ENTERING SINGAPORE

The Singapore Entry Guide: **Tax, Audit, and Compliance** for Foreign-Headquartered Groups

A working guide for the finance directors and group controllers of foreign-headquartered groups establishing or running a Singapore subsidiary, whether the parent sits in the UK, the US, the EU, Japan, or Korea: the tax system, the audit position, the compliance calendar, and the passes that move your people.

ABOUT THIS GUIDE

General information, **not advice.**

This guide is published by JK Medora PAC as general information for its intended readers. It is not professional advice, and it is not a substitute for advice on your own facts. Nothing in it creates a client relationship with the firm.

Regulatory figures, thresholds, and conditions change. Where this guide states a figure or a condition, the current published criteria of the relevant authority govern any assessment, whatever this guide says.

> FIGURES CURRENT AT PUBLICATION
>
> The figures and thresholds cited in this guide were checked against the relevant published sources and were current at publication, verified July 2026.

Before acting on anything in this guide, take professional advice on your own circumstances. A short conversation with a partner will establish where your situation sits against the rules described here.

PUBLISHED BY JK MEDORA PAC
22 MALACCA STREET, RB CAPITAL BUILDING
#03-02, SINGAPORE 048980

CONTENTS

What this guide **covers.**

Published rules, **foreign owners.**

For a foreign-headquartered group establishing in Asia, Singapore's offer is unusually concrete. The working language is English. The legal system is built on common-law foundations, company law and the accounting framework are published and current, and the authorities this guide cites, IRAS, ACRA, and MOM, publish the criteria that decide most of the questions in it. Singapore also maintains an extensive network of tax treaties; whether one covers your corridor, and what it changes, depends on where the parent sits and belongs with advisers on both sides of the structure.

That openness is the system's greatest strength and its most reliable trap. Because so much is published, and published in English, groups assume the instincts they bring from home will transfer. The differences that bite are administrative and specific: GST is not your home consumption tax by another name, the Year of Assessment lag is not your accounting-period basis, and the audit group test does not care how small the local entity is.

MEDORA'S READ

The expensive mistake, in every corridor, is treating Singapore as **home with sunshine.** The familiarity is real, and it is exactly why groups skip local advice until the first IRAS query.

XERXES J. MEDORA · MANAGING DIRECTOR

The questions foreign groups actually ask

Seven questions recur in first conversations with foreign finance teams, and they shape this guide.

- Do we need an audit for a small Singapore entity? Chapter 07, and the answer is usually yes, for a group-test reason.
- Who has to live in Singapore? Chapters 02 and 09.
- What does the compliance year look like? Chapter 08, with a worked 31 December calendar.
- When do we register for GST? Chapter 04.
- Will our intercompany arrangements hold? Chapter 06.
- How do profits come home? Chapter 05.
- How does our home jurisdiction treat the Singapore entity? A question for your home advisers; chapter 11 works it through for one jurisdiction, the United Kingdom.

Every figure in this guide carries a source line and a verification date, and the current published criteria of the relevant authority govern any assessment, whatever this guide says. Where a question belongs to home law rather than Singapore law, this guide names it and routes it to your home advisers; it does not answer it.

Three statutory fixtures, from day one.

Three statutory fixtures attach to every Singapore company from the day it exists. At least one director must be ordinarily resident in Singapore: a citizen, a permanent resident, or someone who meets ACRA's local residency rules. A company secretary must be appointed within six months of incorporation, must meet local residency requirements, and cannot be the same person as a sole director. And the registered office must be a Singapore address, open and accessible to the public for at least three hours on each business day during normal business hours.

The mechanics of registration are quick where the file is complete. The company name must be successfully reserved before registration is filed; ACRA's registration fee is S$300, with a separate name application fee. Most registrations are approved soon after payment; complex applications can take up to 15 working days, and applications needing approval from a referral authority take 14 to 60 days. Founders without Singpass access cannot file through Bizfile themselves; ACRA directs them to engage a corporate service provider in Singapore, which is why every foreign-owned incorporation has a local professional in the chain from the start.

