Appendix — Summary of Singapore’s tax treaties

A summary of the tax treaties signed by Singapore can be found in the following table.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Albania</td>
<td>1.1.2012</td>
<td>Income tax</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
</tr>
<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Exempt from source country tax if paid to the Government of the other Contracting State or any other government institution thereof as may be agreed between the authorities of the two States</td>
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<td>(i) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 183 days in any 12-month period, only income that is attributable to that fixed base or activities in the other Contracting State may be</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
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<td>Article</td>
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<td>14–15</td>
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</tbody>
</table>

(ii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in the calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Country</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>1.1.2003</td>
<td>Income tax and corporation tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 5% of gross interest; Exemption of source country tax for:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where:</td>
<td>Available for Singapore tax forgiven under the Economic Expansion Incentives (Relief from Income Tax) Act and s 13(4), Income Tax Act until the year of income that commenced on 1 July 1997</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>1.1.69</td>
<td>Income tax and petroleum resource rent tax in respect of offshore projects</td>
<td>Exempt from tax in one Contracting State for air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Australian tax on dividends derived by Singapore resident limited to 15% of gross dividends; Singapore tax exemption for dividends derived by Australian resident</td>
<td>Source country tax on interest derived in one Contracting State by beneficial owner who is resident in another Contracting State limited to 10% of gross interest</td>
<td>Source country tax on royalties derived from one Contracting State by resident in the other Contracting State who is beneficially entitled to the royalties limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where:</td>
<td>Not available</td>
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</table>

**Article 21**

<table>
<thead>
<tr>
<th>Article</th>
<th>21</th>
<th>3</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11-12</th>
<th>18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria</td>
<td>1.1.2003</td>
<td>Income tax and corporation tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 10% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 5% of gross interest; Exemption of source country tax for:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where:</td>
<td>Not available</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>(i) interest paid to Government of the other Contracting State</td>
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<td>(j) in the case of independent personal services, the individual is present in the other Contracting State for 183 days or less, or has no fixed base of operation in the other Contracting State</td>
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<tr>
<td>Article</td>
<td>Effective</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>12</td>
<td>14-15</td>
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</tbody>
</table>

Exempted from source country tax if dividends paid by company resident in one Contracting State to Government of the other Contracting State.

(ii) interest paid in respect of a loan or credit made, guaranteed or insured by the Oesterreichische Kontrollbank AG or similar Singapore public entity which promote export.

Exemption of interest derived and beneficially owned by bank of one Contracting State in the other Contracting State if payer is a bank in the latter.

(i) in the case of dependent services, assignments lasting 183 days or less in any 12-month period in the calendar year, where remuneration is paid by an employer who is not a resident in the other Contracting State and where the remuneration is not borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Effective date/year of Agreement assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on personal services (in credit operations)</th>
<th>Tax on royalties</th>
<th>Tax on dividends/paying of services performed elsewhere</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bahrain</td>
<td>1.1.2005</td>
<td>Income tax</td>
<td>Profits from air transport and shipping services derived by a company resident in one Contracting State and subject to tax only in that Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
</tr>
</tbody>
</table>

In the case of profits derived from independent services if performed in one Contracting State by a resident of the other Contracting State, if the services are performed regularly in one Contracting State for the purpose of performing such services in the other Contracting State, the individual having the personal services performed shall be entitled to the benefits of the agreement in the Contracting State from which such services are regularly performed, provided that his income is not taxed in the other Contracting State unless attributable to the services performed in that other Contracting State.

Subject to tax only in one Contracting State:

(i) Exempt from source country tax if paid to the Government of the other Contracting State in the case of profits from international air transport and shipping services, if the services are performed regularly in one Contracting State for the purpose of performing such services in the other Contracting State, if the individual having the personal services performed shall be entitled to the benefits of the agreement in the Contracting State from which such services are regularly performed, provided that his income is not taxed in the other Contracting State unless attributable to the services performed in that other Contracting State.
<table>
<thead>
<tr>
<th>Effective date/year of agreement assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
</table>

(ii) In the case of independent services, if the individual's stay in the other Contracting State exceeds 183 days in any calendar year, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State, and...
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(iii)</td>
<td>in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>2</td>
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<td>14–15</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Bahrain (Air transport treaty)</td>
<td>1.1.71</td>
<td>Tax on income and profits</td>
<td>Exempt from tax in one Contracting State for international air transport operations of enterprise carried on by a resident of the other Contracting State</td>
<td>No specific provision</td>
<td>Exempt from tax in one Contracting State for interest derived from bank deposits connected with international air transport operations carried on by a resident of the other Contracting State</td>
<td>No specific provision</td>
<td>Income derived in respect of employment exercised aboard an aircraft operated in international traffic shall be taxable only in state of residence of enterprise</td>
<td>No specific provision</td>
</tr>
<tr>
<td>Bangladesh</td>
<td>1.1.80</td>
<td>Income tax and super tax</td>
<td>Exempt from tax in one Contracting State for air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 15% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 10% of gross interest</td>
<td>Source country tax on royalties derived from one Contracting State by beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore and Bangladesh tax forgone on dividends, interest and royalties under laws designed to promote economic development in Singapore and Bangladesh respectively</td>
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<tr>
<td>Article</td>
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<tr>
<td>Article</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<td>Tax on shipping and airline operations</td>
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<tr>
<td>Barbados</td>
<td>1.1.15</td>
<td>Income tax in Singapore, income tax, corporation tax and petroleum winning operations tax in Barbados</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in Barbados</td>
<td>Exempt from source country tax if paid by a company resident in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 12% of gross interest. Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 8% of gross royalties</td>
<td>Source country tax on royalties derived from one Contracting State by beneficial owner who is resident in the other Contracting State</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
<td>No specific provision</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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</tbody>
</table>

(i) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(ii)</td>
<td>in the case of independent services, if the individual is present in the other Contracting State for a period or periods exceeding in the aggregate 365 days in any 15-month period, only so much of the income as is derived from the activities performed by that individual in that other Contracting State may be taxed in that other Contracting State.</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment in Singapore</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<td>12</td>
<td>14-15</td>
<td>(iii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in the calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Belarus</td>
<td>1.1.2014</td>
<td>Income tax in Singapore; income and profits tax in Belarus</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross dividends if the beneficial owner is a resident of the other Contracting State Exempt from source country tax if paid to the Government of the other Contracting State or any other government institution thereof</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
<td>No specific provision</td>
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</table>

(i) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State.
<table>
<thead>
<tr>
<th>Agreement assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tr>
<td>(ii) in the case of independent services, if the individual is present in the other Contracting State for a period or periods exceeding in the aggregate 270 days in any 12-month period, only so much of the income as is derived from the activities performed by that individual in that other Contracting State may be taxed in that other Contracting State.</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Belgium (2008)</td>
<td>1.1.2009</td>
<td>Income tax in Singapore, individual income tax, corporate income tax, income tax on legal entities and non-residents, prepayments and surcharges on any of the above taxes in Belgium</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Tax on royalties</td>
<td>Tax on personal services</td>
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</tbody>
</table>
| (i)       | 5% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends | Exempt from source country tax if paid by a banking enterprise of the other Contracting State | (i) 5% of gross royalties paid for the use of, or the right to use, any copyright of literary, artistic or scientific work including computer software, cinematograph films, and films or tapes for radio or television broadcasting, any patent, trade mark, design or model, plan, secret formula or process, or for information concerning industrial, commercial or scientific experience, and (j) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State, or
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<tr>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(ii) 15% of gross dividends in all other cases</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>(i) 5% of the adjusted royalties (adjusted royalties being 60% of gross royalties) paid for the use of, or the right to use, any industrial, commercial or scientific equipment</td>
<td>(i) in the case of independent services, if the individual’s stay in the other Contracting State exceeds 183 days in any 12-month period, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<td>Exempt from source country tax if the beneficial owner is a company that is a resident of the other Contracting State and holds directly at least 25% of the capital of the company paying the dividends for a continuous 12-month period.</td>
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<td>Article 28</td>
<td>28</td>
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<td>8</td>
<td>10</td>
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<td>14–15</td>
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<tr>
<td>Exempt from Belgian tax if paid by a company that is resident in Belgium to the Government of Singapore.</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Tax on royalties</td>
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<tr>
<td>Belgium (1973)</td>
<td>1.1.73 (supplementary agreement YA 1991)</td>
<td>Individual income tax, corporate income tax, income tax on legal entities and non-residents, prepayments and additional prepayments, and surcharges on any of the above taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 15% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 10% of gross interest (supplementary agreement)</td>
<td>Royalties arising in one Contracting State and paid to resident in the other Contracting State may be taxed in that other State limited to 5% of gross royalties (supplementary agreement)</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
</tr>
<tr>
<td>Article</td>
<td>28</td>
<td>2</td>
<td>8</td>
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<td>11</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<tr>
<td>Brazil (shipping and aircraft operations treaty)</td>
<td>1.1.2014</td>
<td>Income tax in Singapore; corporate income tax in Brazil</td>
<td>Exempt from tax in one Contracting State for international air or shipping transport operations by an enterprise in the other Contracting State</td>
<td>No specific provisions on these matters as this treaty is restricted to mutual tax exemption of income from international shipping and aircraft operations</td>
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<td>Article 6</td>
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<tr>
<td>Brunei</td>
<td>1.1.2007</td>
<td>Income tax and petroleum profits tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to:</td>
<td>Source country tax on royalties derived from one Contracting State by beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available for Singapore and Brunei tax forgone under laws designed to promote economic development in Singapore and Brunei respectively</td>
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<td></td>
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<td>(i) 5% of gross interest if received by bank or financial institution, and</td>
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<td>(ii) in the case of independent services, persons without a fixed base of operation or stays for a period or periods less than 183 days in any 12-month period</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
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</table>

(ii) 10% in all other cases

(iii) [Text cut off]
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bulgaria</td>
<td>1.1.98</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 5% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends; Exempted from source country tax if dividends paid by company resident in one Contracting State to Government of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 5% of gross interest</td>
<td>Exemption of source country tax for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for: (i) in the case of independent services, persons without fixed base of operation (ii) in the case of dependent services, assignments lasting 183 days or less</td>
<td>Not available</td>
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</table>

Article 29 2 8 10 11 12 14±15
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cambodia</td>
<td>1.1.2018</td>
<td>Income tax in Singapore; Tax on Profit including Withholding Tax, Additional Profit Tax on Dividend Distribution and Capital Gains Tax and Tax on Salary in Cambodia</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of aircraft in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 10% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest, except for exemption for interest paid to the Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Not available</td>
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</table>

(i) in the case of independent services, persons with a fixed base of operation or who stay at least 183 days in any 12-month period.
<table>
<thead>
<tr>
<th>Effective date/year of Agreement assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax on personal shipping relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>(ii) in the case of dependent services, persons whose presence exceeds 183 days within any 12-month period and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Canada</td>
<td>1.1.77</td>
<td>Income taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 15% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident of another Contracting State limited to 15% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
</tr>
<tr>
<td>Chile (Shipping operations treaty)</td>
<td>26.11.93</td>
<td>Income taxes</td>
<td>Exempt from tax in one Contracting State for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td></td>
<td>No specific provisions on these matters as this treaty is restricted to mutual tax exemption of income from international shipping operations</td>
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<tr>
<td>China (People's Republic) (2007 amended by 2009 Protocol)</td>
<td>1.1.2008</td>
<td>Individual income tax, enterprise income tax, and income tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>China tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Tax on personal services</td>
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<td>(i) 5% of gross dividends if the beneficial owner is a company (other than a partnership) that holds directly at least 25% of the capital of the company paying the dividends</td>
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<td>(i) 7% of gross interest if received by a bank or financial institution, or</td>
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<td>(j) in the case of independent services, he/she has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities. In that case, only so much of the income as is attributable to that fixed base may be taxed in that other Contracting State, or</td>
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<tr>
<td>Agreement (in Singapore)</td>
<td>Effective date/year of assessment</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Article 28</td>
<td>1.1.87</td>
<td>China (People's Republic) (1986) (terminated)</td>
<td>Individual income tax, income tax for enterprises with foreign investment and foreign enterprises, and local income tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>China tax limited to 12% of gross dividends if recipient is a Singapore resident and a beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
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</table>

