAS e-Tax Guide

GST: Clarification on “Directly in Connection With”
and “Directly Benefit”
(Third Edition)



INLAND REVENUE
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CLARIFICATION ON "DIRECTLY IN CONNECTION WITH" AND "DIRECTLY BENEFIT"

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CLARIFICATION ON "DIRECTLY IN CONNECTION WITH" AND "DIRECTLY BENEFIT"

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1 INTRODUCTION

- 1.1 Section 21(3) of the GST Act provides for zero-rating relief on a supply of services to the extent that the services are international services.
- 1.2 There are 2 categories of supplies of services upon which the relief may not apply:
 - (a) Where there is a direct connection between the supply of services and goods or land situated in Singapore, the supply cannot be zero-rated.
 - (b) Where there are local persons who stand to derive benefits from their consumption of the services, the supply, too, cannot be zero-rated¹
- 1.3 The Goods and Services Tax (Amendment) Act 2004 has clarified the definition of services considered as not provided to local persons in Section 21(3) of the GST Act by replacing the expression 'for and to' with the expressions 'under a contract with' and 'directly benefit." That is, zero-rating is allowed on services that are provided contractually to and beneficially for person(s) outside Singapore.
- 1.4 This tax guide provides guidance on the interpretation and application – to common business scenarios – of the 2 expressions 'directly in connection with' and 'directly benefit," as they are used in Section 21(3). Ultimately, the Comptroller will have to examine the substance of the business arrangements to determine the accuracy of the application of the 2² expressions as provided in Section 21(3).

2 DIRECTLY IN CONNECTION WITH

2.1 Occurrence Of The Expression²

- 2.1.1 The expression "directly in connection with" is used in Sections 21(3)(e), (f), (g), (h) and Section 21(4C) of the GST Act to describe the relationship between a supply of services and goods or land.
- 2.1.2 A supply cannot be zero-rated under Section 21(3)(j) where the services are supplied directly in connection with goods or land situated in Singapore.
- 2.1.3 A supply is zero-rated where the services are supplied directly in connection with goods or land situated outside Singapore in Sections 21(3)(e) and (f), or goods to be exported out of Singapore in Sections 21(3)(g) and (h)³.

¹ This is in the context of Sections 21(3)(g), (j), (k), (s) of the GST Act,

² Appendix 1 lists the relevant Sections

³ Subject to other conditions in the Act as may be appropriate

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2.2 Determining Whether The Supply Is "Directly In Connection With" Goods Or Land

2.2.1 The expression "in connection with" suggests that there is a relationship between two subject matters. The adverb "directly" is added to emphasize that there should be a clear and direct nexus between the two subject matters that makes the relationship a sufficiently close one.

2.2.2 Paragraph 2.3 describes the situations in which the Comptroller will consider the services to be directly in connection with goods or land. Paragraph 2.4 gives some examples where the Comptroller will not consider the services to be directly in connection with goods or land.

2.3 Situations In Which A Supply Is Considered To Be "Directly In Connection With" Goods Or Land

2.3.1 The GST Act⁴ provides specifically that the following services are considered to be directly in connection with land:

- (a) The construction, alteration, repair, maintenance or demolition of any building or any civil engineering work;
- (b) Services supplied by estate agents and auctioneers, architects, surveyors and engineers relating to land.

2.3.2 Where the GST Act does not provide specifically for a service to be directly in connection with goods or land, the following are situations where the Comptroller will consider the service to be directly in connection with goods or land. The goods or land must be identifiable⁵ in all situations.

- (a) The supply involves physical work done on the goods or land in a way that changes or affects the goods or land. Some examples are:
 - (i) Installation, alteration, repair, cleaning, restoration or modification of goods.
- (b) The supply involves physical contact or interaction with the goods or land but does not change the goods or land physically. Some examples are:

⁴ These services are specified as supplied directly in connection with land under section 21(4) of the GST Act in the context of land situated outside Singapore under section 21(3)(e). Please refer to Appendix 1 for the relevant sections.