REQUIREMENT	POSITION	NOTE
Resident director	At least one	Citizen, permanent resident, or meets ACRA's local residency rules
Company secretary	Within 6 months	Local residency required; cannot be the same person as a sole director
Registered office	Singapore address	Open to the public at least 3 hours each business day
Registration fee	S$300	Name application fee separate; name reserved before filing
Approval timing	Soon after payment	Complex cases up to 15 working days; referral-authority cases 14 to 60 days

REQUIREMENTS PER ACRA, VERIFIED JULY 2026. CURRENT ACRA REQUIREMENTS GOVERN.

None of these are obstacles; they are design inputs. Who takes the resident directorship, where the registered office sits, and how the secretary role is resourced are decisions that interact with tax residency, with the employer profile COMPASS will score in chapter 09, and with the audit and reporting calendar in chapters 07 and 08. The groups that struggle are the ones that treated formation as a checkout flow and met the design questions afterwards.

One rate, assessed one year in arrears.

Singapore taxes companies at a flat rate of 17 per cent of chargeable income, and it applies the same rate to local and foreign-owned companies alike. There is no separate rate for subsidiaries of overseas parents, no graduated stack, and no municipal layer. One rate, applied to chargeable income, assessed one year in arrears: the Year of Assessment 2026 taxes the income of the financial year that ended in 2025. That one-year lag is the first mechanical difference foreign finance teams meet, and it matters for provisioning, because the tax expense in this year's accounts settles against an assessment raised next year.

The second thing to understand is that the headline rate overstates what most companies actually pay. Exemption schemes and rebates change from one Year of Assessment to the next, and effective-rate planning should always be done against the current IRAS position rather than a remembered one.

The exemptions doing the work

Two standing schemes do most of the work. Under the partial tax exemption available to companies generally, 75 per cent of the first S$10,000 of normal chargeable income and 50 per cent of the next S$190,000 are exempt, a maximum of S$102,500 of income sheltered each year. Qualifying new companies can instead claim the start-up exemption for their first three consecutive Years of Assessment: 75 per cent of the first S$100,000 and 50 per cent of the next S$100,000, a maximum of S$125,000, before moving onto the partial exemption from the fourth year.

On top of the standing schemes, Singapore has in recent years granted a corporate income tax rebate in the annual Budget. For the Year of Assessment 2026 the rebate is 50 per cent of corporate tax payable, paired with a CIT Rebate Cash Grant of S$2,000 for active companies meeting a local-employee condition, with combined benefits capped at S$40,000. Rebates are Budget creatures; they change yearly and should be checked, not assumed.

SCHEME	RELIEF	CEILING
Partial exemption	75% of first S$10,000; 50% of next S$190,000	S$102,500 per YA
Start-up exemption	75% of first S$100,000; 50% of next S$100,000	S$125,000; first 3 YAs
YA 2026 rebate	50% of tax payable, plus S$2,000 cash grant	S$40,000 combined

SOURCE: IRAS, VERIFIED JULY 2026. REBATES AND EXEMPTIONS VARY BY YEAR OF ASSESSMENT; CURRENT IRAS POSITIONS GOVERN.

AN ILLUSTRATION, NOT YOUR NUMBER

A Singapore subsidiary with normal chargeable income of S$300,000 under the partial exemption shelters S$102,500, leaving S$197,500 taxable. At 17 per cent that is S$33,575 before any rebate, an effective rate of roughly 11.2 per cent on the full S$300,000.

The figures are round and hypothetical; the pattern is the point. For entities in the low hundreds of thousands of chargeable income, the effective rate sits meaningfully below the headline.

The filing calendar

Two corporate income tax filings recur every year. The Estimated Chargeable Income return is due within three months of the financial year end, unless the company qualifies for the filing waiver. The income tax return itself, Form C-S or Form C depending on the company's profile, is due by 30 November of the Year of Assessment. Between those two dates sits the real work: the computation, the treatment questions, and the reconciliation of the tax position to what the financial statements say.

A group that plans its Singapore filing calendar off the parent's fiscal rhythm rather than off these two dates tends to discover the mismatch under deadline. The risk is highest where the home cycle feels transferable; it is not. Chapter 08 assembles the Singapore dates into a single calendar.

