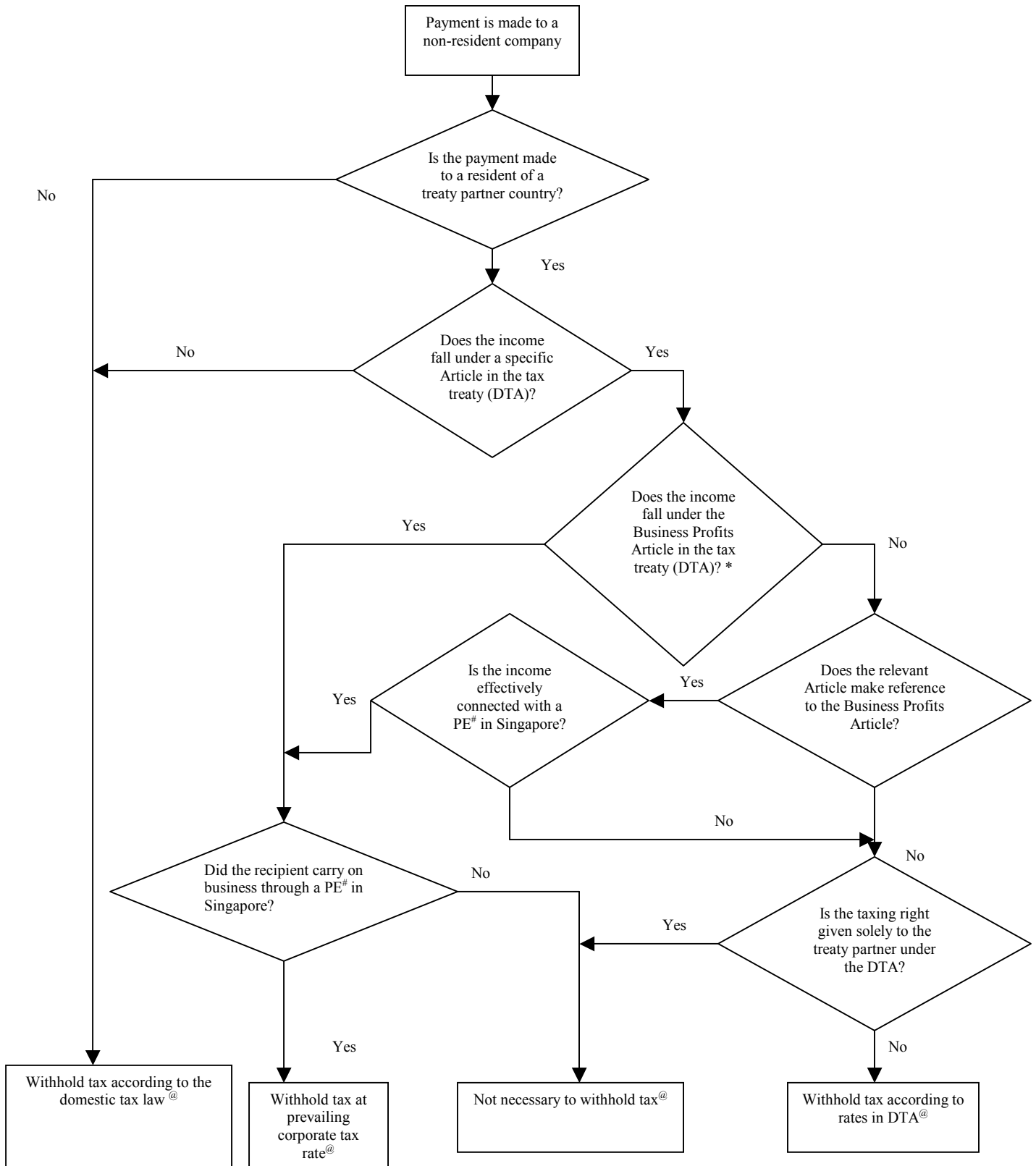


GENERAL OVERVIEW OF WITHHOLDING TAX ON INCOME DEEMED TO BE SOURCED IN SINGAPORE UNDER SECTION 12(6) AND 12(7) OF THE INCOME TAX ACT



* Examples of Business Profits Article can be found in Article 5 of Australia DTA and Article 7 of China DTA. Where payments for labour or personal services are excluded from the Business Profits Article of the DTA (Australia, Pakistan, South Korea, Sweden and Taiwan), the income will be subject to tax at the prevailing corporate tax rate regardless whether the services were provided through a PE in Singapore.

@ Please refer to “File Withholding Tax” in our IRAS website on how to report S45 withholding tax, claim for relief from Singapore income tax under the DTA and the documents to submit.

Permanent Establishment (PE) is defined for in DTAs e.g. in Article 4 of Australia DTA and Article 5 of China DTA.