Except for exemption for interest paid to the Government of either Contracting State and certain banks.
<table>
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<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Cyprus</td>
<td>1.1.2003</td>
<td>Income tax, corporate income tax, capital gains tax, and special contribution for the defence of Cyprus</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Dividends exempt from source country tax if paid by company resident in one Contracting State to a resident of the other Contracting State who is the beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Not available</td>
</tr>
<tr>
<td>Article</td>
<td>29</td>
<td>2</td>
<td>8</td>
<td>10</td>
<td>(i) 7% of gross dividends if recipient is a company or partnership resident in Singapore which holds at least 25% of China company’s capital; or</td>
<td>(ii) 10% of gross interest in all other cases, except for exemption for interest paid to Government of either Contracting State</td>
<td>(i) in the case of independent services, persons without fixed base of operation;</td>
<td>(ii) in the case of dependent services, assignments lasting 183 days or less</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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</tbody>
</table>

(i) 7% of gross interest if received by a bank or financial institution, or

(ii) in the case of independent services, persons without fixed base of operation and stay for periods (in aggregate) for less than 90 days within a 12-month period.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Article</td>
<td>27 2 8 10</td>
<td></td>
<td></td>
<td>(ii) 10% of gross interest in all other cases, except for exemption for interest paid to Government of either Contracting State</td>
<td>11 12 14−15</td>
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</tbody>
</table>

(ii) in the case of dependent services, assignments lasting 183 days or less where remuneration is not paid by an employer which is a resident in the latter Contracting State and when the remuneration is not borne by a PE or fixed base in the latter Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech Republic (amended by 2014 Protocol)</td>
<td>1.1.99 (1.1.2015 for 2014 Protocol)</td>
<td>Tax on income of individuals and legal persons</td>
<td>Up to 31 December 2014: Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State. From 1 January 2015: taxable only in the Contracting State in which the effective place of management of the enterprise is situated.</td>
<td>Source country tax limited to 5% of gross dividends if resident of the other Contracting State and is paid to beneficial owner of the dividends.</td>
<td>Exempt from source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State.</td>
<td>Up to 31 December 2014: Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 70% of gross royalties. From 1 January 2015, source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State.</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Not available</td>
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</tbody>
</table>

The table above provides details on the tax treatment of shipping, airline operations, dividends, interest, royalties, and personal services for the Czech Republic, specifically for the year 2014 and beyond, as of the effective date.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
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<td></td>
<td></td>
<td></td>
<td>(i) 5% of gross royalties paid as consideration for the use of, or the right to use industrial, commercial or scientific equipment</td>
<td>(i) in the case of dependent services, if all the following conditions are fulfilled: assignments last 183 days or less, remuneration is paid by, or on behalf of, an employer who is not resident in the other State, and remuneration is not borne by a permanent establishment or a fixed base which the employer has in the other State</td>
</tr>
<tr>
<td>Article</td>
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<td>27</td>
<td>Denmark (2000)</td>
<td>State income tax, municipal income tax, income tax to county municipalities and hydrocarbon taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident in the other Contracting State, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Not available</td>
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<tr>
<td>2</td>
<td>1.1.2002</td>
<td>Exempt</td>
<td>8</td>
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<td>14-15</td>
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<tr>
<td>8</td>
<td>10% of gross royalties paid as consideration for the use of, or the right to use any patent, trade mark, design or model, plan, secret formula or process and computer software, or for information concerning industrial, commercial or scientific experience</td>
<td>(i) Exempt</td>
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</tbody>
</table>

**Appendix**

**Chapter 22**

**Singapore Master Tax Guide Handbook**
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
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<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tr>
<td></td>
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<td>(i) 0% of gross dividends if the beneficial owner holds directly at least 25% of the capital of the company</td>
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<td>j) in the case of independent services, persons without fixed base of operation or stays for less than 90 days in any 12-month period in the calendar year</td>
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<td>(ii) 5% of gross dividends if the beneficial owner is a pension fund or other similar institution providing pension schemes where individuals may participate in order to secure retirement benefits, and</td>
<td></td>
<td>j) in the case of dependent services, assignments lasting 183 days or less in any 12-month period in the calendar year and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<tr>
<td>Denmark (1986) (terminated)</td>
<td>1.1.84</td>
<td>State income tax, municipal income tax, income tax to county municipalities, special income tax, church tax, dividends tax, interest tax, royalties tax, and hydrocarbon taxes</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>(iii) 10% of gross dividends in all other cases</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner resident in the other Contracting State, source country tax limited to 15% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 15% of gross royalties if such royalties are received for the use of, or the right to use, any patent, trade mark, design or model, plan, secret formula or process, or for the use of, or the right to use, industrial or scientific equipment, or for information concerning industrial or scientific experience</td>
<td>Available for Singapore tax forgone under Income Tax Act and Economic Expansion Incentives (Relief from Income Tax) Act</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<tr>
<td>Ecuador</td>
<td>1.1.2016</td>
<td>Income tax</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for</td>
<td>Not available</td>
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</table>

(i) 5% of gross dividends if recipient is a beneficial owner which is a company holding at least 25% of dividend-paying company’s capital,

(ii) 10% of gross dividends in all other cases.
<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment in Singapore</th>
<th>Foreign taxes allowed as a credit</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>28</td>
<td></td>
<td></td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(i) in the case of independent services, persons with a fixed base of operation or who stay at least 183 days in any 12-month period</td>
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<td>(ii) in the case of dependent services, persons whose presence exceeds 183 days in any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
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<tr>
<td>Egypt</td>
<td>1.1.2005</td>
<td>Tax on income derived from immovable property (including the land tax and building tax), the unified tax on income of individuals levied by the law No 157 for the year 1981 and amended by the law No 187 for the year 1993, corporation profits tax, development duty imposed by the law No 147 for the year 1984 and its amendments, supplementary taxes imposed as percentage of taxes mentioned above</td>
<td>Income from international air transport and shipping operations subject to tax in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax limited to 15% of gross dividends if resident of the other Contracting State is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 15% of the gross amount of the interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of the gross amount of royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for Singapore grants tax sparing credit for Egyptian tax on royalties</td>
<td>Singapore grants tax sparing credit for Egyptian tax on royalties except for the first 10 years after the Agreement is in effect</td>
</tr>
<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Article 29</td>
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<td>23</td>
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</tr>
</tbody>
</table>

(i) in the case of independent services, persons without a fixed base of operation or stays for a period or periods less than 183 days in the calendar year concerned

(ii) in the case of dependent services, assignments lasting 183 days or less in any 12-month period in the calendar year and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estonia</td>
<td>1.1.2008</td>
<td>Income tax</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
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<tr>
<td></td>
<td></td>
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<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 25% of the capital of the company paying the dividends</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td></td>
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<td>(j) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State</td>
<td></td>
</tr>
<tr>
<td>Effective date/year of Agreement</td>
<td>Foreign taxes on shipping and air carriage operations</td>
<td>Tax on shipping and air carriage operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Agreement assessment allowed as a credit</td>
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<td>(i) 10% of gross dividends in all other days</td>
<td>in the case of individual's presence in the Contracting State not exceeding 183 days in any 12-month period</td>
<td>if the individual is a resident of the Contracting State and the remuneration is borne by an enterprise of which he is a member</td>
<td>in the case of individual's presence in the Contracting State not exceeding 183 days in any 12-month period</td>
<td>if the individual is a resident of the Contracting State and the remuneration is borne by an enterprise of which he is a member</td>
<td>in the case of individual's presence in the Contracting State not exceeding 183 days in any 12-month period</td>
<td>if the individual is a resident of the Contracting State and the remuneration is borne by an enterprise of which he is a member</td>
<td>in the case of individual's presence in the Contracting State not exceeding 183 days in any 12-month period</td>
<td>if the individual is a resident of the Contracting State and the remuneration is borne by an enterprise of which he is a member</td>
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<tr>
<td>Ethiopia</td>
<td>1.1.2018</td>
<td>Income tax in Singapore, tax on income and profit, tax on income from mining, petroleum and agricultural activities in Ethiopia</td>
<td>Profits from the operation of ships or aircraft in international traffic shall be taxable only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Available for tax forgone on exempted or concessionary income derived by residents of both Contracting States</td>
<td></td>
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</tbody>
</table>

Explanation:
- **Exempt from source country tax if paid to the Government of the other Contracting State in respect of shares in joint stock companies.
- **Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:
  1. in the case of independent services, persons with a fixed base of operation or who stay at least 183 days in any 12-month period.
<table>
<thead>
<tr>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Article 27</td>
<td>27</td>
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<td>14-15</td>
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</tbody>
</table>

(ii) in the case of dependent services, persons whose presence exceeds 183 days within any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/ fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
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<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Fiji</td>
<td>1.1.2007</td>
<td>Income tax and land sales tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of an enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in another Contracting State limited to 10% of gross interest; except for exemption for interest paid to the Government of either Contracting State</td>
<td>Source country tax on royalties derived from one Contracting State by a beneficial owner who is resident in the other Contracting State subject to tax in the latter except for: (i) in the case of independent services, persons without a fixed base of operation or staying for a period or periods less than 120 days in any 12-month period. Otherwise, limited to 10% of gross royalties. Available for Singapore and Fiji tax forgone under laws designed to promote economic development in Singapore and Fiji respectively.</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<td>Finland (2002)</td>
<td>1.1.2003</td>
<td>State income taxes, corporate income tax, communal tax, church tax, tax withheld at source from interest and tax withheld at source from resident’s income</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident in the other Contracting State, source country tax limited to 10% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 5% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for</td>
<td>Not available</td>
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</table>

In the case of dependent services, assignments lasting 183 days or less in any 12-month period and the remuneration is not borne by a resident of the other Contracting State or a permanent establishment/ fixed base of the employer in the other Contracting State.
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
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<td>(i) 5% of gross dividends if the beneficial owner controls directly at least 10% of the voting power of the company (other than a partnership), and</td>
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<td>(j) in the case of independent services, persons without fixed base of operation or stays for less than 183 days in any 12-month period in the calendar year, and</td>
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<td>Agreement assessment (in Singapore)</td>
<td>Effective date/year of Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>(i) 10% of gross dividends in all other cases</td>
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<td>(i) in the case of dependent services, assignments lasting 183 days or less in any 12-month period in the calendar year and the remuneration is not borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
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<td>Notwithstanding the above, if an individual resident in Finland is under Finnish tax law entitled to a tax credit in respect of dividends paid by a company resident in Finland, dividends paid by a company resident in Finland to a resident of Singapore is taxable only in Singapore if the beneficial owner of the dividends is a resident in Singapore. Exemption in one Contracting State for dividends paid by company resident in that Contracting State to the Government of the other Contracting State.</td>
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<tr>
<td>Agreement (In Singapore)</td>
<td>Effective date/year of assessment</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Tax on royalties</td>
<td>Tax on personal services</td>
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<tr>
<td>France (2016)</td>
<td>1.1.2017</td>
<td>Income tax in Singapore; income tax, corporation tax, contributions on corporation tax, and widespread social security contributions and contributions for the reimbursement of the social debt in France</td>
<td>Taxable only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Exempt from source country tax if certain conditions are met</td>
<td>Exempt from source country tax if royalty arises in one Contracting State and is paid to beneficial owner who is resident in the other Contracting State</td>
<td>Employment income derived by an individual resident in one Contracting State from the other Contracting State subject to tax only in the former except for persons whose presence exceeds 183 days in any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
<td>Not available</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>France (1975) (terminated)</td>
<td>1.1.72</td>
<td>Income tax and corporation tax, including any withholding tax, prepayment or advance payment in respect of the above taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Exempt from tax in one Contracting State for dividends paid by company resident in Singapore, French tax limited to 15% of the dividends if recipient is the beneficial owner of the dividends, but limited to 10% of gross dividends if recipient is a beneficial owner which is a company holding at least 10% of French company’s capital</td>
<td>Source country tax on interest arising in one Contracting State and paid to a resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest arising in one Contracting State and paid to Government of the other Contracting State, or</td>
<td>Royalties arising in one Contracting State and paid to resident of the other Contracting State, except for royalties received for the use of, or the right to use, any copyright of literary or artistic work, including cinematographic films and tapes for television or broadcasting or for information concerning commercial experience, are exempt from source country tax</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for dividends paid out of income exempted from Singapore tax under the Economic Expansion Incentives (Relief from Income Tax) Act or tax forgone on interest and royalties under the tax treaty</td>
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<td></td>
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<td>(ii) 15% of gross dividends in all other cases</td>
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<td>0</td>
<td>11</td>
<td>12</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
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<tr>
<td>Article</td>
<td>30</td>
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<td>10</td>
<td>12</td>
<td>13</td>
<td>15</td>
<td>24</td>
</tr>
<tr>
<td>Georgia</td>
<td>1.1.2011</td>
<td>Income tax in Singapore; profit tax and income tax in Georgia</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Exempt from source country tax</td>
<td>Exempt from source country tax</td>
<td>Exempt from source country tax</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
</tr>
</tbody>
</table>

