

List of Qualified Tax Incentives (“QTIs”) for the purpose of the Substance-based Tax Incentive Safe Harbour, under Singapore’s Domestic Top-up Tax

Scheme (section of the Income Tax Act 1947 / other legislation)	Component qualifying for QTI	Policy intent
Corporate Volunteer Scheme (Section 14Z)	Base deduction (on expenditure that is not deductible under section 14) and enhanced deduction	The deduction is specifically allowed to encourage corporate giving and volunteerism.
Donations (Section 37(3)/(3A))	Base and enhanced deduction	These deductions are specifically allowed to promote philanthropy or to encourage overseas humanitarian giving.
Overseas Humanitarian Assistance Tax Deduction Scheme (Section 37AB)	Base deduction	
Philanthropy Tax Incentive Scheme for Family Offices (Section 37AA)	Base deduction	
Double Tax Deduction for Internationalisation (Sections 14B, 14H, 14I)	Base deduction (on expenditure that is not deductible under section 14) and enhanced deduction	The deduction is specifically allowed to support businesses in expanding overseas.
Enterprise Innovation Scheme (“EIS”): SkillsFuture-eligible training courses (Section 14ZG)	Enhanced deduction	The deduction is specifically allowed to encourage employers to invest in enterprise training and capabilities of their employees.
EIS: Artificial intelligence (“AI”) expenditure (Section 14ZK)	Base deduction (on expenditure that is not deductible under section 14) and enhanced deduction	The deduction is specifically allowed to support businesses in adopting AI.
EIS: Innovation projects with approved institutions (Section 14EA)	Base and enhanced deduction	These deductions are specifically allowed to encourage businesses to kick-start innovation or to support collaborative innovation activities.
Innovation cost-sharing agreement (Section 14EB)	Base deduction	
Green certificates or credits (Section 14ZJ)	Base deduction	The deduction is specifically allowed to support businesses in their sustainability efforts.

Scheme (section of the Income Tax Act 1947 / other legislation)	Component qualifying for QTI	Policy intent
Intellectual property (“IP”) protection (Section 14A)	Base and enhanced deduction	These deductions are specifically allowed to encourage businesses to improve existing products/ processes or develop new products/ processes through the registration or acquisition of IP.
IP rights acquisition (Section 19B)	Base and enhanced deduction	
IP licensing (Section 14U)	Enhanced deduction	The deduction is specifically allowed to encourage businesses to engage in IP-related activities and use innovation to improve their productivity and outcomes.
Investment allowance (Part 8 of the Economic Expansion Incentives (Relief from Income Tax) Act 1967)	Investment allowance used	The allowance is specifically granted to encourage businesses to invest in productive equipment that generates economic, technical or other benefits through qualifying projects.
Land Intensification Allowance (Section 18C)	Base deduction	The deduction is specifically allowed for capital expenditure with respect to qualifying industrial buildings or structures to raise land productivity among industrial users.
Mergers and Acquisitions Allowance (Section 37O)	Base deduction for 25% of the value of acquisition. Base and enhanced deduction for transaction costs.	The deduction is specifically allowed to help companies restructure, upgrade and expand through mergers and acquisitions.
Rated retail bonds (Section 14Y)	Base deduction (on expenditure that is not deductible under section 14) and enhanced deduction for qualifying upfront costs	The deduction is specifically allowed to encourage the issuance of retail bonds and broaden retail investment options.
Research and development (Sections 14C, 14D)	Base deduction (on expenditure that is not deductible under section 14) and enhanced deduction	The deduction is specifically allowed to support Singapore’s industrial development by promoting local expertise and technology.