

Advance Tax Ruling (“ATR”)

May 2024

Singapore has an advance ruling system for **Income Tax** and **Goods and Services Tax (“GST”)** to promote clarity and consistency regarding the application of the tax law.

Under the advance ruling system, taxpayers can apply to the **Inland Revenue Authority of Singapore (“IRAS”)** to issue a written interpretation on how the provisions of the **Income Tax Act** or **GST Act** apply to a particular business arrangement or a specific transaction.

An ATR binds the IRAS to apply the relevant provisions of the Income Tax Act or GST Act in the manner that was set out in the ruling, which provides taxpayers with greater certainty regarding their potential tax liabilities, and minimises the risks of tax disputes.

To obtain an ATR from the IRAS, taxpayers are required to submit an application form, a written ruling request detailing the particular business arrangement or specific transaction, and a nonrefundable application fee. During the application review process, the IRAS may raise queries or request additional information. Other fees (for e.g., time-based fees, additional fees, and reimbursement fees) may also be charged by the IRAS throughout the application process.

How Baker Tilly can assist

- We can assist to apply for ATR to seek certainty on the adequacy of economic substance under section 10L of the Income Tax Act, analyse the transaction/arrangement, and advise if an ATR application is appropriate.
- We can assist with the preparation and submission of the ATR application form and the written ruling request.
- We can assist to respond to any queries from the IRAS following the submission of the ATR application form and the written ruling request.
- If you have given consent for the publication of a summary of the ATR, we can also assist to review the summary of the ATR before the publication by the IRAS.

Contact us

If you are considering an ATR application, or would like to learn more about Baker Tilly’s services, please do not hesitate to contact any of the individuals listed below.

Income Tax		GST
Sim Siew Moon Head of Tax T: 6393 3012 E: siewmoon@bakertilly.sg	Bernard Yu Partner, Tax T: 6393 3013 E: bernard.yu@bakertilly.sg	Yvonne Chua Partner, GST, Tax T: 6393 3014 E: yvonne.chua@bakertilly.sg
Alena Wan Senior Manager, Tax T: 6393 3116 E: alena.wan@bakertilly.sg	Pang Xin Hui Senior Manager, Tax T: 6393 3119 E: xinhui.pang@bakertilly.sg	Amy Sim Senior Manager, GST, Tax T: 6393 3133 E: amy.sim@bakertilly.sg