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**FACTSHEET - TAX TREATY BETWEEN:
SINGAPORE AND SWITZERLAND**

Key words: Tax Treaty, Singapore, Switzerland
Key articles: 2, 5, 6, 8, 12, and 14
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Key elements:

Entry into force:	1st of August 2012
Applicable as of:	1st of January 2013
Replaces:	The Singapore - Switzerland Income and Capital Tax Treaty (1975)
Languages:	Concluded in German and English, each text having equal authenticity

Withholding rates:

Dividends:	15% or 5% if the beneficial owner is a company having a qualified participation equaling at least 10% of the capital of the company paying the dividend;
Interest:	5% (subject to exceptions); and
Royalties:	5%

Key deviations from the OECD Model:

Art. 2 (Taxes covered) – No relief for taxes withheld at source on prizes in a lottery;

Art. 5 (Permanent establishments) – Services and consultancy services for the same or connected project for more than 300 days in a 12-month period trigger a service PE;

Art. 6 (Income from immovable property) – Applies equally to income from immovable property used for the performance of independent personal services (Art. 14);

Art. 8 (Shipping and air transport) – Profits derived from the operation of ships or aircraft in international traffic include: profits from the rental of the ships and aircraft on a bareboat basis; profits from the use, maintenance or rental of containers (including trailers and related equipment) for the transport of goods and merchandise; and interest that incidentally arises on funds connected with the operation of the ships and aircraft;

Art. 12 (Royalties) – The definition of "royalties" includes *inter alia*: films and tapes for radio or television broadcasting; and computer software;

Art. 14 (Independent personal services) – Consistent with the Swiss practice and in line with the UN Model Convention (2001)

Relief mechanism from double taxation:

Singapore:	Credit method (generally)
Switzerland:	Exemption method

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