What this means for provisioning

The one-year assessment lag deserves a specific mention in the group's provisioning process. The tax expense recognised in this year's Singapore accounts settles against an assessment raised next year, under whatever rebates and exemptions that Year of Assessment carries. Where the group's effective-rate model for Singapore was built in a prior year, rebuild it against the current IRAS position before it feeds the consolidated number.

Timing also matters at the other end of the entity's life. The start-up exemption is confined to a qualifying new company's first three consecutive Years of Assessment, which makes the timing of incorporation itself a planning input. Chapter 10 returns to sequencing.

Two figures in this chapter are Budget-cycle figures, checked against IRAS in July 2026: the Year of Assessment 2026 rebate and its cash grant. If you are reading this guide in a later year, treat them as a prompt to check the current position rather than as the position itself.

Not **VAT by another name.**

Singapore's goods and services tax runs at 9 per cent on standard-rated supplies made on or after 1 January 2024. Registration is compulsory on either of two tests. The retrospective test: taxable turnover in the past calendar year exceeded S$1 million, in which case the application must be made by 30 January of the following year, with registration effective 1 March. The prospective test: taxable turnover can reasonably be expected to exceed S$1 million in the next twelve months, in which case the application is due within 30 days of the forecast.

The prospective test is the one that catches growing foreign subsidiaries, because it turns on a signed contract or a credible pipeline, not on a year-end print. A regional sales hub that lands its first significant Asian contract can cross the forecast line the day the ink dries.

Voluntary registration below the threshold can make commercial sense for some businesses and is worth assessing rather than assuming.

Where home instincts mislead

Where foreign groups most often stumble is the assumption that GST behaves like the VAT they know at home. The instincts transfer just well enough to be dangerous, and the differences show up in the details that invoices turn on. None of them should be answered by analogy to home rules.

> THREE QUESTIONS BEFORE THE FIRST INVOICE
>
> How will exported services be treated? Do reverse-charge obligations arise on services the entity imports from the group? And what is the recovery position if the entity makes few taxable supplies of its own?
>
> Each is answerable, but ask them locally, before the billing model is fixed.

For the compliance calendar, note that the GST tests run continuously rather than annually. The registration question is asked of the past calendar year and of the rolling twelve-month forecast, whichever trips first, and the obligation does not wait for the year end that the rest of this guide counts from.

SOURCE: IRAS, VERIFIED JULY 2026. CURRENT IRAS POSITIONS GOVERN.

Every route home carries its own analysis.

Once a Singapore entity earns, the money has to move: dividends, royalties, interest, service and management fees. Each route out carries its own withholding tax analysis under Section 45 of the Income Tax Act, its own treaty position, and its own documentation burden. The rate depends on the character of the payment and on any treaty relief available, and the classification question is usually where the money is won or lost: the same cash flow described as a royalty, a service fee, or a cost reimbursement can carry three different withholding outcomes. Gross-up clauses in intercompany agreements quietly shift the economic cost of getting this wrong from the recipient to the payer, which is why the analysis belongs before the payment leaves the account rather than after.

The practical discipline is characterisation first: agree what each intercompany flow actually is, in the agreement and in the conduct, before asking what it suffers on the way out. Chapter 06 picks up the same theme, because the withholding file and the transfer pricing file describe the same flows and have to tell the same story.

> **WHY THIS GUIDE STATES NO WITHHOLDING RATES**
>
> Rates by payment category change, interact with any applicable treaty, and are exactly the kind of figure that dates a designed document. The current IRAS rates and any treaty in force between Singapore and the parent's jurisdiction govern any actual payment.
>
> This guide states the mechanism and routes the rest to a conversation.

The home landing

What happens when a dividend lands with the parent is a home-jurisdiction question, and this guide treats it as one. The parent country's treatment of distributions received from foreign subsidiaries turns on the group's own facts and on that jurisdiction's current rules, and it belongs with the group's home advisers. The productive move is sequencing: settle the Singapore withholding analysis and the home landing analysis together, before the dividend is declared, so that neither side's answer surprises the other.

Put one more question on the same agenda: whether your home jurisdiction operates a regime that attributes low-taxed foreign profits to the parent, and whether it sees a particular Singapore entity's profits. That is a question for the group's home advisers, asked at design time rather than at the first home filing afterwards. The value of naming it here is early warning, not an answer; this guide does not advise on any home jurisdiction's law. Chapter 11 works these questions through for one jurisdiction, the United Kingdom.