(ii) paid on debentures issued by, or on loans made to, an enterprise resident in the other Contracting State which is engaged in an industrial undertaking.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i)</td>
<td>in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State</td>
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<tr>
<td>Effective date/year of agreement (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>Article 28</td>
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<td>14–15</td>
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</table>

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</thead>
<tbody>
<tr>
<td>(i) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in the calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.</td>
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<td>Agreement</td>
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<tr>
<td>Germany (2006)</td>
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<tr>
<td>Effective date/year of assessment (in Singapore)</td>
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<tr>
<td>Agreement</td>
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<td>Article</td>
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<tr>
<td>1.1.69</td>
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<tr>
<td>Agreement</td>
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<tr>
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<tr>
<td>Guernsey</td>
</tr>
</tbody>
</table>

(i) 10% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or
(ii) 15% of gross dividends in all other cases
<table>
<thead>
<tr>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td></td>
<td>in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities; only income that is attributable to that fixed base may be taxed in that other Contracting State</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
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</tr>
<tr>
<td>(ii)</td>
<td>in the case of independent services, if the individual is present in the other Contracting State for a period or periods exceeding in the aggregate 365 days in any 15-month period, only so much of the income as is derived from the activities performed by that individual in that other Contracting State may be taxed in that other Contracting State</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
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</tbody>
</table>

(iii) In the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hong Kong (Shipping and aircraft operations treaty)</td>
<td>1.1.2005</td>
<td>Income tax, salaries tax and profit tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations by an enterprise managed and controlled in the other Contracting State</td>
<td>No specific provision</td>
<td>No specific provision</td>
<td>No specific provision</td>
<td>Income derived from employment exercised aboard an aircraft operated in international traffic shall be taxable only in the State where the air transport enterprise is managed and controlled</td>
<td>No specific provision</td>
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<td>Article 5</td>
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<tr>
<td>Hungary</td>
<td>1.1.99</td>
<td>Income tax on individuals and corporation tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to 5% of gross interest. Exempt for interest paid to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for: Available for Singapore tax reduced or exempted under tax incentives for the promotion of economic development in Singapore</td>
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<td>(i) 5% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or (j) Government of other Contracting State, or</td>
<td>(i) Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 5% of gross interest. Exempt for interest paid to:</td>
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<tr>
<td>Effective date/year of</td>
<td>Foreign taxes</td>
<td>Tax on shipping</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Agreement (in Singapore)</td>
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<td>Article 29</td>
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<td>12</td>
<td>14-15</td>
<td>24</td>
<td></td>
</tr>
</tbody>
</table>

(ii) 10% of gross dividends in all other cases

(iii) bank by a bank of the other Contracting State

(iv) in the case of dependent services, assignments lasting 183 days or less over a 12-month period and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>India (1994)</td>
<td>1.1.94</td>
<td>Income tax and surcharge thereon</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is a resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties and technical fees arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross amount of royalties and technical fees (Protocol signed on 29 June 2010)</td>
<td>Tax for services performed in the other Contracting State:</td>
<td>Available for Singapore tax and Indian tax forgone under the Economic Expansion Incentives (Relief from Income Tax Act and certain provisions of the Income Tax Act and India’s laws respectively)</td>
</tr>
</tbody>
</table>

(i) 10% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or

(ii) 10% of gross interest if interest paid on loan granted by bank carrying on bona fide banking business or by a similar financial institution (including insurance company)
<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Indonesia</td>
<td>1.1.92</td>
<td>Income tax, company tax, tax on interest, dividends and royalties</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>(i) 15% of gross dividends in all other cases</td>
<td>(ii) 15% in all other cases</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross royalties</td>
<td>(i) In the case of dependent services, assignments lasting 183 days or less</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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</tr>
<tr>
<td>Article 28</td>
<td>2011</td>
<td>Income tax in Singapore; income tax, income levy, corporation tax and capital gains tax in Ireland</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Exempt from source country tax</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for tax forgone on exempted income derived by residents of both Contracting States</td>
</tr>
<tr>
<td>Ireland 1.1.2011</td>
<td></td>
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<td></td>
<td>(i) 15% of gross dividends in all other cases</td>
<td>(ii) in the case of dependent services, assignments last 183 days or less</td>
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</tbody>
</table>

Note: The table lists the treaty provisions for tax on shipping and airline operations, tax on dividends, tax on interest, tax on royalties, and tax on personal services, along with the effective date and assessment year for each provision.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State or any other government institution thereof as may be agreed between the authorities of the two States</td>
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<td></td>
<td>§ in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 183 days in any 12-month period, only income that is attributable to that fixed base or activities in the other State</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>(ii) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in the calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
<td>28</td>
<td>2</td>
<td>8</td>
<td>10</td>
<td>11</td>
<td>12</td>
<td>14–15</td>
<td>23</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Isle of Man</td>
<td>1.1.2014</td>
<td>Income tax in Singapore; taxes on income or profit in the Isle of Man</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Exempt from source country tax</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 12% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in another Contracting State subject to tax only in the former, except: Available for tax forgone on exempted income derived by residents of the Isle of Man</td>
<td></td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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</table>

- Exempt from source country tax if paid to the Government of the other Contracting State.

- In the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 183 days in any 12-month period, only income that is attributable to that fixed base or activities in the other.
<table>
<thead>
<tr>
<th>Agreement date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
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<tbody>
<tr>
<td>Article 27</td>
<td>2</td>
<td>8</td>
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<td>12</td>
<td>14, 15</td>
<td>22</td>
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</tbody>
</table>

Contracting State may be taxed in that other Contracting State:

(ii) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
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<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Israel (2005)</td>
<td>1.1.2006</td>
<td>Income tax in Singapore, income tax and company tax (including tax on capital gains), and tax imposed upon gains from the alienation of real property in Israel</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7% of the gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Available for Israeli tax forgone under the special incentive laws designed to promote economic development in Israel</td>
</tr>
</tbody>
</table>

(i) 5% of the gross dividends if the beneficial owner holds directly at least 10% of the capital of the company paying the dividends. Exempt from source country tax if the interest is paid to the Government of the other Contracting State.

(ii) Royalties arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other State, but the tax so charged in the other Contracting State shall not exceed 20% of the amount of such royalties.

(iii) in the case of independent service providers, persons with a fixed base of operation or who stay at least 183 days in any calendar year.
<table>
<thead>
<tr>
<th>Effective date/year of Agreement assessment allowed as a credit</th>
<th>Tax on shipping and ancillary operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
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<td>Article 27</td>
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<td>24-55</td>
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</tbody>
</table>

In the case of dividends paid in the nature of wages, salaries, or in the nature of remuneration in respect of services furnished by a permanent establishment or fixed base in another Contracting State, the percentage of 10% of the gross amount of the dividends applies only if the period of stay is 183 days or less in a calendar year and the remuneration is not borne by a permanent establishment or fixed base in the other Contracting State.
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Israel (1972) (terminated)</td>
<td>1.1.72</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is subject to tax in that other Contracting State, dividends are exempt from tax in first Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a resident in the other Contracting State limited to 15% of gross interest</td>
<td>Royalties arising in one Contracting State and paid to resident in the other Contracting State exempt from source country tax</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore and Israeli tax forgone under the special incentive laws designed to promote economic development in Singapore and Israel respectively</td>
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<td>Article</td>
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<td>Italy</td>
<td>1.1.75</td>
<td>Income tax in Singapore; personal and corporate income taxes, and regional tax on productive activities in Italy</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is the beneficial owner of the dividends, source country tax limited to 10% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 12.5% of gross interest except for exemption in respect of interest paid on loans arising from agreements concluded between the Governments of the Contracting States</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore and Italy tax on dividends, interest and royalties exempted or reduced under Singapore or Italy laws respectively</td>
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<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>(i)</td>
<td>15% of gross royalties if received for the use of, or the right to use, any copyright of scientific work, any patent, trademark, design or model, plan, secret formula or process or for any industrial, commercial or scientific equipment or for information concerning commercial or scientific experience</td>
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<td>(ii)</td>
<td>20% of gross royalties if received for the use of, or the right to use any copyright of literary or artistic work including cinematographic films or tapes for television or broadcasting</td>
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<td>Foreign taxes allowed as a credit</td>
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<td>Japan (1995)</td>
<td>1.1.96</td>
<td>Income tax, corporation tax and local inhabitant taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore tax forgone under the special incentive measures designed to promote economic growth in Singapore only from 14.1.81 to 31.12.95</td>
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<tr>
<td>Article 29</td>
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<td>(i) 5% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or</td>
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<td>(ii) 15% of gross dividends in all other cases</td>
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<td>Jersey</td>
<td>1.1.2014</td>
<td>Income tax</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Exempt from source country tax</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 12% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
<td>Not available</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 365 days in any 15-month period, only income that is attributable to that fixed base or activities in the other</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Article 27</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Kazakhstan</td>
<td>1.1.2008</td>
<td>Income tax and corporation tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to (a) 5% of gross dividends if the beneficial owner is a company that directly holds at least 25% of the capital of the company paying the dividends, and (b) 10% of the gross amount of the dividends in all other cases</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of another Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Not available</td>
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</table>

**Article** 27 2 8 10 11 12 14
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Korea</td>
<td>1.1.79</td>
<td>Income tax, corporation tax and inhabitant tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 15% of gross royalties; this also applies to proceeds from the alienation of any copyright of scientific work, any patent, trade mark, design or model, plan, or secret formula or process</td>
<td>Available for Singapore and Korean tax on dividends and royalties excepted or reduced under the special incentive laws designed to promote economic development in Singapore and Korea respectively</td>
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</table>

(i) 10% of gross dividends if recipient is company holding at least 25% of dividend-paying company's capital, or
<table>
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<tr>
<th>Article</th>
<th>26</th>
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<tr>
<td><strong>Kuwait</strong></td>
<td>1.1.2004</td>
<td>Corporate income tax, contribution from the net profits of Kuwaiti shareholding companies payable to the Kuwait Foundation for Advancement of Science (KFAS) and the Zakat Fund incentive measures for a specified period of time</td>
<td>Exempt from tax in one Contracting State for international shipping and air transport operations carried on by a resident of the other Contracting State</td>
<td>15% of gross dividends in all other cases</td>
<td>Dividends arising in a Contracting State and paid to a resident of the other Contracting State shall be taxable only in that other Contracting State if such resident is the beneficial owner of the dividends.</td>
<td>Source country tax on interest arising in one Contracting State is limited to 7% of the gross amount of interest if the beneficial owner of the interest is a resident of the other Contracting State.</td>
<td>Source country tax on royalties arising in one Contracting State is limited to 10% of the gross amount of royalties if the beneficial owner of the royalties is a resident of the other Contracting State.</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
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Where the beneficial owner of such interest is the Government of the other Contracting State, the interest will be exempt from tax.