⁵ Goods are identifiable by their model type or serial number etc., whereas land is identifiable by the address, legal description etc.

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- (i) Transportation of goods from one place to another;
 - (ii) Security services in relation to goods; and
 - (iii) Warehousing or storage services for goods.
- (c) The supply establishes the physical attributes (such as quantity, size, or value) of the goods or land. Some examples are described below:
- (i) Provision of testing and certification services for water pipes to ensure safety standards of the goods. In this case, the assessor may have to test and certify that the water pipe is of a certain uniform thickness so as to withstand the expected water pressure;
 - (ii) Provision of physical stocktaking services to a warehouse trader to verify the accuracy of records of goods stored in the warehouse kept for compliance with certain regulations; and
 - (iii) Provision of valuation services to a property owner to establish the value of his property. This service would require the supplier to examine the furnishing, fittings and conditions of the property to determine its value.
- (d) The supply affects (or its purpose is to affect) or protects the nature or value (including indemnity against loss) of goods or land. An example is:
- (i) It is common for a company to take up fire insurance for their building. In the event of a fire, the company is compensated for the damages to the building caused by the fire. The service provided by the insurance company protects the value of the building.
- (e) The supply affects, or proposes to affect, the ownership of the goods or land including any interest in or right over goods or land. Some examples are:
- (i) Auctioning services for goods;
 - (ii) Supply of a right or an option to buy goods (e.g. granting of an option to purchase property or assets);
 - (iii) Conveyance services on properties; and
 - (iv) Provision of mortgage loans specifically to enable the purchaser to own the property. As the provision of a mortgage loan affects

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the ownership of land, it is considered as supplied directly in connection with land.

2.4 Situations In Which A Supply Is Not Considered To Be "Directly In Connection With" Goods Or Land

2.4.1 The Comptroller will consider the following situations to be generally not directly in connection with goods or land:

- (a) The supply of services does not relate to any specific goods or land at all. Some examples are:
 - (i) Debt recovery services;
 - (ii) Accounting and auditing services;
 - (iii) Provision of credit facilities where assets may be used as collateral;
 - (iv) Photography services;
 - (v) Feasibility study or market research (e.g. research services on the economic viability of a shopping complex at Orchard Road); and
 - (vi) Marketing services where activities relate only to the raising of awareness of a particular brand or creating goodwill for the brand (Also commonly known as "brand asset management" or 'partner relationship management). Such activities include publicity campaigns, managing public relations; media releases and advertisements to promote a particular brand name. It is important that in the provision of service, no specific goods or land be identified.
- (b) There are no identifiable goods or land for which the services are supplied. Some examples are:
 - (i) Advisory services on land prices or property markets in general and no specific land or property is identified; and
 - (ii) Architectural services that do not relate to an identifiable piece of land.
- (c) There are identifiable goods or land but the services do not fall within any of the situations (a) to (e) described in paragraph 2.3.2.
 - (i) Company A outsourced its call center to Company B. Company B provides services such as advising Company A's customers on

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maintenance or technical issues relating to certain equipment sold by Company A. Although the equipment is identifiable, the call center services provided by the Company B to the Company A are not treated as directly in connection with goods as they do not fall within any of the situations described in paragraph 2.3.2.

- (ii) Mr X took up a credit line for a new venture with a bank and he pledges a factory premise that he owned as collateral. Although the property is identifiable in this case, the provision of the credit line does not affect the ownership, interest in or right over the property. The credit line services provided by the bank is not considered as directly in connection with land.