MECHANISM PER THE INCOME TAX ACT, SECTION 45. CURRENT IRAS RATES AND ANY APPLICABLE TREATY GOVERN.

The paper is **the defence.**

Singapore applies the arm's length principle, and IRAS expects related-party arrangements to be supported by documentation prepared to its requirements. Since the Year of Assessment 2019 the duty has statutory teeth: taxpayers meeting the prescribed conditions must prepare transfer pricing documentation under Section 34F of the Income Tax Act 1947. The documentation must be contemporaneous, built on the information available when the transactions were priced rather than reconstructed later, and it must be produced to IRAS within 30 days of a request and retained for at least five years. Failure on timing, content, production, or retention each carries a fine of up to S$10,000, and the quieter, larger cost is an adjustment defended from a thin file.

The main gateway condition is scale: documentation is required where gross revenue from the trade or business exceeds S$10 million for the basis period, with related-party transaction thresholds and specified exemptions beneath that. Whether a particular entity falls inside the mandatory rules, and what proportionate documentation looks like if it does not, is a factual assessment made against the current IRAS requirements rather than a one-line answer.

Arriving with a group policy

Foreign groups rarely arrive without a transfer pricing position; they arrive with a group policy written for the home tax authority. The Singapore exercise is translation, not invention: the local file has to turn that policy into positions IRAS will accept, and the two documents must tell the same story about the same flows. A local file that quietly contradicts the group policy invites questions from both authorities at once.

Build the file when the transactions are priced. The contemporaneous standard is not a filing formality; it fixes the evidential clock, and a file assembled two years later, for an arrangement that has since drifted, protects nobody.

MEDORA'S READ

The recurring weakness is not the pricing itself but the paper: intercompany agreements that describe an arrangement nobody follows, and benchmarking done once and never revisited. **Documentation that matches operational reality is the whole defence.**

XERXES J. MEDORA · MANAGING DIRECTOR

SOURCE: IRAS TRANSFER PRICING GUIDANCE, VERIFIED JULY 2026. CURRENT IRAS REQUIREMENTS GOVERN.

The group test decides the audit question.

The starting point in Singapore company law is that a company's financial statements are audited each year. The small company exemption then removes that obligation for private companies that meet at least two of three criteria for the immediate past two consecutive financial years: total annual revenue of S$10 million or less, total assets of S$10 million or less, and 50 employees or fewer. Corporate shareholders do not disqualify a company, and exempt private company status is not required. A newly incorporated private company, less than two years old, qualifies by meeting the criteria in the current financial year.

CRITERION	THRESHOLD	TEST
Revenue	S$10m or less	Meet at least two of the three criteria for the immediate past two consecutive financial years. Private companies only. Group companies are tested again on the consolidated group figures.
Total assets	S$10m or less	
Employees	50 or fewer	

CRITERIA PER ACRA, VERIFIED JULY 2026. THE CURRENT ACRA CRITERIA ALWAYS GOVERN.

The clause that decides it

For foreign-owned subsidiaries the group test is the clause that decides the outcome. A company that is part of a group qualifies only if the entire group, including foreign entities, meets at least two of the three criteria on a consolidated basis for the immediate past two consecutive financial years. A modest Singapore entity inside a foreign-headquartered group of any size will usually fail the group limb however small its own numbers are, which is why most foreign-owned subsidiaries audit even when the local figures look exempt.

MEDORA'S READ

If your Singapore entity is consolidated into a parent of any size, the working assumption should be that **an audit is required,** and the exemption analysis exists to confirm it rather than to escape it.

XERXES J. MEDORA · MANAGING DIRECTOR

Exemption from audit, where it is available, is narrower than it sounds. It is not exemption from financial reporting: the financial statements must still be prepared, and the filing requirements do not change. And many foreign-owned entities audit voluntarily even where exempt, because the group auditor, a bank condition, board preference, or sale-readiness asks for it.