(i) in the case of independent services, persons without fixed base of operation or assignments lasting 183 days or less in a 12-month period.
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Article  29</td>
<td>2</td>
<td>8</td>
<td>10, 23, &amp; Protocol</td>
<td>11</td>
<td>12</td>
<td>14-15</td>
<td>23</td>
<td>(i) in the case of dependent services assignments lasting 183 days or less in the calendar year, the remuneration is paid by an employee who is a resident of the other Contracting State and the remuneration is not borne by a permanent establishment or fixed base of the employer in the other Contracting State.</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
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<tr>
<td>Laos</td>
<td>1.1.2017</td>
<td>Profits of an enterprise of a Contracting State from the operation of ships, aircraft or vehicles in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross royalties</td>
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<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Not available</td>
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<td>(i) 5% of gross dividends if the beneficial owner is a company which owns directly or indirectly at least 10% of the share capital of the company paying the dividends</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(ii) in the case of independent services, persons with a fixed base of operation or who stay at least 300 days in any 12-month period</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<tr>
<td>Latvia</td>
<td>1.1.2002</td>
<td>Enterprise income tax and personal income tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross interest;</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties;</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for</td>
<td>Not available</td>
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(ii) 8% of gross dividends in all other cases.
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<tr>
<th>Agreement Date/Year of Assessment (in Singapore)</th>
<th>Foreign Taxes Allowed as a Credit</th>
<th>Tax on Shipping and Airliner Operations</th>
<th>Tax on Dividends</th>
<th>Tax on Interest</th>
<th>Tax on Royalties</th>
<th>Tax on Personal Services</th>
<th>Tax sparing relief</th>
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<td></td>
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<td>(i) 5% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or</td>
<td>Exempt for interest paid to Government of either Contracting State</td>
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<td>(i) in the case of independent services, persons without fixed base of operation or stays for less than 183 days in any 12-month period</td>
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<td>(ii) 10% of gross dividends in all other cases</td>
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<td>(ii) in the case of dependent services, assignments lasting 183 days or less in a 12-month period and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<td>Libya</td>
<td>1.1.2011</td>
<td>Income tax in Singapore; income tax, defence tax and real estate tax on income in Libya</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
</tr>
</tbody>
</table>

Notes:
(i) Exempt from tax if recipient is the Government of a Contracting State where the dividends are paid to a beneficial owner who is a resident in the other Contracting State.
(ii) Subject to tax only in the Beneficial State from personal services performed in the other Contracting State.
<table>
<thead>
<tr>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State or any other government institution thereof as may be agreed between the authorities of the two States</td>
<td>() in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 183 days in any 12-month period, only income that is attributable to that fixed base or activities in the other State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<td>Article 29</td>
<td>2009</td>
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<td>9</td>
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<td>13</td>
<td>15–16</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<tr>
<td>Liechtenstein</td>
<td>1.1.15</td>
<td>Income tax in Singapore; personal income tax, corporate income tax, corporation taxes, real estate capital gains tax, wealth tax and coupon tax in Liechtenstein</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Exempt from source country tax if paid by a company resident in one Contracting State to a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 12% of gross interest</td>
<td>Source country tax on royalties derived from one Contracting State by beneficial owner who is resident in the other Contracting State, limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
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</table>

- (i) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities; only income that is attributable to that fixed base may be taxed in that other Contracting State.
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<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
</table>

(ii) in the case of independent services, if the individual is present in the other Contracting State for a period or periods exceeding in the aggregate 365 days in any 15-month period, only so much of the income as is derived from the activities performed by that individual in that other Contracting State may be taxed in that other Contracting State.
<table>
<thead>
<tr>
<th>Effective date/year</th>
<th>Foreign taxes</th>
<th>Tax on shipping</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax on personal services (in credit operations)</th>
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<tbody>
<tr>
<td>(i)</td>
<td>in the case of the individual's presence in the Contracting State for more than 183 days in any 12-month period where remuneration is paid by an employer resident in the other Contracting State</td>
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Article 27 28 10 11 12 14±15
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<tr>
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<th>Effective date/year of assessment (in Singapore)</th>
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<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lithuania</td>
<td>1.1.2005</td>
<td>Income tax in Singapore, tax on profits of legal persons and tax on income of natural persons in Lithuania</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest.</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State, subject to tax only in the former except where:</td>
<td>Not available</td>
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<tr>
<td>Lithuania</td>
<td>1.1.2005</td>
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</table>

(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 25% of the capital of the company paying the dividends

Exempt from source country tax if interest paid to the Government of the other Contracting State

(j) in the case of independent services, the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, in that case, only income that is attributable to that fixed base may be taxed in that other Contracting State, or
<table>
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<tr>
<th>Agreement assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>(ii) 10% of gross dividends in all other cases</td>
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<td></td>
<td>(i) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>Luxembourg (2015)</td>
<td>1.1.2016</td>
<td>Income tax in Singapore; income tax on individuals, corporation tax, capital tax and communal trade tax in Luxembourg</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Exempt from source country tax if paid to a resident of the other Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7% of gross royalties</td>
<td>Not available</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
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</table>
## Effective date/year of assessment (in Singapore)

<table>
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<tr>
<th>Article</th>
<th>28</th>
<th>2</th>
<th>8</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>14–15</th>
</tr>
</thead>
</table>

(i) in the case of dependent services, persons whose presence exceeds 183 days in the calendar year, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State.
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<th>Effective date/year of assessment (in Singapore)</th>
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<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Luxembourg (1996) (terminated)</td>
<td>1.1.97</td>
<td>Income tax on individuals, corporation tax, tax on company directors’ fees, capital tax and communal trade tax</td>
<td>Tax reduction of 50% in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to: (i) 5% of gross dividends if recipient is company holding at least 10% of dividend-paying company’s capital, or (ii) 10% of gross dividends in all other cases</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore tax on dividends, interest and royalties reduced or exempted under Singapore laws relating to incentives for the promotion of economic development in Singapore</td>
</tr>
</tbody>
</table>

Article 29 2 8 10 11 14 23
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malaysia (2016)</td>
<td>1.1.2007</td>
<td>Income tax and petroleum tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 10% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State is limited to 8% of the gross amount of royalties if the beneficial owner of the royalties is a resident of the other Contracting State</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except in the case of independent services, persons without fixed base of operation; and in the case of dependent services, assignments lasting 183 days or less in a calendar year and where the remuneration is not borne by a permanent establishment of the employer in the other Contracting State</td>
<td>Available for Singapore and Malaysia; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malaysia respectively</td>
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</tr>
<tr>
<td>Malaysia (1968) (terminated)</td>
<td>1.1.69</td>
<td>Income tax, tin profits tax and development tax</td>
<td>Tax reduction of 50% in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Normal rates</td>
<td>Normal rates</td>
<td>Normal rates</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other</td>
<td>Not available</td>
</tr>
</tbody>
</table>

**Chapter 22**

**Effective date/Year of Assessment (in Singapore)**

1. **Malaysia (2016)**
   - Effective date: 1.1.2007
   - Foreign taxes allowed as a credit: Income tax and petroleum tax
   - Tax on shipping and airline operations: Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State
   - Tax on dividends: Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 10% of gross interest except for exemption for interest paid to Government of either Contracting State
   - Tax on interest: Source country tax on royalties arising in one Contracting State is limited to 8% of the gross amount of royalties if the beneficial owner of the royalties is a resident of the other Contracting State
   - Tax on personal services: Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except in the case of independent services, persons without fixed base of operation; and in the case of dependent services, assignments lasting 183 days or less in a calendar year and where the remuneration is not borne by a permanent establishment of the employer in the other Contracting State
   - Tax sparing relief: Available for Singapore and Malaysia; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malaysia respectively

2. **Malaysia (1968) (terminated)**
   - Effective date: 1.1.69
   - Foreign taxes allowed as a credit: Income tax, tin profits tax and development tax
   - Tax on shipping and airline operations: Tax reduction of 50% in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State
   - Tax on dividends: Normal rates
   - Tax on interest: Normal rates
   - Tax on royalties: Normal rates
   - Tax on personal services: Income derived by individual resident in one Contracting State from personal services performed in the other
   - Tax sparing relief: Not available
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Malta</td>
<td>1.1.2009</td>
<td>Income tax</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Singapore and Malta; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malta respectively</td>
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<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Singapore and Malta; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malta respectively</td>
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</tbody>
</table>

Contracting State subject to tax in the latter except for assignments lasting 120 days or less.

<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment (in Singapore)</th>
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<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Singapore and Malta; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malta respectively</td>
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<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Singapore and Malta; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Malta respectively</td>
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<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
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<td>(i) 7% of gross interest if beneficial owner is a bank, or</td>
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<td>(ii)</td>
<td>10% of gross interest in all other cases</td>
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<tr>
<td>(ii)</td>
<td>in the case of independent services, if the individual's stay in the other Contracting State exceeds 183 days in any 12-month period, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State</td>
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<td>Mauritius</td>
<td>1.1.97</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% in one Contracting State for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Dividends exempt from source country tax if paid by company resident in one Contracting State to a resident of the other Contracting State who is beneficial owner of the dividends</td>
<td>Exempt from source country tax if interest arises in one Contracting State and paid to beneficial owner who is resident in the other Contracting State</td>
<td>Royalties arising in one Contracting State are exempt from source country tax if paid to beneficial owner who is resident in the other Contracting State</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State is subject to tax in the latter except for:</td>
<td>Available for Singapore and Mauritius tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Mauritius respectively</td>
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</tbody>
</table>

(i) in the case of independent service providers without fixed base of operation

(ii) in the case of dependent service providers, assignments lasting 183 days or less
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Mexico</td>
<td>1.1.96</td>
<td>Income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Dividends exempt from source country tax if paid by company resident in one Contracting State to a resident of the other Contracting State who is beneficial owner of the dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available only for Mexican tax foregone under Mexican laws</td>
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<tr>
<td>Article</td>
<td>28</td>
<td>2</td>
<td>8</td>
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<td>14–15</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<tr>
<td>Mongolia</td>
<td>1.1.2005</td>
<td>Income tax in Singapore; individual income tax and corporate income tax in Mongolia</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Singapore and Mongolia tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Mongolia respectively</td>
</tr>
</tbody>
</table>

Income tax in Singapore; international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
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<th>Tax sparing relief</th>
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<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 25% of the capital of the company paying the dividends</td>
<td>(i) 5% of gross interest if the beneficial owner is a bank or a similar financial institution</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>(ii) 10% of gross dividends in all other cases</td>
<td>(ii) 10% of gross interest in all other cases</td>
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<td>(ii) in the case of independent services, if the individual's stay in the other Contracting State exceeds 183 days in any 12-month period, in that case, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State</td>
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<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>(iii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Morocco</td>
<td>1.1.2015</td>
<td>Income tax in Singapore; income and corporation tax in Morocco</td>
<td>Income from international air transport and shipping operations subject to tax in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 10% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
<td>Available for Singapore and Morocco tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Morocco</td>
</tr>
</tbody>
</table>

