

**ANNEX A: SUMMARY TABLE ON PROPOSED CHANGES TO THE INCOME TAX ACT 1947 (“ITA”)
AS ANNOUNCED IN THE 2024 BUDGET STATEMENT**

S/N	Proposed Legislative Change	Brief Description of Proposed Legislative Changes	Proposed Amendment to ITA [Clause in Proposed Income Tax (Amendment) Bill 2024]
1	Corporate Income Tax (“CIT”) Rebate for the Year of Assessment (“YA”) 2024, with a CIT Rebate Cash Grant for eligible companies	<p>To help companies manage rising costs, a CIT Rebate of 50% of tax payable will be granted for YA 2024. Companies that have employed at least one local employee in 2023 (referred to as “local employee condition”) will receive a minimum benefit of \$2,000 in the form of a cash payout.</p> <p>The maximum total benefit that a company may receive is \$40,000.</p> <p>A company is considered to have met the local employee condition if it has made CPF contributions to at least one local (i.e., Singapore Citizen or Permanent Resident) employee, excluding shareholders who are also directors of the company, in the calendar year 2023.</p>	<p>Sections 36B(1), 92J, and 107(28A)</p> <p>[Clauses 16, 28 and 32]</p>
2	Enhance the tax deduction for Renovation or Refurbishment (“R&R”) expenditure	<p>To ease businesses’ compliance burden and improve the relevance of the scheme, MOF will introduce the following enhancements from YA 2025:</p> <ol style="list-style-type: none"> a. Expand the scope of qualifying expenditure to include designer or professional fees; b. Fix the relevant three-year period for the purpose of computing the R&R expenditure cap, with the first three-year period being from YA 2025 to YA 2027. MOF will 	<p>Section 14N</p> <p>[Clause 13]</p>

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		<p>transition all businesses to the fixed relevant three-year period; and</p> <p>c. Allow an option to claim R&R deductions, which are normally claimed over three YAs, in one YA, subject to the prevailing expenditure cap.</p>	
3	Introduce the Refundable Investment Credit (“RIC”)	To enhance Singapore’s attractiveness for investments, MOF will introduce the RIC, which will support up to 50% of qualifying expenditures for qualifying activities on an approval basis, through the economic agencies. The credits are to be offset against CIT payable. Any unutilised tax credits will be refunded to the company in cash within four years from when the economic agency has confirmed the amount of RIC that the company is eligible for.	Section 93B [Clause 29]
4	Extend and revise the tax incentive schemes for funds managed by Singapore-based fund managers (referred to as “Qualifying Funds”)	<p>To continue to grow Singapore’s asset and wealth management industry, the schemes will be extended till 31 December 2029. In addition, the following key changes will be made:</p> <p>a. The section 130 scheme will be enhanced to include limited partnerships registered in Singapore; and</p> <p>b. The economic criteria for Qualifying Funds under the sections 13D, 13O and 13U schemes will be revised.</p> <p>These key changes will take effect from 1 January 2025.</p>	<p>Sections 13D, 13O, 13OA, 13U, 37AA(2)(aa), (8), (9) and (13)(a), and 100(2)</p> <p>[Clauses 5, 9, 10, 11, 19 and 30]</p>

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5	<p>Introduce an alternative basis of tax where the qualifying income of shipping entities will be taxed by reference to net tonnage, for the following Maritime Sector Incentive (“MSI”) sub-schemes:</p> <ul style="list-style-type: none"> a. MSI-Shipping Enterprise (Singapore Registry of Ship) (“MSI-SRS”) b. MSI-Approved International Shipping Enterprise (“MSI-AIS”) c. MSI-Maritime Leasing (Ship) (“MSI-ML(Ship)”) 	<p>To better align our tax regime for shipping entities with common international practices, an alternative basis of tax where the qualifying income of qualifying shipping entities is taxed by reference to the net tonnage of their ships will be available under the MSI-SRS, MSI-AIS, and MSI-ML(Ship) from YA 2024.</p> <p>The existing tax treatment under the relevant MSI sub-schemes will continue to apply to MSI entities that are not under the alternative net tonnage basis of tax.</p>	<p>Section 34K and Twelfth Schedule</p> <p>[Clauses 15, 31 and 34]</p>
6	<p>Introduce an additional concessionary tax rate (“CTR”) tier of 10% for the Finance and Treasury Centre (“FTC”) incentive</p>	<p>As part of our periodic review to ensure that our tax incentives remain relevant and competitive, an additional CTR tier of 10% will be introduced under the FTC incentive. This will be available for incentive awards approved from 17 February 2024.</p>	<p>Section 43E</p> <p>[Clause 22]</p>
7	<p>Introduce an additional CTR tier of 10% for the Aircraft Leasing Scheme (“ALS”)</p>	<p>As part of our periodic review to ensure that our tax incentives remain relevant and competitive, an additional CTR tier of 10% will be introduced under the ALS. This will be available for incentive awards approved from 17 February 2024.</p>	<p>Section 43N</p> <p>[Clause 24]</p>