> WHEN NOT TO BUY AN AUDIT
>
> Sometimes the assessment says the entity is exempt, nothing else asks for an audit, and the right answer is not to buy one this year. That answer costs a conversation, and a firm that gives it to you plainly is worth keeping.

One accounting world, two frameworks

Singapore-incorporated companies report under Singapore Financial Reporting Standards (International), and SFRS(I) standards are equivalent to IFRS Accounting Standards as issued by the IASB. For a group consolidating under IFRS, the Singapore statutory accounts and the group reporting pack are describing the same accounting world; the work is in the group instructions, the component materiality, and the timetable, not in reconciling two frameworks.

Where the parent reports under a national GAAP instead, a genuine mapping exercise exists. The Singapore entity's statutory numbers and its group-pack numbers can differ, recognition and measurement differences move with each framework's amendment cycle, and someone has to own the bridge. The clean pattern is a documented mapping prepared once a year, inside the reporting calendar, rather than ad hoc journal heroics at consolidation. Chapter 11 shows how this seam runs for one national GAAP, the UK's FRS 102.

Where Medora sits in this

Medora acts as component auditor for Singapore entities of parents in the UK, US, EU, Japan, and Korea, works to group instructions from overseas group auditors, and prepares reporting packs, with framework experience running from SME statutory accounts to listed multinational groups under IFRS and US GAAP. Where the group's advisers sit within DFK International or LEA Global member firms, the coordination is already warm.

The year counts forward from year end.

The Singapore compliance year counts forward from the financial year end. For non-listed companies, the annual general meeting falls due within six months of financial year end, and the annual return must be filed with ACRA within seven months. A private company that sends its financial statements to members within five months of year end can be exempted from holding an AGM under one of the routes Section 175A of the Companies Act provides, with member safeguards preserved, including the right to require a meeting.

What gets filed, and how

Financial statements are filed with ACRA as part of the annual return unless an exemption applies. Smaller and non-publicly-accountable companies file in simplified XBRL; others file full XBRL; a small set of company types file a PDF copy instead under ACRA's rules on filing modes. A solvent exempt private company does not need to file financial statements with its annual return at all; it makes an online declaration of solvency instead. That carve-out is worth a foreign reader's attention chiefly so it can be set aside: a wholly owned subsidiary of a corporate parent can never be an exempt private company, so the solvent-EPC route is not available to the groups this guide addresses.

The register of registrable controllers

Alongside the ACRA cycle runs the register of registrable controllers: a private register recording the individuals and entities that ultimately own or control the company, kept at the registered office or the corporate service provider's office, with changes lodged to ACRA's central register within two business days and same-day setup for entities incorporated from 16 June 2025. For a foreign-owned subsidiary the analysis is done under Singapore rules, on Singapore timelines, however familiar the underlying ownership questions feel from home.

Layered onto the ACRA cycle run the IRAS dates from chapter 03, the Estimated Chargeable Income return within three months of year end and the income tax return by 30 November, and the GST tests from chapter 04, which do not wait for year end at all.

DEADLINES PER ACRA AND IRAS, VERIFIED JULY 2026. CURRENT POSITIONS GOVERN; LISTED COMPANIES AND VCCS RUN ON DIFFERENT TIMELINES.

Assembled in one place, and counted forward from a 31 December year end, the year looks like this. The dates below are an illustration built on the current deadlines; 31 December is the worked example, and every date shifts with the year end your group actually sets.

DATE	OBLIGATION	BASIS
31 March	Estimated Chargeable Income filed with IRAS	Within 3 months of year end, unless the waiver applies
31 May	Financial statements sent to members	Within 5 months, where the s175A AGM exemption route is used
30 June	AGM held, if one is held	Within 6 months of year end
31 July	Annual return filed with ACRA	Within 7 months of year end
30 November	Income tax return, Form C-S or Form C	Fixed date in the Year of Assessment

ILLUSTRATION ON A 31 DECEMBER YEAR END. DEADLINES PER ACRA AND IRAS, VERIFIED JULY 2026; CURRENT POSITIONS GOVERN.

Two working notes. The calendar above is the statutory frame, not the workload: the financial statements that reach members by 31 May have to be prepared, and where chapter 07 concluded an audit is needed, audited, well before that date, so the real timetable is set by the audit and the group reporting pack rather than by the filing deadlines. And the continuous obligations, the controllers register and the GST tests, do not appear on it at all; they run on their own clocks.