2.5 Points To Note

- 2.5.1 Certain financial services are prescribed as international services. Similar services not within the scope of the prescribed services will have to satisfy the relevant provisions in Section 21(3) for them to be zero-rated. Thus, financial services treated as directly in connection with goods to be exported under Section 21(3)(h) may not necessarily be treated as directly in connection with goods in other provisions.
- 2.5.2 For example, the granting of credit directly relating to the export of goods outside Singapore is a prescribed financial service under section 21(3)(h). This does not render the granting of credit for import of goods to be directly in connection with goods in Singapore. The granting of credit is merely a financial arrangement and the service does not affect the underlying goods in any manner described in paragraph 2.3.2. Thus the granting of credit for import of goods would not be considered as directly in connection with the goods.
- 2.5.3 Advertising services are presently guided by the rules set out in the eTax Guide "GST and the Advertising Industry" They are still applicable in the determination of whether the advertising services are directly in connection with goods or land⁶.
- 2.5.4 Where only part of a supply of services is supplied directly in connection with goods or land situated outside Singapore, only that part of the services may be zero-rated. A reasonable basis of apportionment should be used to apportion the consideration for the supply. Paragraph 4 describes some methods of apportionment.
- 2.5.5 Neither the situations nor the examples listed in paragraph 2.3 and 2.4 are intended to be exhaustive. However, they should cover the commonly

⁶ A review is presently ongoing and the e-Tax Guide will be updated in due course.

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encountered services and provide sufficient guidance on the correct GST treatment.

3 DIRECTLY BENEFIT

3.1 The Goods and Services Tax (Amendment) Act 2004 makes clear that a supply of service has to be 'under a contract with' and 'directly benefits' person(s)⁷ belonging outside Singapore before it can be zero-rated under Sections 21(3)(j), (k) or (s).

3.2 Hence, there are 2 conditions to be satisfied.

(a) Firstly, the Comptroller needs to be satisfied of the presence of a contract with an overseas person.

(b) Then will he proceed to consider whether the supply 'directly benefits' person(s) belonging outside Singapore.

3.3 Whether a contract exists or not is a question of fact to be determined by the Comptroller on the basis of the information available to him.

3.4 Where the contract for services is with a local person, the supply cannot be zero-rated under Sections 21(3) (j), (k) and (s) regardless of whether the supply "directly benefits" person(s) belonging outside Singapore.

3.5 Where the contract for services is with an overseas person, the Comptroller will consider all persons who enjoy the services as beneficiaries of the supply of services. For each of the beneficiary, the Comptroller will determine whether the services supplied "directly benefit" the beneficiary.

3.6 Occurrence Of The Expression⁸

3.6.1 The expression 'directly benefit' is used in Sections 21(3)(j), (k), and (s).

3.6.2 A supply may be zero-rated under any of these provisions where it is established that the services supplied "directly benefit overseas person(s), subject to other conditions in the Act as may be appropriate.

3.6.3 Where it is established that the services supplied "directly benefit local persons, the supply cannot be zero-rated under these provisions.

⁷ The person to whom the contract is made and the person who directly benefits from the services may be the same person or different persons.

⁸ Appendix 1 lists the relevant Sections.

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3.7 Directly Benefit – Examine The Contract