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8	Introduce an additional CTR tier of 15% for the Intellectual Property Development Incentive (“IDI”)	As part of our periodic review to ensure that our tax incentives remain relevant and competitive, an additional CTR tier of 15% will be introduced under the IDI. This will be available for incentive awards approved from 17 February 2024.	Section 43X [Clause 25]
9	Introduce an additional CTR tier of 15% for the Global Trader Programme (“GTP”)	As part of our periodic review to ensure that our tax incentives remain relevant and competitive, an additional CTR tier of 15% will be introduced under the GTP. This will be available for incentive awards approved from 17 February 2024.	Section 43I [Clause 23]
10	Personal Income Tax (“PIT”) Rebate for YA 2024	In view of cost-of-living concerns, a PIT Rebate of 50% of tax payable will be granted to all tax resident individuals for YA 2024. The rebate will be capped at \$200 per taxpayer.	[Clause 35]
11	Raise dependant’s or caregiver’s income threshold for dependant-related reliefs to \$8,000	To allow more taxpayers who are providing for dependant family members to enjoy dependant-related reliefs, while giving dependant family members the flexibility to do some work, the annual income threshold of a qualifying dependant or caregiver will be increased from \$4,000 to \$8,000 with effect from YA 2025 for the following reliefs: a. Spouse Relief; b. Parent Relief; c. Qualifying Child Relief; d. Working Mother’s Child Relief;	Section 39(2)(a), (2)(i), (2)(p) and (3AA), and Fifth Schedule [Clauses 21 and 33]

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		<p>e. CPF Cash Top-up Relief for top-up to the CPF account of spouse or siblings;</p> <p>f. Grandparent Caregiver Relief.</p>	
12	Lapse Course Fees Relief (“CFR”)	<p>With the introduction of more targeted direct subsidies to support lifelong learning and upskilling over the years, the CFR will be lapsed with effect from YA 2026.</p> <p>Individuals will continue to receive support for upskilling, reskilling, and career transitions through other existing Government initiatives, for example, course fee subsidies for SkillsFuture Singapore-funded courses, SkillsFuture Credit, SkillsFuture Career Transition Programmes, and Career Conversion Programmes.</p>	Section 39(12C) [Clause 21]
13	Remove CPF Cash Top-Up Relief for cash top-ups that attract matching grant from the Government under the Matched Retirement Savings Scheme (“MRSS”)	<p>As the MRSS matching grant is already a significant benefit extended by the Government, cash top-ups made on or after 1 January 2025 to the relevant CPF Account of a MRSS-eligible CPF member that attract the MRSS matching grant will no longer entitle the giver to the CPF Cash Top-Up Relief from YA 2026.</p> <p>A giver may continue to enjoy tax relief of up to \$16,000 a year for eligible CPF cash top-ups that do not attract the MRSS matching grant. The maximum amount of CPF Cash Top-Up Relief is \$8,000 per year for cash top-ups to the giver’s own Special Account, Retirement Account or MediSave Account,</p>	Section 39(3)(c)(i), (3A)(c)(i) and (3C) [Clause 21]

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		and another \$8,000 per year for cash top-ups to such accounts of the giver's loved ones.	
14	Introduce an Overseas Humanitarian Assistance Tax Deduction Scheme ("OHAS")	<p>To encourage giving towards overseas emergency humanitarian assistance causes, the OHAS will be piloted for four years from 1 January 2025 to 31 December 2028.</p> <p>The OHAS will provide individual and corporate donors with 100% tax deduction for qualifying overseas cash donations made through a designated charity and towards a fundraiser for emergency humanitarian assistance with a valid Fund-Raising for Foreign Charitable Purposes permit from the Commissioner of Charities. Tax deductions under the OHAS will be capped at 40% of the donor's statutory income. For donors who also receive tax deductions under the Philanthropy Tax Incentive Scheme for Family Offices ("PTIS"), tax deductions under both OHAS and PTIS will be jointly capped at 40% of the donor's statutory income.</p>	<p>Sections 37(7), 37A(9) and (11), and 37AB</p> <p>[Clauses 17, 18 and 20]</p>
15	Withdraw income tax concession on royalty income accorded to authors, composers, and choreographers	Royalty income derived by any author, composer, choreographer or any company wholly owned by such individuals in respect of literary, dramatic, musical and artistic work is brought to tax based on the lower of (i) the net amount of royalties (i.e., gross amount of royalties, less allowable deductions and capital allowances), and (ii) 10% of the gross amount of royalties.	<p>Section 10(14) and (15)</p> <p>[Clause 2]</p>

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		<p>To ensure parity in the treatment of royalty income, the tax concession will be withdrawn in phases with effect from YA 2027.</p> <p>For YA 2027 and YA 2028, eligible taxpayers may continue to claim the tax concession and report their taxable royalty income based on the lower of (i) the net amount of royalties, and (ii) a specified rate applied on the gross amount of royalties. The specified rate will be as follows:</p> <table border="1" data-bbox="743 753 1228 911"> <thead> <tr> <th data-bbox="743 753 894 829">YA</th> <th data-bbox="894 753 1228 829">Concessionary tax treatment</th> </tr> </thead> <tbody> <tr> <td data-bbox="743 829 894 870">2027</td> <td data-bbox="894 829 1228 870">40% of gross royalty</td> </tr> <tr> <td data-bbox="743 870 894 911">2028</td> <td data-bbox="894 870 1228 911">70% of gross royalty</td> </tr> </tbody> </table> <p>The tax concession will lapse after YA 2028. From YA 2029, taxpayers should report the net amount of royalties.</p>	YA	Concessionary tax treatment	2027	40% of gross royalty	2028	70% of gross royalty	
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