ANNEX C-2: TAX INCENTIVES RECOMMENDED BY EQUITIES MARKET REVIEW GROUP

The Equities Market Review Group was set up in August 2024 to recommend measures to strengthen equities market development in Singapore. The Review Group, chaired by Mr Chee Hong Tat, Minister for Transport, Second Minister for Finance and Deputy Chairman of MAS, comprises key private sector stakeholders and public sector representatives.

The Review Group has submitted tax-related recommendations to the Government, which aim to encourage new listings in Singapore and increase investment demand for Singapore-listed equities.

The Government has accepted these recommendations and will introduce three tax incentives:

- (A) Listing Corporate Income Tax ("CIT") Rebate for new corporate listings in Singapore;
- (B) Enhanced concessionary tax rate ("CTR") for new fund manager listings in Singapore; and
- (C) Tax exemption on fund managers' qualifying income arising from funds investing substantially in Singapore-listed equities.
- (B) and (C) are enhancements to the Financial Sector Incentive Fund Management ("FSI-FM"), which currently awards a CTR of 10% on qualifying income derived by fund managers in Singapore from the provision of fund management and investment advisory services.

The Review Group will share more details on its recommendations after Budget 2025.

(A) Listing Corporate Income Tax Rebate for New Corporate Listings in Singapore

To encourage companies to raise public capital and grow their economic activities in Singapore, qualifying entities may apply for a 10% or 20% Listing CIT Rebate. Refer to Table 1 for more details.

Table 1: Listing CIT Rebate for New Corporate Listings in Singapore

Parameter	Details	
Qualifying entities	Companies and registered business trusts that are tax residents in	
	Singapore	
Tax benefit	Primary listings: 20% CIT rebate	
	Secondary listings (with share issuance): 10% CIT rebate	
	Subject to rebate cap of:	
	(a) \$6 million per Year of Assessment ("YA") for qualifying	
	entities with market capitalisation of at least \$1 billion; or	

Parameter	Details	
	(b) \$3 million per YA for qualifying entities with market	
	capitalisation of less than \$1 billion	
Minimum criteria	Achieve a primary or secondary (with share issuance) listing on a	
	Singapore exchange and remain listed for 5 years.	
	Commit to incremental local business spending or fixed asset	
	investments, and incremental skilled employment by the end of	
	the award tenure.	
Award tenure	5 years per qualifying entity, non-renewable	
Scheme duration	Open for award until 31 December 2027	
Administering agency	stering agency Interested entities can approach EDB or EnterpriseSG to enqui	
	for more details	

(B) Enhanced CTR for New Fund Manager Listings in Singapore

To enhance Singapore's value proposition to fund managers seeking to scale up their activities via public fundraising and grow their investment activities in Singapore, an enhanced CTR tier of 5% will be introduced under the FSI-FM for newly listed fund managers. Refer to Table 2 for more details.

Table 2: Enhanced CTR for New Fund Manager Listings in Singapore

Parameter	Details	
Qualifying entities	Singapore fund managers	
Tax benefit	5% CTR on qualifying income	
Minimum criteria	Fund manager or its holding company achieves a primary listing	
	on a Singapore exchange and remains listed for 5 years.	
	Fund manager must distribute a portion of its profits as dividends.	
	Fund manager must also meet minimum requirements for	
	professional headcount and assets under management ("AUM").	
Qualifying income	Fees earned from qualifying fund management and investment	
	advisory activities under FSI-FM	
Award tenure	5 years per fund manager, non-renewable	
Scheme duration	Open for award until 31 December 2028	
Administering agency	Interested fund managers can approach MAS to enquire for more	
	details	

(C) Tax Exemption on Fund Managers' Qualifying Income Arising from Funds Investing Substantially in Singapore-Listed Equities

To support fund managers to launch and manage qualifying funds that invest substantially in Singapore-listed equities, a corporate tax exemption on income arising from such funds will be introduced under the FSI-FM. Refer to <u>Table 3</u> for more details.

<u>Table 3: Tax Exemption on Fund Managers' Qualifying Income Arising from Funds</u>
Investing Substantially in Singapore-Listed Equities

Parameter	Details		
Qualifying entities	Singapore fund managers		
Tax benefit	Tax exemption on qualifying income		
Minimum criteria	Fund managers must meet minimum requirements for		
	professional headcount and AUM, as currently required of FSI-FM companies.		
	Qualifying funds must meet the following criteria:		
	(a) For new funds: At least 30% of AUM invested in		
	Singapore-listed equities		
Qualifying income	 (b) For existing funds: (i) At least 30% of AUM invested in Singapore-listed equities; and (ii) Annual net inflows (i.e., subscriptions less redemptions to fund) equivalent to at least 5% of fund's AUM in the preceding year 		
Qualifying income	Fees earned from fund management and investment advisory		
	activities related to the qualifying funds (as defined in the minimum criteria)		
Award tenure	,		
Scheme duration	5 years per fund managed by fund manager, non-renewable		
	Open for award until 31 December 2028		
Administering agency	Interested fund managers can approach MAS to enquire for more details		

More Information

Scheme	Contact Details
Listing CIT Rebate for New Corporate	Please contact:
Listings in Singapore	a) EnterpriseSG at +65 6898 1800 or through
	their enquiry and feedback form; or
	b) EDB at <u>client_services@edb.gov.sg.</u>
Enhanced CTR for New Fund	Please contact MAS at helpdesk@mas.gov.sg .
Manager Listings in Singapore	
Tax Exemption on Fund Managers'	Please contact MAS at helpdesk@mas.gov.sg .
Qualifying Income Arising from	
Funds Investing Substantially in	
Singapore-Listed Equities	