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**No. S 748**

INCOME TAX ACT 1947

INCOME TAX (FRASERS COMMERCIAL  
INVESTMENTS NO. 1 PTE. LTD., ETC. —  
SECTION 13(12) EXEMPTION)  
ORDER 2022

ARRANGEMENT OF PARAGRAPHS

Paragraph

1. Citation
  2. Exemption
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In exercise of the powers conferred by section 13(12) of the Income Tax Act 1947, the Minister for Finance makes the following Order:

**Citation**

1. This Order is the Income Tax (Fraser's Commercial Investments No. 1 Pte. Ltd., etc. — Section 13(12) Exemption) Order 2022.

**Exemption**

2.—(1) Trust distribution income from Central Park Landholding Trust (a trust constituted in Australia), received in Singapore by Fraser's Commercial Investments No. 1 Pte. Ltd. (a company incorporated in Singapore) on or after 16 September 2020 from APF Management Pty Limited (a company incorporated in Australia) in its capacity as the trustee of Central Park Landholding Trust, is exempt from tax.

(2) Dividend income received in Singapore by British & Malayan Trustees Limited (a company incorporated in Singapore) in its capacity as the trustee of Fraser's Commercial Trust (a trust constituted in Singapore) on or after 16 September 2020 from Fraser's Commercial Investments No. 3 Pty Ltd (a company incorporated in the Cayman Islands), is exempt from tax.

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(3) Dividend income received in Singapore by Frasers Commercial Sub No. 2 Pte. Ltd. (a company incorporated in Singapore) on or after 16 September 2020 from Frasers Commercial Investments No. 3 Pty Ltd, is exempt from tax.

(4) Interest income received in Singapore by British & Malayan Trustees Limited in its capacity as the trustee of Frasers Commercial Trust, on or after 16 September 2020 from Frasers Commercial Investments No. 3 Pty Ltd, is exempt from tax.

(5) Interest income received in Singapore by Frasers Commercial Sub No. 2 Pte. Ltd. on or after 16 September 2020 from Frasers Commercial Investments No. 3 Pty Ltd, is exempt from tax.

(6) Dividend income received in Singapore by Frasers Commercial Sub No. 4 Pte. Ltd. (a company incorporated in Singapore) on or after 16 September 2020 from Frasers Commercial Investments No. 4 Pty Ltd (a company incorporated in the Cayman Islands), is exempt from tax.

(7) Interest income received in Singapore by Frasers Commercial Sub No. 4 Pte. Ltd. on or after 16 September 2020 from Frasers Commercial Investments No. 4 Pty Ltd, is exempt from tax.

(8) Dividend income received in Singapore by Frasers Commercial (UK) Sub. 1 Pte. Ltd. (a company incorporated in Singapore) on or after 16 September 2020 from Farnborough Business Park Ltd (a company incorporated in Jersey), is exempt from tax.

(9) Interest income received in Singapore by Frasers Commercial (UK) Sub. 1 Pte. Ltd. on or after 16 September 2020 from Farnborough Business Park Ltd, is exempt from tax.

(10) Interest income received in Singapore by British & Malayan Trustees Limited in its capacity as the trustee of Frasers Commercial Trust on or after 15 October 2020 from Frasers Commercial Investments No. 4 Pty Ltd, is exempt from tax.

(11) The exemptions in sub-paragraphs (1) to (9) are subject to the conditions specified in the letter from the Ministry of Finance dated 16 September 2020 addressed to EY Corporate Advisors Pte. Ltd.

(12) The exemption in sub-paragraph (10) is subject to the conditions specified in the letter from the Ministry of Finance dated 15 October 2020 addressed to EY Corporate Advisors Pte. Ltd.

Made on 15 September 2022.

LAI WEI LIN  
*Second Permanent Secretary,  
Ministry of Finance,  
Singapore.*

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