In respect of dependent services, remuneration derived in respect of employment exercised aboard a ship or an aircraft operated in international traffic shall be taxable only in that Contracting State in which the place of effective management of the enterprise is situated.
<table>
<thead>
<tr>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(i) 8% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(ii) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<td>(ii) 10% of gross dividends in all other cases</td>
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<td>Article</td>
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<td>in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Myanmar</td>
<td>1.1.2010</td>
<td>Income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Dividends exempt from source country tax if paid by company/resident in one Contracting State to a resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
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<tr>
<td>Agreement assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>(i) 5% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or</td>
<td>(i) 8% of gross interest if beneficial owner is a bank or financial institution, or</td>
<td>(i) 10% of gross royalties in consideration for the use of, or the right to use, any patent, design or model, plan, secret formula or process, or for the use of, or the right to use, industrial, commercial or scientific equipment, or for information concerning industrial, commercial or scientific experience</td>
<td>(i) in the case of independent services, persons without fixed base of operation or stays for less than 183 days in a fiscal year or remunerated not more than US$12,000</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Article</td>
<td>29</td>
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<td>8</td>
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<td>11</td>
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<td>14-15</td>
</tr>
</tbody>
</table>

- (i) 10% of gross dividends in all other cases
- (ii) 10% of gross interest in all other cases
- (iii) exempt from tax if recipient is the Government of a Contracting State
- (iv) in the case of dependent services, assignments lasting 183 days or less in the fiscal year and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Netherlands</td>
<td>1.1.68</td>
<td>Income tax, wages, tax, company tax, dividend tax, tax on directors' fees and capital tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in Netherlands to resident of Singapore:</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to 10% of interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Royalties arising in one Contracting State and paid to resident in the other Contracting State exempt from source country tax, except for royalties for the use of, or the right to use, any copyright of literary or artistic work, including motion picture films and tapes for television or broadcasting, or sums from the alienation of any right of property giving rise to such royalties</td>
<td>Available for Singapore tax forgiven under the Economic Expansion Incentives (Relief from Income Tax) Act on interest and royalties only until 31.12.93. Tax sparing relief ceases to apply if abused</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Tax on royalties</td>
<td>Tax on personal services</td>
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<td>Article 29</td>
<td>1.1.2011</td>
<td>Income tax</td>
<td>Source country tax on dividends paid by company resident in one Contracting State to beneficial owner who is a resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Employment income derived by an individual resident in one Contracting State from an employment exercised in the other Contracting State subject to tax only in the former State</td>
<td>Available for Singapore tax on profits, interest and royalties forgiven under the Economic Expansion Incentives (Relief from Income Tax) Act</td>
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<td>New Zealand (2010)</td>
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<td>Agreement</td>
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<td>Article 25</td>
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</tbody>
</table>

(i) 15% of gross dividends in all other cases.

(ii) The remuneration is paid by an employer who is a resident in the other Contracting State, and the remuneration is borne by a PE of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>New Zealand (1973) (terminated)</td>
<td>1.1.74</td>
<td>Income tax and excess retention tax</td>
<td>Exempt from tax in one Contracting State for enterprise carried on by a resident of the other Contracting State</td>
<td>New Zealand tax on dividends paid by company resident in New Zealand to beneficial owner resident in Singapore limited to 15% of gross dividends</td>
<td>Source country tax on interest derived in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where in the case of independent services, persons without a fixed base of operation or stayings for less than 183 days in a 12-month period, and in the case of dependent services, assignments lasting 183 days or less in a 12-month period and where the remuneration is not borne by a permanent establishment of the employer in the other Contracting State</td>
<td>Available for Singapore tax on profits, interest and royalties forgone under the Economic Expansion Incentives (Relief from Income Tax) Act, provisions apply to prevent abuse</td>
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<tr>
<td>Article 23</td>
<td>23</td>
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<td>9</td>
<td>10</td>
<td>11 and Art IV of Protocol</td>
<td>19 and Protocol</td>
</tr>
<tr>
<td>Country</td>
<td>Effective date</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Norway</td>
<td>1.1.99</td>
<td>National income tax, county tax, municipal income tax, national tax relating to income, national tax relating to income from the exploration for and exploitation of submarine petroleum resources and activities, including pipeline transport of petroleum produced, national tax on remuneration to non-resident artis</td>
<td><strong>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</strong></td>
<td>For dividends paid by company resident in one Contracting State to resident of the other Contracting State who is beneficial owner of the dividends, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to 7% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 7% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available for Singapore tax forgone under the Economic Expansion Incentives (Relief from Income Tax) Act and Income Tax Act up until 31.12.2000</td>
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</tbody>
</table>

- (i) 5% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or

- (ii) in the case of independent service, persons without fixed base of operation or assignments lasting 183 days or less
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<td>(ii) 15% of gross dividends in all other cases, except that dividends paid by company resident in Norway to Government of Singapore is exempt from Norwegian tax. Note: dividends paid by company resident in Singapore to company resident in Norway which owns directly or indirectly at least 25% of dividend-paying company’s share capital shall be exempt from Norwegian tax.</td>
<td>(ii) in the case of dependent services, assignments lasting 183 days or less.</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Norway (1985) (terminated)</td>
<td>1.1.87</td>
<td>National income tax, county municipal income tax, municipal tax on income, national contributions to the Tax Equalisation Fund, national dues on remuneration to non-resident artists, and seamen's tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax deduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 15% of gross dividends for dividends paid by company resident in one Contracting State to a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident of the other Contracting State limited to 15% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State limited to 15% of gross royalties</td>
<td>Available for Singapore and Oman; tax reduced or exempted under tax incentives for the promotion of economic development in Singapore and Oman respectively</td>
<td></td>
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<tr>
<td>Oman (2006)</td>
<td>1.1.2007</td>
<td>Income tax in Singapore; company income tax and profit tax on commercial and industrial establishments in Oman</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to beneficial owner who is resident in another Contracting State limited to 5% of gross dividends;</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in another Contracting State limited to 7% of gross interest;</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in another Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>in the case of independent services, the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities; in that case, only income that is attributable to that fixed base may be taxed in that other Contracting State</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<td>14-15</td>
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</table>

(ii) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oman (Air transport treaty)</td>
<td>1.1.71</td>
<td>Company income tax and profit tax on commercial and industrial establishments</td>
<td>Exempt from tax in one Contracting State for international air transport operations</td>
<td>No specific provision</td>
<td>Exempt from tax in one Contracting State for interest derived from bank deposits connected with international air transport operations carried on by a resident of the other Contracting State</td>
<td>No specific provision</td>
<td>Income derived from employment exercised aboard an aircraft operated in international traffic shall be taxable only in the State where the air transport enterprise is managed and controlled</td>
<td>No specific provision</td>
</tr>
<tr>
<td>Pakistan</td>
<td>1.1.87</td>
<td>Income tax, super tax and surcharge</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State, source country tax is limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident of the other Contracting State limited to 12.5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore and Pakistan tax on dividends, interest, royalties or fees for technical services forgone under incentives to promote economic development in Singapore and Pakistan respectively</td>
</tr>
<tr>
<td>Article</td>
<td>Effective date/year of agreement assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<tr>
<td>Panama</td>
<td>1.1.2012</td>
<td>Income tax</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>No specific provision</td>
</tr>
</tbody>
</table>

- (i) 10% of gross dividends if beneficial owner is a company and dividend-paying company is engaged in an industrial undertaking
- (ii) 12.5% of gross dividends if beneficial owner is a company and dividend-paying company is not engaged in an industrial undertaking
- (iii) 15% in all other cases
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<td>(i) 4% of gross dividends if the beneficial owner is a company holding directly at least 10% of the capital of the dividend-paying company</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(j) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in the other Contracting State exceeds 270 days in any 12-month period, only income that is attributable to that fixed base or activities in the other</td>
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<td>Article</td>
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<td><strong>Foreign taxes allowed as a credit</strong></td>
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<td><strong>Tax on shipping and airline operations</strong></td>
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<td><strong>Tax on dividends</strong></td>
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<td><strong>Tax on interest</strong></td>
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<td><strong>Tax on royalties</strong></td>
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<td><strong>Tax on personal services</strong></td>
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<td><strong>Tax sparing relief</strong></td>
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<td>(i) 5% of gross dividends in all other cases</td>
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<td>(ii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
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<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Papua New Guinea</td>
<td>1.1.93</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 15% where dividend is paid by company resident in one Contracting State to a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State limited to 10% of gross interest</td>
<td>Income derived by individual resident in one Contracting State subject to tax in the latter except, for dependent services, where assignments last 183 days or less, and in the case of independent services, for: 1) persons without fixed base of operation</td>
<td>Available in respect of Papua New Guinea tax exempted or reduced under the Papua New Guinea Income Tax Act 1959 and the Industrial Development (Incentive to Pioneer Industries) Act</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
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<td>Article 29</td>
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<td>14-15</td>
<td>25</td>
<td>(i) income that is derived from performance of services for resident or permanent establishment of Contracting State and that exceeds $15,000 or its Singapore dollar equivalent, or (ii) assignments lasting 90 days or less</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Philippines</td>
<td>1.1.77</td>
<td>Income taxes</td>
<td>Tax charged in respect of international air transport and shipping operations limited to the lesser of</td>
<td>For dividends paid by company which is resident in one Contracting State to beneficial owner who is resident of the other Contracting State, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State:</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available for Singapore and Philippine taxes forgone under the special incentive laws designed to promote economic development in Singapore and the Philippines respectively</td>
</tr>
</tbody>
</table>

**Notes:**
- Income taxes include tax on dividends, tax on interest, and tax on royalties.
- The tax on personal services is subject to tax in the respective Contracting State.
- The tax sparing relief is available for Singapore and Philippine taxes forgone under the special incentive laws designed to promote economic development in Singapore and the Philippines respectively.
<table>
<thead>
<tr>
<th>Agreement assessment date/year (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(i) 1.5% of gross revenues derived from sources in Contracting State, or</td>
<td>(i) 15% of gross dividends if recipient is company or partnership holding at least 15% of Philippine company’s voting stock during part of the taxable year which precedes the date of payment of dividends and during the whole of its prior taxable year</td>
<td>(i) 15% of gross dividends in all other cases</td>
<td>(i) in the case of the Philippines, limited to 15% of gross royalties where royalties are paid by an enterprise registered with the Philippine Board of Investments and engaged in preferred activities and paid in respect of cinematographic films or tapes for television or broadcasting</td>
<td>(i) in the case of Singapore, where royalties are approved under the Economic Expansion Incentives (Relief from Income Tax) Act, they shall be exempt</td>
<td>(i) in the case of professional services, assignments lasting 90 days or less</td>
<td>(i) in other cases, assignments lasting 183 days or less</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Poland (2014)</td>
<td>1.1.2015</td>
<td>Income tax in Singapore, personal and corporate income taxes in Poland</td>
<td>Income from international air transport and shipping operations subject to tax in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State, limited to 5% of gross interest</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except:</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends</td>
<td></td>
<td>(i) Exempt from source country tax if paid to the Government of either Contracting State and certain banks</td>
<td>(i) 2% of gross royalties paid for the use of, or the right to use, any industrial, commercial or scientific equipment</td>
</tr>
<tr>
<td>Effective date/Year of Agreement assessment (in Singapore)</td>
<td>Foreign taxes</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax on personal services (in credit operations)</td>
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<td>(i) in the case of services if the individual in the other Contracting State performs services in the other Contracting State for a period or periods aggregating 365 days in any 15-month period; only so much of the income as is derived from the activities performed by the individual in the other Contracting State may be taxed in that State</td>
<td>10% of gross royalties in all other cases</td>
<td>5% of the gross shipping and airline operations in all other cases</td>
<td>10% of the gross dividends in all other cases</td>
<td>5% of the gross interest in all other cases</td>
<td>5% of the gross royalties in all other cases</td>
<td>10% of the gross personal services in all other cases</td>
<td>5% of the gross personal services (in credit operations) in all other cases</td>
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<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
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<td>14-15</td>
<td>(iii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<td>Poland (1993) (terminated)</td>
<td>1.1.94</td>
<td>Personal and corporate income taxes</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax limited to 10% of gross dividends for dividends paid by company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State, except source country tax exemption for dividends paid to Government of either Contracting State on shares held in joint stock companies of the other State</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
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<tr>
<td>Article</td>
<td>29</td>
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</table>

