

**Income Tax (Singapore — Sweden) (Avoidance of Double Taxation Convention)
(Supplementary) Order 1985**

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**INCOME TAX ACT
(CHAPTER 134, SECTION 49)**

**INCOME TAX (SINGAPORE — SWEDEN)
(AVOIDANCE OF DOUBLE TAXATION CONVENTION)
(SUPPLEMENTARY) ORDER 1985**

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G.N. No. S 91/1985

REVISED EDITION 1990

(25th March 1992)

[12th April 1985]

IT IS HEREBY notified for general information that the Government of the Republic of Singapore and the Government of the Kingdom of Sweden have agreed to extend for a further period of five years the application of paragraphs 5, 6 and 9 of Article XIX of the Convention between the Government of the Republic of Singapore and the Government of the Kingdom of Sweden for the Avoidance of Double Taxation and the Prevention of Fiscal Evasion with respect to Taxes on Income and Capital signed on 17th June 1968 as amended by the Protocol signed on 28th September 1983, to cover income derived during the period from 1st January 1986 to 31st December 1990.

The exchange of notes between the competent authorities of the two Governments

constituting the agreement for the extension is set out in the Schedule to this Order.

THE SCHEDULE

Sir,

In pursuant of paragraphs 5, 6 and 9 of Article XIX of the Convention between the Government of the Kingdom of Sweden and the Government of the Republic of Singapore for the avoidance of double taxation and the prevention of fiscal evasion with respect to taxes on income and capital, signed in Singapore on 17th June 1968 and amended by the Protocol which was signed in Singapore on 28th September 1983, I have the honour to propose that —

- (a) the provisions of paragraph 5 of Article XIX concerning the rate of Swedish tax credit to be allowed for dividends and interest derived from Singapore shall apply for a further period of five years following the expiry of the period of validity on 31st December 1985 as provided in the abovementioned paragraph 5;
- (b) where royalties as defined in paragraph 2 of Article IX are derived by a resident of Sweden from sources within Singapore, 50 per cent of the amount of such royalties shall be exempt from Swedish tax for a further period of five years following the expiry of the period of validity on 31st December 1985 as provided in the abovementioned paragraph 6;
- (c) the provisions of paragraph 9 of Article XIX concerning the meaning of the terms “Singapore tax payable” and “normal corporate income tax in Singapore or an income tax comparable thereto” for the purposes of paragraphs 3 and 4 of Article XIX shall apply for a further period of five years following the expiry of the period of validity on 31st December 1985 as provided in the abovementioned paragraph 9; and
- (d) the competent authorities shall consult each other in order to determine whether the periods in sub-paragraphs (a), (b) and (c) above shall be further extended.

2. In the event of these proposals being acceptable to you, this Note together with your Note accepting the proposals shall constitute an agreement between the competent authorities of the Government of the Kingdom of Sweden and the Government of the Republic of Singapore for the purposes of paragraphs 5, 6 and 9 of Article XIX.

3. I avail myself of this opportunity, Sir, to renew to you the assurance of my highest consideration.

Dated at Singapore this 4th day of March 1985.

KURT MALMGREN,

*Under-Secretary for Legal Affairs,
Ministry of the Finance,
Kingdom of Sweden.*

HSU TSE-KWANG,

*Commissioner of Inland Revenue,
Republic of Singapore.*

Sir,

I have the honour to acknowledge receipt of your Note of today's date which reads as follows:

“In pursuance of paragraphs 5, 6 and 9 of Article XIX of the Convention between the