The calendar also has to coexist with the parent's own. The Singapore cycle, the group audit timetable, and the home filing deadlines pull on the same finance team in the same months. The groups that find this easy are the ones that put both calendars on one page and resourced the overlap deliberately; the discipline is unglamorous, and it works.

A first-year note: the company's first financial year end is a design choice with consequences that run through this whole calendar, from when the first Estimated Chargeable Income return falls due to how the start-up exemption years land. Set it deliberately at formation, with the group's reporting calendar in view, rather than by default.

Two stages, two cutovers, **one framework.**

The Employment Pass is the Ministry of Manpower's pass for foreign professionals, managers, executives, and technicians, and eligibility runs in two stages: a minimum qualifying salary, then COMPASS, a points framework assessed alongside it. Both stages matter to a foreign group, because the first is about the candidate and the second is, in meaningful part, about the employer.

First, the salary floor. For applications lodged before 1 January 2027, the floor is S$5,600 a month for all sectors except financial services, rising progressively with age from 23 to S$10,700 at 45 and above; financial services candidates need S$6,200, rising to S$11,800. From 1 January 2027 the scales step up: S$6,000 rising to S$11,500 for the general track, and S$6,600 rising to S$12,700 for financial services. The age gradient is the detail that catches planning: the floor for a seasoned executive sits close to double the entry figure.

TRACK	APPLICATIONS BEFORE 1 JAN 2027	FROM 1 JAN 2027
General	S$5,600 → S$10,700 at 45+	S$6,000 → S$11,500
Financial services	S$6,200 → S$11,800 at 45+	S$6,600 → S$12,700

SOURCE: MINISTRY OF MANPOWER ELIGIBILITY CRITERIA, VERIFIED JULY 2026. THE CURRENT MOM CRITERIA ALWAYS GOVERN.

The renewal cutover

The renewal cutover runs a year behind the application cutover, and getting it right matters. The current scales apply to renewals of passes expiring before 1 January 2028; the higher scales apply to renewals of passes expiring on or after that date. A pass granted in 2026 is renewed against the criteria in force at renewal, not the criteria it was granted under, so a salary set exactly at today's floor is a renewal conversation waiting to happen.

COMPASS scores the employer too

Second, COMPASS, the Complementarity Assessment Framework. Applications must earn 40 points across foundational criteria covering salary, qualifications, workforce diversity, and support for local employment, with bonus criteria available for skills shortages and strategic economic priorities. The framework scores attributes of the employer as well as the candidate. MOM publishes the criteria in full, and the published tables govern; this guide deliberately reproduces no points tables.

Applications are employer-sponsored, and employers must show they have fairly considered the local market, including advertising requirements.

MEDORA'S READ

> COMPASS scores the employer as well as the candidate. Plan the country manager's pass **alongside the entity design,** not after it; a newly formed subsidiary's employer profile is part of the score.
>
> XERXES J. MEDORA · MANAGING DIRECTOR

Above and beside the EP

Above the EP sits the Overseas Networks and Expertise Pass for senior movers. It asks for a fixed monthly salary of at least S$30,000, either earned over the twelve consecutive months before application with an established employer, one with a market capitalisation of at least US$500 million or annual revenue of at least US$200 million, or committed by a Singapore-based employer for a role starting within six months. An alternative route exists for outstanding achievement in sport, arts and culture, or academia and research. A Tech.Pass also exists for senior technology talent; its criteria are MOM's to state and are not reproduced here.

A scope note in the same spirit as the rest of this guide: pass criteria, timelines, and fees are MOM's, and the current published criteria decide every application. Medora's work sits around the move rather than in the application: the entity design the employer profile rests on, the tax residency of the individual and the company, and the group setup the hire lands into. Those are conversations worth having before anyone resigns at head office.

SOURCE: MINISTRY OF MANPOWER ELIGIBILITY CRITERIA, VERIFIED JULY 2026. THE CURRENT MOM CRITERIA ALWAYS GOVERN.

The first two years, in order.