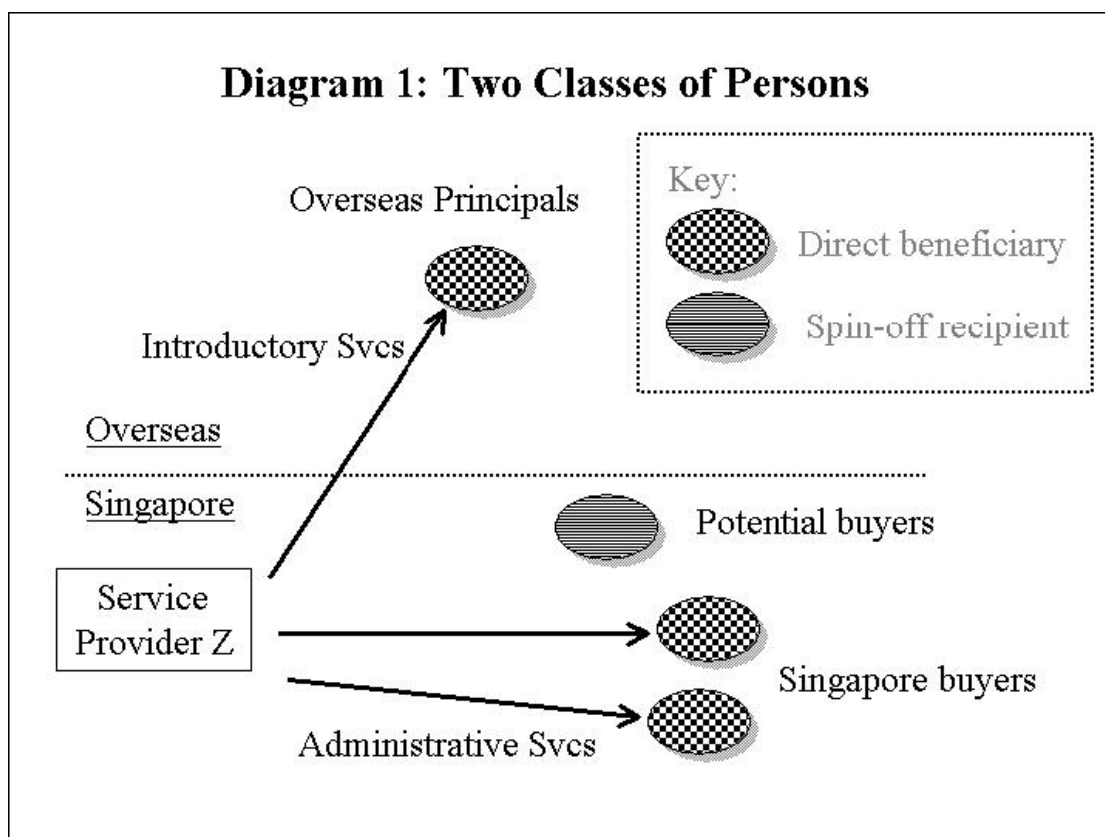
- 3.7.1 The difficulty in the application of the expression "directly benefit" is one of scope – traders are not sure to what extent they are required to trace the benefits conferred by the supply, when it seems that everyone, even the person most remote from the transaction, benefits from the supply of services in one way or another. As such, traders are concerned that they will be unable to identify all the 'beneficiaries' of the supply and charge GST, to the satisfaction of the Comptroller.
- 3.7.2 The key is to distinguish between the person on whom the supply confers benefits directly, and the person on whom the supply confers benefits but not in a direct manner.
- 3.7.3 In practice, the Comptroller will first look at the contract governing the supply of services. If the contract stipulates the recipients of the services, to the exclusion of other persons, the Comptroller will consider the supply to "directly benefit" all these recipients.
- 3.7.4 However, it is possible that the contract is worded in an open-ended manner, such that it admits the possibility of services being provided to other as yet unidentified persons. In this case, the contract will fail the "to the exclusion of other persons" condition, and the Comptroller will proceed to examine the flow of services/benefits to ensure all the persons the supply 'directly benefits' are identified.
- 3.7.5 Take the case of a global contract arrangement in which 2 overseas multinational companies enter into a contract. Company Q provides services to Company P on a worldwide basis. Q sub-contracts the job in the Southeast Asia region to its Singapore subsidiary, T.
- 3.7.6 The contract between T and Q states clearly that T is to service all subsidiaries of P in Southeast Asia, including those in Indonesia, in Malaysia, and in Singapore, and no one else. T then acts according to the terms of the contract and services the existing Indonesian, Malaysian and Singaporean subsidiaries of P, and no one else.
- 3.7.7 In determining whether T can zero-rate its supply, the Comptroller will treat the 3 subsidiaries of P – and no one else – as the only persons the supply directly benefits. Since not all the 3 subsidiaries are overseas persons, T cannot apply zero-rating to the whole supply. The supply has to be apportioned.
- 3.7.8 The terms of the contract between T and Q satisfy the 'to the exclusion of other persons' condition, because it is possible to identify all the subsidiaries of P in Southeast Asia at any point in time.