(i) persons without fixed base of operation or assignments lasting 90 days or less (for independent services)

(ii) assignments lasting 183 days or less (for dependent services)
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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</table>
| Portugal  | 1.1.2002                                      | Personal income tax, corporate income tax and the local surtax on corporate income tax | Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State | Source country tax limited to 10% of gross dividends for dividends paid by company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State, except source country tax exemption for dividends paid to Government of either Contracting State | Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to 10% of gross interest. Exemption would apply if:  
(a) the Government of either Contracting State is:  
(b) in the case of independent services, persons without fixed base of operation and stay for periods (in aggregate) for less than 183 days within a 12 month period | Source country tax on royalties arising in one Contracting State and paid to resident of the other Contracting State limited to 10% of gross royalties | Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for: | Not available |

*Notes:*
- Source country tax may be deducted in the source country for dividends paid to resident in the other Contracting State.
- Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State is limited to 10% of gross interest. Exemption would apply if:

- the Government of either Contracting State is:
  - in the case of independent services, persons without fixed base of operation and stay for periods (in aggregate) for less than 183 days within a 12 month period.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>(i) the debtor of interest</td>
<td>(i) the recipient of the interest payment, or</td>
<td>(ii) in the case of dependent services, assignments lasting 183 days or less over a 12-month period where remuneration is not paid by an employer which is a resident in the latter Contracting State and where the remuneration is not borne by a PE or fixed base in the latter Contracting State</td>
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<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<tr>
<td>Qatar</td>
<td>1.1.2008</td>
<td>Income taxes</td>
<td>Exempt from tax in one Contracting State for international shipping operations of an enterprise carried on by a resident of the other Contracting State</td>
<td>Dividends paid by a company that is a resident of a Contracting State to a resident of the other Contracting State shall be taxable only in that other Contracting State</td>
<td>Interest arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other Contracting State</td>
<td>Royalties arising in a Contracting State and paid to a resident of the other Contracting State may be taxed in that other Contracting State</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for</td>
<td>Available for residents of Singapore and Qatar for the first 10 years for which the treaty is effective, subject to extension by both States</td>
</tr>
</tbody>
</table>

Notes:
- (b) interest is paid to an institution in connection with any financing granted under an agreement between the Government of the Contracting States, or
- (c) if the interest payments were in respect of loans or credit made by designated institutions.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
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However, such interest may also be taxed in the Contracting State in which it arises according to the laws of that Contracting State, but if the beneficial owner of the interest is a resident of the other Contracting State, the tax so charged shall not exceed 5% of the gross amount of the interest.

However, such royalties may also be taxed in the Contracting State in which they arise according to the laws of that Contracting State, but if the beneficial owner of the royalties is a resident of the other Contracting State, the tax so charged shall not exceed 10% of the gross amount of the royalties.

(j) In the case of independent services, he/she has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, in that case, only income that is attributable to that fixed base may be taxed in that other Contracting State, or...
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<tr>
<th>Agreement date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Romania 1.1.2003</td>
<td>Tax on individuals’ income, profits, salaries and other similar remunerations, agricultural income and dividends</td>
<td>Profits from international air transport and shipping operations subject to tax in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>For dividend paid by company resident in one Contracting State to beneficial owner who is a resident in the other Contracting State, source country tax limited to 5% of gross dividends except for exemption in respect of dividends paid to Government of either Contracting State</td>
<td>Source country tax on interest arising in one Contracting State paid to beneficial owner resident in the other Contracting State limited to 5% of gross interest except for exemption for interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State paid to beneficial owner resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Not available</td>
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<tr>
<td>Article</td>
<td>28</td>
<td>2</td>
<td>8</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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Notwithstanding the above, exemption from tax in Romania for interest arising in Romania and paid to Singapore resident in respect of:

(a) external credit received by and/or guaranteed by the Government of Romania, the National Bank of Romania and designated financial or banking institutions, and

(i) in the case of independent services, persons without fixed base of operation, and

(ii) in the case of dependent services, assignments lasting 183 days or less in any 12-month period in the calendar year and the remuneration is not borne by a resident of the other Contracting State or a permanent establishment/ fixed base of the employer in the other Contracting State.
<table>
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<tr>
<th>Article</th>
<th>Russian Federation (2009) (updated by 2016 Protocol)</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>30</td>
<td>Up to 31 December 2016: Income tax in Singapore; tax on profits of enterprises and organisations and income tax on individuals in the Russian Federation</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
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<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
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<td>2</td>
<td>1.1.2010</td>
<td>Up to 31 December 2016: Income tax in Singapore; tax on profits of enterprises and organisations and income tax on individuals in the Russian Federation</td>
<td>Up to 31 December 2016: Income tax in transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Up to 31 December 2016: Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross interest.</td>
<td>Up to 31 December 2016: Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross interest.</td>
<td>Up to 31 December 2016: Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties</td>
<td>Up to 31 December 2016: Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Available for Russia; tax reduced or exempted under tax incentives for the promotion of economic development in Russia for the first five years for which the treaty is effective, subject to extension by both States</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>(i) 5% of gross dividends if the beneficial owner is the Government of the other Contracting State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(ii) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State, or</td>
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<tr>
<th>Agreement effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<td>(ii) 5% of gross dividends if the beneficial owner is a company that holds directly at least 15% of the capital of the company paying the dividends and has invested at least US$100,000 or its equivalent in other currencies in it.</td>
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<td>(ii) in the case of independent services, if the individual’s presence in the other Contracting State exceeds 90 days in any 12-month period, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State.</td>
</tr>
<tr>
<td>Effective date/year of Agreement assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax on personal sparing relief</td>
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<td>(i)</td>
<td>10% of gross in all cases</td>
<td>(iii) in the case of services if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where the remuneration is borne by a permanent establishment or a fixed base of the employer in the other Contracting State</td>
<td>(iii) in the case of services if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where the remuneration is borne by a permanent establishment or a fixed base of the employer in the other Contracting State</td>
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<tr>
<td>Effective date/year of assessment in Singapore</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>1.1.2017 (2016 Protocol)</td>
<td>With effect from 1 January 2017: Income tax in Singapore; tax on profit of organisations and tax on income of individuals in the Russian Federation</td>
<td>With effect from 1 January 2017: Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State</td>
<td>With effect from 1 January 2017: Exempt from source country tax if paid to a resident of the other Contracting State</td>
<td>With effect from 1 January 2017: Source country tax on royalties arising in one Contracting State and paid to beneficial owner resident in the other Contracting State limited to 5% of gross royalties</td>
<td>With effect from 1 January 2017: Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
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</table>

In respect of dependent services, remuneration derived in respect of employment exercised aboard a ship or an aircraft operated in international traffic by an enterprise of a Contracting State shall be taxable only in that Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
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<th>Tax sparing relief</th>
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<td>(i) 5% of gross dividends if the beneficial owner of the dividends is a company which holds directly at least 15% of the capital of the company paying the dividends</td>
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In the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State, or
<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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<td>(i) 10% of gross dividends in all other cases</td>
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<td>(i) in the case of independent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period; only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State (ii) in the case of dependent services, as before</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Rwanda</td>
<td>1.1.2017</td>
<td>Income tax in Singapore; personal income tax, corporate income tax, withholding taxes, tax on rent of immovable properties in Rwanda</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Income derived by an individual resident in one Contracting State from employment services performed in the other Contracting State subject to tax only in the former except for: persons whose presence exceeds 183 days in the calendar year, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
<td>Not available</td>
</tr>
<tr>
<td>Article 27</td>
<td>2016</td>
<td>Income in Brazil; personal income tax, withholding taxes, tax on personal income</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 12% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Not available</td>
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<tr>
<td>San Marino</td>
<td>1.1.2016</td>
<td>Income tax</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 12% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Not available</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Article</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
<td>in the case of independent services, persons with a fixed base of operation or who stay at least 365 days in any 15-month period</td>
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<td>(ii)</td>
<td>in the case of dependent services, persons whose presence exceeds 183 days in the calendar year, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<tr>
<td>Saudi Arabia</td>
<td>1.1.2012</td>
<td>Income tax in Singapore, Zakat and income tax (including the natural gas investment tax) in Saudi Arabia</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on income from debt-claims arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross income from debt-claims</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where: Available for tax exempted or reduced for the promotion of economic development in Singapore and Saudi Arabia. This will apply for the first five years for which the Agreement is in effect</td>
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<tr>
<td>Effective date/year of Agreement in force (in Singapore)</td>
<td>Foreign taxes, if any</td>
<td>Tax on shipping and navigation operations</td>
<td>Tax on personal services</td>
<td>Tax on royalties</td>
<td>Tax on interest</td>
<td>Tax on dividends</td>
<td>Agreement assessment allowed as a credit or relief in Singapore</td>
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| (i) in the case of independent individuals, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her presence in that State exceeds 183 days in any 12-month period, only income that is attributable to that fixed base or presence in the other State is taxable.
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Contracting State may be taxed in that other Contracting State

(ii) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
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<th>Tax on shipping and airline operations</th>
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<tr>
<td>Saudi Arabia (Air transport treaty)</td>
<td>1.1.79</td>
<td>Income tax on companies</td>
<td>Exempt from tax in one Contracting State for international air transport operations of enterprise carried on by a resident of the other Contracting State</td>
<td>No specific provisions on these matters as this treaty is restricted to mutual tax exemption of income from international air transport operations</td>
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<td>Seychelles</td>
<td>1.1.2016</td>
<td>Income tax in Singapore; business tax, income and non-monetary benefits tax and petroleum income tax in Seychelles</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Exempt from source country tax if paid to a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 12% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for: (i) in the case of independent services, persons with a fixed base of operation or who stay at least 365 days in any 15-month period</td>
<td>Not available</td>
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<td>Slovak Republic</td>
<td>1.1.2007</td>
<td>Income tax in Singapore; tax on income of individuals; and tax on income of legal persons in Slovak Republic</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State</td>
<td>Exempt from source country tax if interest arising in one Contracting State is paid to a beneficial owner who is resident in the other Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
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<td>() 5% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends, or</td>
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<td>() in the case of independent services, the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities; in that case, only income that is attributable to that fixed base may be taxed in that other Contracting State, or</td>
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<td>Agreement</td>
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<td>Tax on shipping and airline operations</td>
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<td>(ii) 10% of gross dividends in all other cases</td>
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<td>(i) in the case of independent services, the individual’s stay in the other Contracting State exceeds 183 days in any 12-month period, in that case, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State</td>
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<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>Exempt from source country tax if paid to the Government of the other Contracting State</td>
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<td>(iii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
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<td>Tax on shipping and airline operations</td>
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<td>Slovenia</td>
<td>1.1.2011</td>
<td>Income tax in Singapore; tax on income of legal persons and tax on income of individuals in Slovenia</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in an individual resident in the Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
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<tr>
<td>Effective date/year of Agreement (in Singapore)</td>
<td>Foreign taxes (credit)</td>
<td>Tax on shipping and airfreight operations</td>
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<td>Tax on personal services</td>
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<td>12</td>
<td>Article 28</td>
<td>23</td>
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</table>

