

**Income Tax (Singapore — Korea) (Avoidance of Double Taxation Convention)
Order 2013**

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Enacting Formula

THE SCHEDULE

No. S 326

**INCOME TAX ACT
(CHAPTER 134)**

**INCOME TAX (SINGAPORE — KOREA)
(AVOIDANCE OF DOUBLE TAXATION CONVENTION)
ORDER 2013**

WHEREAS it is provided by section 49 of the Income Tax Act that if the Minister by order declares that arrangements specified in the order have been made with the government of any country outside Singapore with a view to affording relief from double taxation in relation to tax under the Act and any tax of a similar character imposed by the laws of that country, and that it is expedient that those arrangements should have effect, the arrangements shall have effect in relation to tax under the Act notwithstanding anything in any written law:

AND WHEREAS it is provided by section 105C of the Income Tax Act that the Minister may by order declare an avoidance of double taxation arrangement or an exchange of information arrangement as a prescribed arrangement for the purposes of Part XXA of the Act:

AND WHEREAS by a Convention dated 6th November 1979, between the Republic of Singapore and the Republic of Korea, arrangements were made, amongst other things, for the avoidance of double taxation:

AND WHEREAS by a Protocol dated 24th May 2010, between the Republic of Singapore and the Republic of Korea, the arrangements set out in the said Convention were modified as prescribed in the said Protocol:

NOW, THEREFORE, it is hereby declared by the Minister for Finance —

- (a) that the arrangements as modified by the said Protocol specified in the Schedule to this Order have been made with the Government of the Republic of Korea;
- (b) that it is expedient that those arrangements should have effect from 28th June 2013 notwithstanding anything in any written law; and
- (c) that those arrangements as modified by the said Protocol specified in the Schedule to this Order are a prescribed arrangement for the purposes of Part XXA of the Act.

THE SCHEDULE

PROTOCOL

AMENDING THE CONVENTION

BETWEEN

THE REPUBLIC OF SINGAPORE

AND

THE REPUBLIC OF KOREA

FOR

THE AVOIDANCE OF DOUBLE TAXATION AND THE PREVENTION OF FISCAL EVASION WITH RESPECT TO TAXES ON INCOME

The Government of the Republic of Singapore and the Government of the Republic of Korea,

Desiring to amend the Convention between the Government of the Republic of Singapore and the Government of the Republic of Korea for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income, with Protocol, signed at Singapore on 6 November 1979 (hereinafter referred to as “the Convention”),

Have agreed as follows:

ARTICLE I