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3.8 Directly Benefit – Examine The Flow Of Services/Benefits

- 3.8.1 Only in the absence of a contractual provision of the kind described in the preceding paragraphs, then will Comptroller proceed to examine the flow of services/benefits. The flow of benefits mirrors that of the services – benefits arise only where services are performed/received.
- 3.8.2 In general, there are 2 classes of persons that the service provider may think that his supply of services “benefits.” In fact, the Comptroller's interpretation of the law is such that the supply of services 'directly benefits' only 1 of these 2 classes of persons. Diagram 1 illustrates.
- 3.8.3 Take the case of a Singapore service provider Z that acts as the representative office for its overseas principals in performing the following activities.
- (a) Sources for buyers throughout the region to purchase hand tools that the overseas principals manufacture.
 - (b) Handles administrative work in relation to the purchases.
 - (c) Liaises with freight forwarders on the logistical aspects of goods imported into Singapore, if the buyers are Singapore persons.
- 3.8.4 Z provides introductory services to his overseas principals by seeking out potential buyers for them. Some of these potential buyers may eventually decide to buy the hand tools, and Z will handle the paperwork and delivery (as part of his services to the overseas principals) – administrative services. Therefore, Z services both its overseas principals and the (eventual) buyers of the hand tools. Both the overseas principals and the buyers belong to the class of persons whom the supply of services 'directly benefits.'
- 3.8.5 Z may be concerned whether the Comptroller considers the supply to also "directly benefit" those potential buyers that he contacted but who did not end up buying the hand tools. This is because these persons somehow benefited from the supply of introductory services from Z to its overseas principals, in the sense that they got to learn of the availability of such hand tools in the market, etc. However, in reality, Z did not perform any service for these persons at all. The benefits that they derived are considered "spin-offs".

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3.8.6 However, because the main service Z provides is the introductory services to its overseas principals, the Comptroller will regard the administrative services to the Singapore buyers as incidental to the service provided to Z, provided that there is no separate contract for service between Z and the local buyers. The entire supply can be zero-rated.

3.9 Points To Note About Directly Benefit

3.9.1 Spin-off Recipient is Not a Direct Beneficiary. As described in the preceding paragraphs, spin-off recipients, such as those who potentially gain benefits from a supply, are not direct beneficiaries.

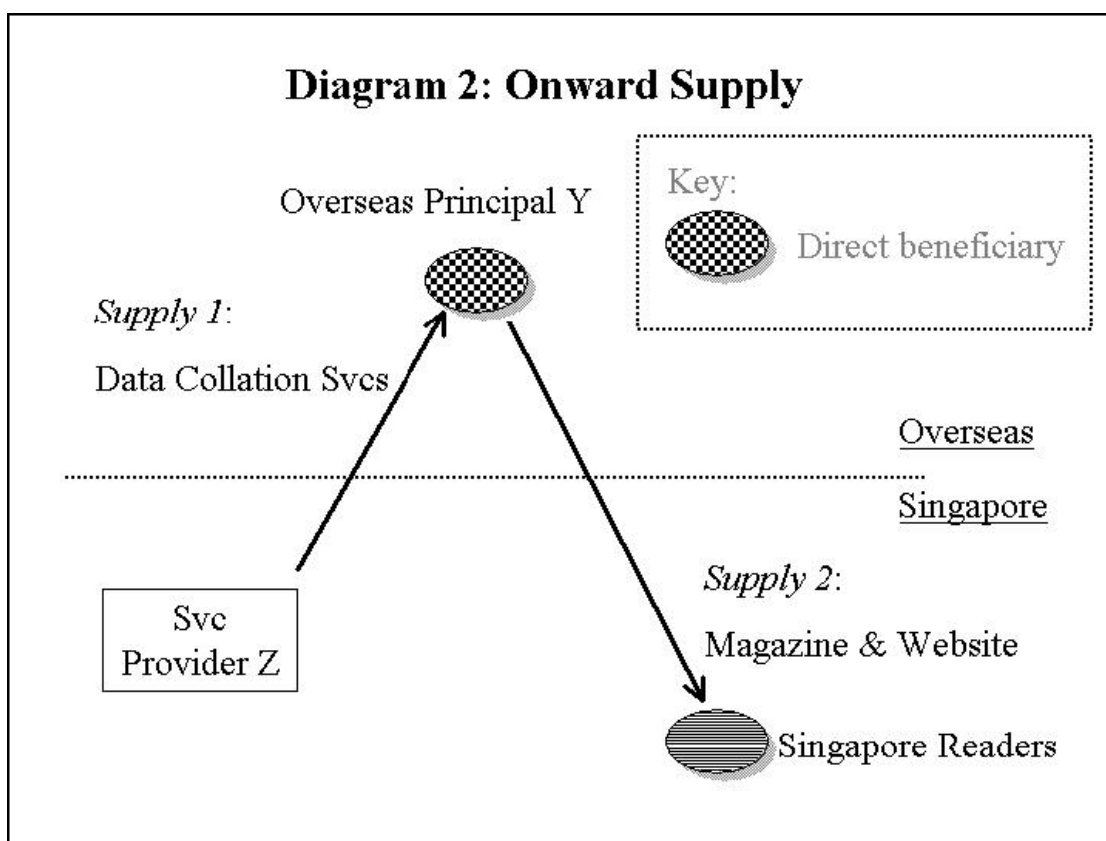
3.9.2 Buyer May Not Be Beneficiary. The person entering into the contract does not have to be the same person as the person receiving the services [Section 21(4A)]. For example, a Regional Headquarters (RHO) in Hong Kong can enter into a contract with a Singapore firm to service its subsidiary in Singapore, without the HK RHQ receiving any of the services at all. Hence, it is possible for the supply not to 'directly benefit' the RHQ, even though it contracted for the services.