Almost everything in this guide compresses into a sequence, and the sequence has an order for a reason. Design comes first: who takes the resident directorship, where the registered office sits, how the secretary role is resourced, what the first financial year end should be, and who the first hire will be. Each of those decisions interacts with something later, the company's tax residency, the employer profile COMPASS will score, and the audit and reporting calendar, and each is cheaper as a design input than as a repair.

Timing matters more than it looks. The Singapore decision usually lands late in the group's planning cycle, and the Singapore calendar rewards incorporating early in the financial year the group wants operations to start, because the first-Year-of-Assessment positioning, the first hire's pass, and the banking file all queue behind formation.

The first year is then administrative in the best sense. The name is reserved and the company registered; the controllers register is set up; the GST tests start running the moment revenue is credible; the intercompany agreements are put in place and the transfer pricing file built when the transactions are priced, not later; and the first Estimated Chargeable Income return falls due three months after the first year end closes.

The second year is when the pattern locks. The audit question from chapter 07 is settled against real numbers, remembering that a newly incorporated company is tested on its current financial year until two consecutive years exist, and that the group test usually decides the answer anyway. The first income tax return lands by 30 November of the Year of Assessment. And the first renewal of a pass expiring on or after 1 January 2028 is assessed against the higher salary scales, a fact to plan salaries around rather than discover.

THE ONE-PAGE TEST

If the entity's year cannot be written on one page, every condition, deadline, and owner named, the setup is not finished. The page is not bureaucracy; it is the proof the design works.

One corridor, worked in full.

Every foreign-headquartered group runs a set of corridor-level questions alongside the Singapore rules in this guide: what any tax treaty between home and Singapore actually does, how the home accounting framework meets SFRS(I), and how home law treats the Singapore entity's profits. This chapter works those questions through for one home jurisdiction, the United Kingdom, as a worked example of the shape they take. The same questions arise for every other home jurisdiction, and their answers belong with your own advisers in that jurisdiction.

MEDORA'S READ

The expensive mistake in this corridor is treating Singapore as **the UK with sunshine.** The similarity is real, and it is exactly why groups skip local advice until the first IRAS query.

XERXES J. MEDORA · MANAGING DIRECTOR

The treaty relationship

The UK and Singapore have run a full double taxation agreement for decades. The 1997 UK-Singapore Double Taxation Agreement entered into force on 19 December 1997, taking effect in Singapore from 1 January 1999 and in the UK from 1 April 1998 for corporation tax and 6 April 1998 for income tax and capital gains tax. It has been amended twice, by a 2010 protocol in force from 8 January 2011 and a second protocol in force from 27 December 2012, and it now operates through the synthesised text incorporating the Multilateral Instrument. HMRC publishes all of these in full.

What the treaty means in practice for a UK group is less about any single rate and more about architecture: it settles which country taxes what, provides the tie-breaker when residency is contested, disciplines withholding on cross-border flows, and gives both revenue authorities a mutual agreement procedure when they disagree. The working consequence is that a UK-Singapore structure rests on negotiated, published rules, and that stability is itself a planning asset.

This guide deliberately states no treaty rates and no article numbers. Rates and article-level mechanics belong to the treaty text as it stands when a payment is made, read on your facts by people qualified to read it. Chapter 05 applied the same discipline to withholding tax.

TREATY DATES PER HMRC AND GOV.UK, VERIFIED JULY 2026. THE TREATY TEXT AND CURRENT HMRC GUIDANCE GOVERN.

The personal backdrop has moved

The UK personal tax backdrop shifted on 6 April 2025: the remittance basis for non-UK domiciled individuals ended, and domicile was replaced as a connecting factor by a residence-based system. In its place sits the four-year foreign income and gains regime, available to qualifying new residents in their first four years of UK residence after at least ten consecutive years of non-UK residence, alongside a temporary repatriation facility for previously unremitted amounts. HMRC publishes the detail.

For this guide the point is directional. The corridor now runs both ways: UK groups still send executives out to Singapore, and Singapore has become more interesting to internationally mobile UK-connected individuals precisely because UK residence now prices worldwide income sooner. Individual positions turn on personal circumstances, and the UK side of them belongs with your UK adviser. Medora's capability here is the Singapore side: the tax residency of companies and individuals, and treaty relief.