Contracting State may be taxed in that other Contracting State

(ii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Africa (2016)</td>
<td>1.1.2017</td>
<td>Income tax in Singapore; normal tax, dividends tax, withholding tax on interest, withholding tax on royalties, and tax on foreign entertainers and sportspersons in South Africa</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of the gross dividend</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 7.5% of the gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Employment income derived by an individual resident in one Contracting State from the other Contracting State subject to tax only in the former except for persons whose presence exceeds 183 days in any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
<td>Not available</td>
</tr>
</tbody>
</table>

(i) 5% of the gross dividends if the beneficial owner is a company which holds at least 10% of the capital of the company paying the dividend, or Exempt from source country tax if:
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>South Africa (1997) (terminated)</td>
<td>1.199</td>
<td>Normal tax, non-resident shareholders' tax and secondary tax on companies</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State</td>
<td>Exempt from source country tax for interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Not available</td>
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<tr>
<td>Article 26</td>
<td>2006</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
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<td>12</td>
<td>13–14</td>
<td>(i)</td>
</tr>
</tbody>
</table>

(i) 5% of gross dividends if recipient is company holding at least 10% of dividend-paying company’s capital, or

(ii) 15% of gross dividends in all other cases

(i) in the case of dependent services, assignments lasting 183 days or less

(ii) in the case of independent services, persons without fixed base of operation or assignments lasting 183 days or less
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Spain</td>
<td>1.1.2013</td>
<td>Income tax in Singapore; income tax on individuals; corporation tax; income tax on non-residents and local taxes on income in Spain</td>
<td>Profits from international air transport and shipping operations subject to tax only in the Contracting State in which the place of effective management of the enterprise is situated</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former, except in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE of the employer in the other Contracting State</td>
<td>Not available</td>
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</tbody>
</table>

(i) 0% of gross dividends if the beneficial owner is a company holding directly at least 10% of the capital of the dividend-paying company.
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Article 26</td>
<td>11.1.2018</td>
<td>Income tax</td>
<td>50% tax reduction for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>(i) 5% of gross dividends in all other cases</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in another Contracting State limited to 10% of gross interest, except for exemption for interest paid to the Government, banking or financial institution of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 90% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
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(ii) in the case of independent services, persons with a fixed base of operation or who stay at least 183 days in any 12-month period | Not available |
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<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
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<td>Article</td>
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<td>14–15</td>
<td>(j) in the case of dependent services, persons whose presence exceeds 183 days within any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>Sri Lanka (1980) (terminated)</td>
<td>1.1.77</td>
<td>Income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in Sri Lanka to beneficial owner who is resident in Singapore, source country tax limited to 15% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross royalties for assignments lasting 183 days or less</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for assignments lasting 183 days or less</td>
<td>Available only for Sri Lankan tax exempted or reduced on dividend and interest under the special incentive laws designed to promote economic development in Sri Lanka</td>
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</tbody>
</table>

The table lists the tax treatments for various transactions between Singapore and Sri Lanka, including the effective date of agreements, foreign taxes allowed as a credit, and the tax implications for dividends, interest, royalties, and personal services.
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
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<th>Tax on personal services</th>
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<tbody>
<tr>
<td>Sweden</td>
<td>1.1.66</td>
<td>State income tax, including sailors tax and coupon tax, tax on undistributed corporate profits and on distribution in connection with reduction of share capital or winding up, tax on public entertainers, communal income tax and State capital tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Source country tax on interest derived from one Contracting State and paid to beneficial owner who is resident in the other Contracting State</td>
<td>Royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State are exempt from source country tax, except for royalties in respect of literary or artistic copyrights, or motion picture films, cinematograph or tapes for television or broadcasting or operation of a mine, oil well, quarry, or any other place of extracting natural resources</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for: Available up to 31.12.2000 for Singapore tax forgiven under the incentive provisions contained in Singapore law designed to promote economic development in Singapore</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>(i) 10% of gross dividends if recipient is a parent company, or (ii) 5% of gross dividends if recipient is a company holding at least 10% of dividend-paying company's capital</td>
<td>(i) 10% of gross interest if the interest is derived by a financial institution and paid by an enterprise which engages in an industrial undertaking except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>(i) 15% of gross interest in other cases,</td>
<td>(i) in the case of dependent services, remuneration for services performed on aircraft in international traffic, and (ii) in the case of independent services, assignments lasting 183 days or less</td>
<td>12 and 15</td>
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</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>Switzerland</td>
<td>1.1.2013</td>
<td>Income tax in Singapore; federal, cantonal and communal taxes on income in Switzerland</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest; royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
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<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<tr>
<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 10% of the capital of the company paying the dividends</td>
<td>Exempt from source country tax if paid to a banking enterprise or the government of the other Contracting State</td>
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<td>(ii) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her stay in the other State exceeds 300 days within any 12-month period, only income that is attributable to that fixed base, or activities performed in that other State, may be taxed in that other Contracting State</td>
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<td>(ii) 15% of gross dividends in all other cases</td>
<td>(ii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in the calendar year where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State</td>
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<tr>
<th>Article</th>
<th>28</th>
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<th>10</th>
<th>11</th>
<th>12</th>
<th>14-15</th>
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<tbody>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<tr>
<td>Switzerland (1976) (terminated)</td>
<td>1.1.75</td>
<td>Federal, cantonal and communal taxes on income and capital</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is resident of the other Contracting State, source country tax limited to: (i) 10% of gross dividends if recipient is company holding at least 25% of dividend-paying company’s capital, or (ii) 15% of gross dividends in all other cases</td>
<td>Source country tax on interest derived from one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of gross interest except that interest arising in Singapore and paid to resident of Switzerland is exempt from Singapore tax if loan or indebtedness is approved by Finance Minister of Singapore</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties except that royalties arising in Singapore and paid to a resident in Switzerland are exempt from Singapore tax if approved by the Finance Minister of Singapore</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
</tr>
</tbody>
</table>

Article 26 | 26 | 2 | 8 | 10 | 11 | 12 | 14-15 | 22
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
<tbody>
<tr>
<td>Taiwan (Republic of China)</td>
<td>1.1.82</td>
<td>Income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax charged in respect of international shipping operations limited to 2% of gross revenue for enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company which is a resident in one Contracting State to beneficial owner who is a resident in the other Contracting State, source country tax restricted to amount which together with corporate income tax payable on profits of dividend-paying company constitute 40% of taxable income</td>
<td>Not covered by agreement</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 15% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for assignments lasting 183 days or less</td>
<td>Available for Singapore and Taiwanese tax forgone under laws designed to promote economic development in Singapore and Taiwan respectively (Note: To eliminate treaty shopping, Taiwan has announced that it will not give tax sparing credits to Taiwanese companies investing in China via Singapore)</td>
</tr>
</tbody>
</table>

Article 22
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Thailand (2016)</td>
<td>1.1.2017</td>
<td>Income tax in Singapore; income tax and petroleum income tax in Thailand</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to: (i) 10% of the gross amount of the interest if the interest is beneficially owned by any financial institution or insurance company (ii) 5% of the gross amount of the royalties if they are made as consideration for the use or the right to use any copyright of literary, artistic or scientific work including cinematograph films, or films or tapes used for radio or television broadcasting</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to: (i) in the case of independent services, persons with a fixed base of operation or who stay at least 183 days in any 12-month period</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for: (i) Not available</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>(i) 10% of the gross amount of the interest if the interest is beneficially owned by a resident of the other Contracting State and is paid with respect to indebtedness arising as a consequence of a sale on credit by a resident of that other Contracting State of any equipment, merchandise or services, except where the sale was between persons not dealing with each other at arm's length.</td>
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<td>(ii) 8% for the use of, or the right to use, any patent, trade mark, design or model, plan, secret formula or process, or for the use of, or the right to use, industrial, commercial, or scientific equipment.</td>
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<td>(iii) in the case of dependent services, persons whose presence exceeds 183 days within any 12-month period, and whose remuneration is borne by a resident of the other Contracting State or a permanent establishment/fixed base of the employer in the other Contracting State.</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
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<td>14-15</td>
<td>18-20</td>
</tr>
<tr>
<td>Thailand (1976) (terminated)</td>
<td>1.176</td>
<td>Income tax and petroleum income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State, source country tax limited to 20% of gross dividends if recipient is company holding at least 25% of voting shares of dividend-paying company</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available only for Thai tax forgiven under the special incentive laws designed to promote economic development in Thailand</td>
</tr>
</tbody>
</table>

(i) 10% of gross interest if received by any financial institution (including insurance company)  
(ii) 25% of gross interest in other cases.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turkey</td>
<td>1.1.2002</td>
<td>Income tax, corporation tax and levy imposed on such taxes</td>
<td>Exempt from tax in one Contracting State for international air transport operations and tax reduction of 50% for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Exempt from tax in one Contracting State for dividends paid by a company resident in one Contracting State to beneficial owner who is a resident of the other Contracting State</td>
<td>Source country tax on interest arising in one Contracting State and paid to a resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Source country tax on royalties arising in one Contracting State and paid to the beneficial owner who is a resident in the other Contracting State limited to 10% of gross royalties</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available only for Turkish tax forgone under the special incentive measures for promotion of economic development in Turkey but reliefs would cease from YA 2013</td>
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<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>(i) 10% of gross dividends if recipient is a company holding at least 25% of the capital of the dividend-paying company</td>
<td>(i) 7.5% of gross interest if received by any financial institution</td>
<td>(ii) 10% of gross interest in other cases,</td>
<td>(ii) in the case of independent services, persons without a fixed base of operation or on assignments lasting 183 days or less within a calendar year in the case of dependent services, assignments lasting 183 days or less in the calendar year, the remuneration is paid by a non-resident employer, and the remuneration is not paid by/on behalf of a PE or fixed base of the employer in the latter Contracting country</td>
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<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<tr>
<td>Article</td>
<td>28</td>
<td>2</td>
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<td>except for exemption in respect of dividends paid to the Government of the other Contracting State</td>
<td>except for exemption in respect of interest paid to the Government of the other Contracting State</td>
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<tr>
<td>Ukraine</td>
<td>1.1.2010</td>
<td>Income tax in Singapore; individual income tax and tax on profits of enterprises in Ukraine</td>
<td>Profits from international air transport and shipping operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of gross interest;</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 7.5% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where: Not available</td>
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<tr>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<tr>
<td>(i) 5% of gross dividends if the beneficial owner is a company that holds directly at least 20% of the capital of the company paying the dividends</td>
<td>Exempt from source country tax if paid to the Government of the other Contracting State, or the Central Bank thereof, or any other government institution thereof or statutory body as may be agreed between the authorities of the two States</td>
<td>(ii) In the case of independent services, the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities; in that case, only income that is attributable to that fixed base may be taxed in that other Contracting State, or</td>
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<td>Agreement</td>
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<td>(ii) 15% of gross dividends in all other cases</td>
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<td>(ii) in the case of independent services, if the individual’s stay in the other Contracting State exceeds 183 days in any 12-month period, in that case, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State</td>
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<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
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</table>

Exempt from source country tax if the beneficial owner is the Government of the other contracting state, or the Central Bank thereof, or any other government institution thereof or statutory body as may be agreed between the authorities of the two States.