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3.9.3 No Relation to Magnitude of Consumption. The word 'direct' does not connote magnitude. The supply of services 'directly benefits' a person who receives the services even if it can be shown that the person only consumes a small proportion of the services relative to the other beneficiaries.

3.9.4 Onward Supply. It is possible for a person to appear to be gaining advantage from a supply X but in reality he is gaining it from another supply Y. This confusion typically arises in transactions involving onward supply.

(a) Consider the case of an overseas company Y that engages the services of a GST-registered business Z to collate information that would be published in its magazine and website. Persons in Singapore may subsequently pay to read the information on the website or the magazine. Diagram 2 illustrates:



(b) Confusion may arise over whether the Singapore readers of the magazine and the website are considered 'direct beneficiaries' of the supply of data collation services provided by Z, because they eventually get to see the findings of the data collated by Z.

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- (c) There are in fact 2 supplies. Supply 1 is the data collation services Z provides to Y as part of its contract. Y then publishes the findings in its magazine and website, and sells the information to the Singapore readers in another supply. Supply 1 does not directly benefit the Singapore readers.

3.10 Hence, a supply of services "directly benefits" only those recipients to whom the services flow in a manner with no impediment. All these recipients (and the person contracting for the supply of services) have to be overseas person⁹ for the supply to enjoy full zero-rating. Where not all direct beneficiaries are overseas persons, the supply of services may be zero-rated to the extent that the services directly benefits overseas persons and the services are not directly in connection with goods or land in Singapore. Paragraph 4 describes some methods of apportionment.

4 METHODS OF APPORTIONMENT

4.1 As an administrative concession, the Comptroller will allow the apportionment of the value of the supply of services such that only the portion of services that directly benefits local persons need to be standard-rated. The remaining portion of services that directly benefits overseas persons and is not directly in connection with land or goods in Singapore can still enjoy the zero-rating.

4.2 The Comptroller accepts the following proxies in apportioning the value of the services:

- (a) Prices of each portion of the services performed for the local and overseas direct beneficiaries. This refers to the market price that the local supplier would have charged if the services performed for the overseas and local persons had been supplied under separate contracts.
- (b) Costs of making each portion of the services. This can include both direct and indirect costs incurred by the local supplier in the course of performing the services. It is up to the supplier to decide on the most appropriate cost driver(s) to be used to compute the costs of making each portion of the services performed for the overseas and local persons.
- (c) Amount of time taken to perform each portion of the services. This is an appropriate proxy for supplies that are dependent on the expertise of the manpower required to perform the services e.g. engineering services, information technology related services and consultancy services.