The reporting seam: FRS 102 and SFRS(I)

A UK group consolidates under either UK-adopted international accounting standards or UK GAAP, most commonly FRS 102 for private groups. Under UK-adopted international accounting standards, chapter 07's reading applies unchanged: one accounting world, operational work. Where the group reports under FRS 102, the Singapore entity's statutory numbers and its group-pack numbers can genuinely differ, recognition and measurement differences move with each framework's amendment cycle, and someone has to own the bridge: a documented mapping prepared once a year, inside the reporting calendar, rather than ad hoc journal heroics at consolidation.

The home-side questions

What happens when a dividend lands in the UK parent is a UK question. The UK's treatment of distributions received from foreign subsidiaries turns on the group's own facts and on current HMRC rules, and it belongs with the group's UK advisers, settled together with the Singapore withholding analysis before the dividend is declared. UK groups should put the controlled foreign companies regime on the same agenda: it exists to attribute certain low-taxed foreign profits to the UK, and whether it sees a particular Singapore entity's profits is a question for the group's UK advisers, asked at design time rather than at the first UK filing afterwards. This guide does not advise on UK law. The transfer pricing translation in chapter 06 also has its UK shape: the group policy a UK reader brings is usually written for HMRC, and the Singapore local file has to tell the same story about the same flows.

Read as a worked example, the pattern is the point. Every home jurisdiction brings its own treaty position, its own accounting seam, and its own rules for foreign profits. Ask the same three questions of your own corridor, with your own advisers, at design time.

TREATY AND PERSONAL-TAX FRAMING PER HMRC AND GOV.UK, VERIFIED JULY 2026. CURRENT HMRC GUIDANCE GOVERNS.

Built for **foreign headquarters.**

JK Medora PAC is a partner-led Singapore practice of ACRA-registered Public Accountants, established in 1978 and built around foreign-owned Singapore entities: subsidiaries, regional headquarters, and family office vehicles whose parents and principals sit in the UK, US, EU, Japan, and Korea. The entities this guide describes are the firm's home ground.

On the technical spine of this work, the firm acts as component auditor for Singapore entities of overseas parents, works to group instructions from overseas group auditors, and prepares reporting packs, with framework experience from SME statutory accounts to listed multinational groups under IFRS and US GAAP. On tax, the practice works as the HQ tax function's reliable local counterpart, translating group policy into positions IRAS will accept.

The firm is a member of DFK International, an association of independent accounting firms and business advisers with over 200 member firms, over 430 offices, and a presence in over 85 countries, and of LEA Global, which counts over 140 members and more than 20,000 professionals and describes itself as the fourth largest accounting association in the world. Both associations publish their member directories openly. Network membership is not a licence and not a regulatory status; Medora's regulatory standing rests on its ACRA registration. What it does mean is that where the group's advisers sit within DFK or LEA member firms, the coordination is already warm.

This guide has given the firm's judgement at four points in Xerxes J. Medora's voice. He leads the practice as Managing Director, is a Fellow of the Institute of Chartered Accountants in England and Wales, admitted 2003, a Fellow of the Institute of Singapore Chartered Accountants, admitted 2012, and an ACRA registered Public Accountant. The tax department is led by Charanjit Kaur, Senior Tax Manager, with more than 30 years of international tax experience across Big 4 and mid-tier international firms.

If this guide has done its work, some readers now need nothing more than it: the entity is set up correctly, the calendar is on one page, and the year is running. For the rest, the next step is a conversation with a partner, through the website, on your facts. This guide makes no promises about fees, timelines, or outcomes, because documents cannot know your facts; conversations can.

HOW TO REACH MEDORA

The next step is **a conversation.**

Enquiries reach the firm through the website. The first conversation is with a partner, not a business development team.

OFFICE	22 Malacca Street RB Capital Building, #03-02 Singapore 048980
CONTACT	www.jkmedora.com.sg/contact

MEDORA

SINGAPORE MEMBER FIRM OF DFK INTERNATIONAL, AN ASSOCIATION WITH MORE THAN 430 OFFICES IN OVER 85 COUNTRIES, AND OF LEA GLOBAL