(iii) in the case of dependent services, if the individual’s presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Arab Emirates (1996)</td>
<td>1.1.92</td>
<td>Exempt from tax in one Contracting State for international shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>Up to 31 December 2016. Source country tax limited to 5% of gross dividends where dividends paid by company resident in one Contracting State to beneficial owner resident in the other Contracting State</td>
<td>Up to 31 December 2016. Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 7% except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 5% of gross royalties</td>
<td>Up to 31 December 2016. Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available for Singapore tax forgone under the provision’s concerning the special incentive measures to promote economic development in Singapore</td>
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<td>With effect from 1 January 2017: Exempt from source country tax if paid to a resident of the other Contracting State</td>
<td>With effect from 1 January 2017: Exempt from source country tax if paid to a resident of the other Contracting State</td>
<td></td>
<td>(i) in the case of independent services, persons without fixed base of operation or assignments lasting 183 days or less</td>
<td>(ii) in the case of dependent services, assignments lasting 183 days or less</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
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<td>12</td>
<td>13–14</td>
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</tr>
</tbody>
</table>

With effect from 1 January 2017, income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:

(i) in the case of independent services, persons without fixed base of operation or assignments lasting 300 days in a calendar year concerned or less

(ii) in the case of dependent services, assignments lasting 183 days or less
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Arab Emirates (Air transport treaty)</td>
<td>1.1.71</td>
<td>Income tax</td>
<td>Exempt from tax in one Contracting State for international air transport operations of enterprise carried on by a resident of the other Contracting State</td>
<td>No specific provisions on these matters as this treaty is restricted to mutual tax exemption of income from international air transport operations</td>
<td>Exempt from tax in one Contracting State for interest derived from bank deposits connected with international air transport operations carried on by a resident of the other Contracting State</td>
<td>No specific provision</td>
<td>Income derived from employment exercised aboard an aircraft operated in international traffic shall be taxable only in the State of residence of the air transport enterprise</td>
<td>No specific provision</td>
</tr>
<tr>
<td>Article 6</td>
<td>1</td>
<td>3</td>
<td>Available</td>
<td>No specific provision to mutual tax exemption of income from international air transport operations</td>
<td>Exempt from tax in one Contracting State for interest derived from bank deposits connected with international air transport operations carried on by a resident of the other Contracting State</td>
<td>No specific provision</td>
<td>Income derived from employment exercised aboard an aircraft operated in international traffic shall be taxable only in the State of residence of the air transport enterprise</td>
<td>No specific provision</td>
</tr>
<tr>
<td>United Kingdom (1997) (updated by 2012 Protocol)</td>
<td>1.1.98</td>
<td>Income tax, corporation tax and capital gains tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>No specific provisions</td>
<td>Available for Singapore tax forgone under the Economic Expansion Incentives (Relief from Income Tax) Act up to 31.12.2001</td>
<td>No specific provision</td>
<td>Income derived from employment exercised aboard an aircraft operated in international traffic shall be taxable only in the State of residence of the air transport enterprise</td>
<td>No specific provision</td>
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</table>

*Note: The table provides information on tax provisions and treaties between different countries.*
<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<tbody>
<tr>
<td>29</td>
<td>(i) up to 31 December 2012: 5% of gross dividends if recipient is company holding at least 10% of dividend-paying company's capital, or (ii) up to 31 December 2012: 15% of gross dividends in all other cases (iii) from 1 January 2013: exempt from source country tax</td>
<td>(i) 15% of gross interest where interest arises or accrues on or before 31 December 1999 (ii) up to 31 December 2012: 10% of gross interest in other cases (iii) from 1 January 2013: 5% of gross interest in other cases except for exemption in respect of interest paid to Government of either Contracting State</td>
<td>(i) (ii) up to 31 December 2012: 15% of gross royalties where royalties arise or accrue on or before 31 December 1999 (iii) from 1 January 2013: 8% of gross interest in any other case</td>
<td>(i) 15% of gross royalties where royalties arise or accrue on or before 31 December 1999 (ii) up to 31 December 2012: 10% of gross royalties in any other case (iii) from 1 January 2013: 8% of gross interest in any other case</td>
<td>(i) in the case of independent services, persons without fixed base of operation or assignments lasting 183 days or less (ii) in the case of dependent services, assignments lasting 183 days or less</td>
<td>29</td>
<td>2</td>
<td>8</td>
</tr>
<tr>
<td>Agreement</td>
<td>Effective date/year of assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
<td>Tax on royalties</td>
<td>Tax on personal services</td>
<td>Tax sparing relief</td>
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<td>United Kingdom (1966) (terminated)</td>
<td>1.1.66</td>
<td>Income tax (including surtax), profits tax, corporation tax and capital gains taxes</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in United Kingdom to a resident of Singapore, United Kingdom tax on aggregate of value of dividends and tax credit receivable by recipient of dividends is limited to 15% of gross dividends</td>
<td>Source country tax on interest derived from one Contracting State by resident of the other Contracting State who is subject to tax in that other State is limited to 15% of gross interest except for exemption from Singapore tax in respect of interest on approved foreign loans within meaning of Pt V of the Economic Expansion Incentives (Relief from Income Tax) Act and certified to be for the purpose of promoting industrial development in Singapore</td>
<td>Source country tax on royalties arising in one Contracting State and paid to resident in the other Contracting State where such royalties are taxed is limited to 15% of gross royalties except for royalties in respect of motion picture films or tapes for telecasting or of operation of a mine, oil well, quarry or any other place of extraction of natural resources;</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except where assignments last 183 days or less</td>
<td>Available for Singapore tax forgone under Economic Expansion Incentives (Relief from Income Tax) Act</td>
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</tbody>
</table>

### Chapter 22

**Effective date/year of Foreign taxes Tax on shipping Tax on personal and airline Tax on dividends Tax on interest Tax on royalties sparing services (in credit operations relief**

**Source country tax exemption for approved royalties arising in Singapore, paid to UK resident and taxed in the UK**

**Article 23**

- Exempt from tax in one State of Contracting State for air transport or shipping operations

- **United States of Contracting State for air transport or shipping operations of an enterprise carried on by a resident of the other Contracting State**

- No specific article
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uruguay</td>
<td>1.1.2018</td>
<td>Income tax in Singapore; tax on business income, tax on personal income, non-residents' income tax, tax for social security assistance and capital tax in Uruguay</td>
<td>Profits derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic shall be taxable only in that State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 10% of the gross dividend, or 5% of the gross dividends if the beneficial owner is a company which holds at least 10% of the capital of the company paying the dividend, or</td>
<td>Source country tax on interest arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to 10% of the gross interest</td>
<td>Exempt from source country tax if the interest is paid to certain institutions agreed between the Contracting States</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except for:</td>
<td>Not available</td>
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</tbody>
</table>

*Uruguay: Information on sources of income derived by an enterprise of a Contracting State from the operation of ships or aircraft in international traffic is resident in the other Contracting State is limited to:*
<table>
<thead>
<tr>
<th>Article</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uzbekistan</td>
<td>1.1.2009</td>
<td>Income tax in Singapore; tax on income of legal persons and tax on income of individuals in Uzbekistan</td>
<td>Profits from international air transport, shipping, road and railway operations derived by an enterprise of a Contracting State subject to tax only in that Contracting State</td>
<td>Source country tax on dividends arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross dividends</td>
<td>Source country tax on interest arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 5% of gross interest</td>
<td>Source country tax on royalties arising in one Contracting State and paid to a beneficial owner who is resident in the other Contracting State limited to 8% of gross royalties</td>
<td>Income derived by an individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax only in the former except where:</td>
<td>Not available</td>
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<td>28</td>
<td>1999</td>
<td>2</td>
<td>8</td>
<td>10</td>
<td>11</td>
<td>12</td>
<td>14-15</td>
<td></td>
</tr>
</tbody>
</table>

<p>| (i) | 10% of the gross dividends in all other cases |
| (i) | 10% of gross royalties in all other cases |
| (i) | in the case of dependent services, assignments lasting 183 days or less in a 12-month period and the remuneration is not borne by a permanent establishment of the employer in the other Contracting State |</p>
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
</table>

(i) in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, only income that is attributable to that fixed base may be taxed in that other Contracting State, or
<table>
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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</thead>
</table>

(ii) in the case of independent services, if the individual’s stay in the other Contracting State exceeds 183 days in any 12-month period, only income that is derived from his/her activities performed in that other Contracting State may be taxed in that other Contracting State.
<table>
<thead>
<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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<th>Tax sparing relief</th>
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</table>

(iii) in the case of dependent services, if the individual's presence in the other Contracting State exceeds 183 days in any 12-month period where remuneration is paid by an employer who is a resident in the other Contracting State and where the remuneration is borne by a PE or fixed base of the employer in the other Contracting State.
<table>
<thead>
<tr>
<th>Agreement (In Singapore)</th>
<th>Effective date/year of assessment</th>
<th>Foreign taxes allowed as a credit</th>
<th>Tax on shipping and airline operations</th>
<th>Tax on dividends</th>
<th>Tax on interest</th>
<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
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<tbody>
<tr>
<td>Article 27</td>
<td>2</td>
<td>8</td>
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<td>11</td>
<td>12</td>
<td>14-15</td>
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</tbody>
</table>

In respect of dependent services, remuneration derived in respect of employment exercised aboard a ship or an aircraft operated in international traffic by an enterprise of a Contracting State shall be taxable only in that Contracting State.
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<tr>
<th>Agreement</th>
<th>Effective date/year of assessment (in Singapore)</th>
<th>Foreign taxes allowed as a credit</th>
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<th>Tax on royalties</th>
<th>Tax on personal services</th>
<th>Tax sparing relief</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vietnam (updated by 2013 Protocol)</td>
<td>1.1.93</td>
<td>Personal income tax, profit tax, profit remittance tax, foreign petroleum subcontractor tax and foreign contractor tax</td>
<td>Exempt from tax in one Contracting State for international air transport and shipping operations of enterprise carried on by a resident of the other Contracting State</td>
<td>For dividends paid by company resident in one Contracting State to beneficial owner who is a resident in the other Contracting State, source country tax limited to:</td>
<td>Source country tax on interest arising in one Contracting State and paid to resident in the other Contracting State limited to:</td>
<td>Source country tax on royalties arising in one Contracting State and paid to beneficial owner who is resident in the other Contracting State limited to:</td>
<td>Income derived by individual resident in one Contracting State from personal services performed in the other Contracting State subject to tax in the latter except for:</td>
<td>Available for Singapore and Vietnamese tax forgone under the Income Tax Act and the Economic Expansion Incentives (Relief from Income Tax) Act and the Law on Foreign Investment in Vietnam respectively</td>
</tr>
<tr>
<td>Agreement assessment (in Singapore)</td>
<td>Foreign taxes allowed as a credit</td>
<td>Tax on shipping and airline operations</td>
<td>Tax on dividends</td>
<td>Tax on interest</td>
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<td>(i) 5% of gross dividends if beneficial owner has directly or indirectly contributed more than 50% of dividend-paying company’s capital or more than US$10 million</td>
<td>(i) 10% of gross interest</td>
<td>(i) 5% of gross royalties for royalties for the use of, or the right to use any patent, design or model, plan, secret formula or process or industrial, commercial or scientific equipment, or information concerning industrial, commercial or scientific experience</td>
<td>up to 31 December 2013: in the case of independent services, persons without fixed base of operation</td>
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<td>Agreement</td>
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<td>(ii) 7% of gross dividends if beneficial owner has directly or indirectly contributed between 2.5% and 5.0% of dividend-paying company’s capital</td>
<td>(ii) with effect from 1 January 2014, if Vietnam, in any DTA with any other State, provides for a rate of less than 10% on the gross amount of interest, then that lower rate shall apply in the DTA between Singapore and Vietnam,</td>
<td>(i) up to 31 December 2013: 15% in other cases</td>
<td>(i) from 1 January 2014 in the case of independent services, if the individual has a fixed base regularly available to him/her in the other Contracting State for the purpose of performing his/her activities, or if his/her stay in the other State exceeds 183 days within any 12-month period, only income that is attributable to that fixed</td>
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<tr>
<td>Article</td>
<td>Effective date/year of assessment (in Singapore)</td>
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<td>(iii) 12.5% of gross dividends in all other cases</td>
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<td>base, or activities performed in that other State, may be taxed in that other Contracting State in the case of dependent services, assignments lasting 183 days or less</td>
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<td>(iii) from 1 January 2014: 10% in other cases</td>
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<td>34–35</td>
<td>24</td>
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