⁹ Section 15 of the GST Act determines the belonging status of a recipient of services

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- 4.3 You may also use any other proxy that is considered reasonable in the circumstances of a particular supply of services. For example, where a local company supplies marketing support services to its overseas related company, the local company may use the proportion of sales revenue supported by the local company on goods delivered in Singapore to the total sales revenue supported by the local company as a proxy to apportion the total service fees derived from its overseas related company.
- 4.4 It is not necessary to seek prior approval from the Comptroller in using any of the above as proxy in the apportionment. The method chosen should be based on a consideration of all the circumstances and not because it gives a particular result. It should also be consistently applied throughout all relevant transactions.
- 4.5 As part of the record-keeping requirements as a GST-registered person, you need to keep records that:
- (a) Explain the method you choose; and
 - (b) Detail all transactions and other acts in which you engage and which are relevant to the supplies you make.

5 INPUT TAX CLAIMS BY LOCAL BENEFICIARY

- 5.1 In the case of a global contract where a local supplier contracts with an overseas customer to perform services that directly benefit a local person, we recognize that the GST burden on the overseas customer may have an adverse impact on the international competitiveness of our local service sector. As an administrative concession, we will allow the local beneficiary to claim the GST charged by the local supplier to the overseas customer as the local beneficiary's input tax credit provided certain conditions are met.
- 5.2 For the local beneficiary to be eligible for input tax credit, the following conditions must be satisfied
- (a) The local beneficiary is registered for GST;
 - (b) The local beneficiary has paid GST on the portion of the standard-rated services received by him and maintains documentation to support this payment. Examples of supporting documents can include an invoice issued by the overseas supplier which reflects the amount of the GST charge passed on by the overseas supplier and included in the price charged to the local beneficiary, or a tax invoice issued by the local supplier to charge the GST on the portion of the standard-rated services directly to the local beneficiary; and

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(c) The local beneficiary satisfies the normal input tax claiming conditions under Sections 19 and 20 of the GST Act, had the supply been made to him directly.

5.3 A local beneficiary who wishes to avail himself of this administrative concession is required to seek prior approval from the Comptroller in writing before making the input tax claim in his GST return. In his request for approval to claim the input tax, the local beneficiary is required to furnish a detailed description of the global contract arrangement (including the name and GST registration number of the local supplier) and a written undertaking that conditions (a) to (c) listed above have been satisfied.

6 A TYPICAL CASE SCENARIO

6.1 Facts Of The Case

6.1.1 A Singapore company (Company A) enters into an agreement with an overseas company (Company B) to provide maintenance services on machinery sold by Company B to their customers in the Asia Pacific region (including Singapore).

6.1.2 Whenever a customer requires the maintenance services, he will contact Company B, which will then instruct Company A to carry out the work. Company A will dispatch their engineers to the customer's site to perform the maintenance services.

6.1.3 Company A bills Company B maintenance charges based on the number of man-hours spent by their engineers at the customers' sites plus a fixed fee of S\$500 on a monthly basis.

6.2 Illustration Of "Directly In Connection With"

6.2.1 The supply involves physical work done on the machinery and also protects the nature and value of the machinery owned by Company B's customers. Hence, it is considered to be directly in connection with the machinery (goods).

6.2.2 As some of the machineries serviced by Company A are situated in Singapore, part of the supply is directly in connection with goods situated in Singapore at the time the services are performed.

6.3 Illustration Of "Directly Benefit"

6.3.1 The nature of the supply is that of maintenance services performed on machinery owned by Company B's customers.

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6.3.2 Company B's customers are the direct beneficiaries because they receive the maintenance services directly from Company A. Company B is, however, not a direct beneficiary because it does not receive any maintenance services.

6.4 Taxability

6.4.1 Only the portion of maintenance services on machinery situated outside Singapore will qualify for zero-rating under section 21(3)(f) of the GST Act. The remaining portion that relates to machinery located in Singapore will have to be standard-rated.

6.5 Apportionment

6.5.1 Company A can use the proportion of man-hours spent by their engineers at Singapore sites to the total number of man-hours spent for the month. Company A can then apply this fraction to the total sum charged to Company B for that month to calculate the portion of the value of supply that should be standard-rated. A numerical worked example is shown as follows:

6.5.2 Assume that for the month of Sept 2005, the total number of man-hours spent is 2000 hrs and the total maintenance charges to Company B is S\$100,000. Out of the 2000 hrs, the amount of time spent at Singapore sites is 500 hrs.

$$\begin{aligned} \text{Value of standard-rated supply} &= \frac{500 \text{ hrs}}{2000 \text{ hrs}} \times \text{S\$}100,000 \\ &= \text{S\$}25,000 \end{aligned}$$

$$\begin{aligned} \text{Value of zero-rated supply} &= \frac{2000 \text{ hrs} - 500 \text{ hrs}}{2000 \text{ hrs}} \times \text{S\$}100,000 \\ &= \text{S\$}75,000 \end{aligned}$$

6.5.3 Assuming that the Singapore customers can satisfy the conditions (a) to (c) stated in paragraph 5.2, they may request in writing for the Comptroller's approval to claim the GST charged by Company A to Company B.

7 CONTACT INFORMATION

7.1 For enquiries on this e-Tax Guide, please contact:

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APPENDIX 1

Extract of Section 21(3), (4), (4A), (4B) and (4C) of the GST Act

Zero-rating for exports and international services

- 21. —(3)** A supply of services shall be treated as a supply of international services where the services or the supply are for the time being of any of the following descriptions:
- (e) services supplied directly in connection with land or any improvement thereto situated outside Singapore;
 - (f) services supplied directly in connection with goods situated outside Singapore when the services are performed;
 - (g) services supplied directly in connection with goods for export outside Singapore and supplied to a person who belongs in a country other than Singapore, at the time the services are performed;
 - (h) prescribed financial services supplied directly in connection with goods for export outside Singapore;
 - (j) subject to subsections (4B) and (4C), services supplied
 - (i) under a contract with a person who belongs in a country outside Singapore; and
 - (ii) which directly benefit a person who belongs in a country other than Singapore and who is outside Singapore at the time the services are performed,
 - (k) prescribed services supplied
 - (i) under a contract with a person wholly in his business capacity (and not in his private or personal capacity) and who in that capacity belongs in a country outside Singapore; and
 - (ii) which directly benefit a person wholly in his business capacity (and not in his private or personal capacity) and who in that capacity belongs in a country other than Singapore;
 - (s) services supplied
 - (i) under a contract with a person who belongs in a country outside Singapore; and

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- (ii) which directly benefit a person who belongs in a country other than Singapore,

relating to the co-location in Singapore of computer server equipment belonging to the person referred to in sub-paragraph (i) or (ii).

21. —(4) For the purposes of subsection (3) —

- (b) the services in subsection (3) (e) include —

- (i) services in the course of the construction, alteration; repair, maintenance or demolition of any building or civil engineering work; and
- (ii) services such as are supplied by estate agents and auctioneers, architects; surveyors, engineers and others involved in matters relating to land.

(4A) For the purposes of subsection (3) (j), (k) and (s), the person with whom the contract is made and the person who directly benefits from the services may be the same person or different persons.

(4B) The services referred to in subsection (3) (e), (f), (g) and (j) shall not include any services comprising either of or both —

- (a) the supply of a right to promulgate an advertisement by means of any medium of communication; and
- (b) the promulgation of an advertisement by means of any medium of communication.

(4C) The services referred to in subsection (3) (j) shall not include any services which are supplied directly in connection with —

- (a) land or any improvement thereto situated inside Singapore; or
- (b) goods situated inside Singapore at the time the services are performed, other than goods referred to in subsection (3) (g).