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INCOME TAX ACT
(CHAPTER 134)

INCOME TAX
(CROMWELL SG SPV 5 PTE LTD —
SECTION 13(12) EXEMPTION) ORDER 2021

ARRANGEMENT OF PARAGRAPHS

Paragraph

1. Citation
 2. Exemption
The Schedule
-

In exercise of the powers conferred by section 13(12) of the Income Tax Act, the Minister for Finance makes the following Order:

Citation

1. This Order is the Income Tax (Cromwell SG SPV 5 Pte. Ltd. — Section 13(12) Exemption) Order 2021.

Exemption

2.—(1) Income comprising dividends and interest described in sub-paragraph (2), that is received in Singapore by Cromwell SG SPV 5 Pte. Ltd. on or after 30 November 2017 from Cromwell EREIT Lux 5 S.a r.l. (a company incorporated in Luxembourg), is exempt from tax.

(2) Sub-paragraph (1) applies to distribution income received by Cromwell EREIT Lux 5 S.a r.l. from Cromwell Europa 1 and Cromwell Europa 2 which are real estate investment funds constituted in Italy, out of the rental and property-related income (including capital gains) of Cromwell Europa 1 and Cromwell Europa 2 from any of the properties specified in the Schedule.

(3) The exemption under sub-paragraph (1) is subject to the conditions specified in the letter of approval dated 8 May 2020 addressed to EY Corporate Advisors Pte. Ltd.

THE SCHEDULE

Paragraph 2(2)

<i>Name of property</i>	<i>Address of property in Italy</i>
1. Padova	Via Brigata Padova no. 19
2. Pescara	Via Salaria Vecchia no. 13, Pescara
3. Saronno	Via Varese no. 23, Saronno
4. Bari Europa	Viale Europa no. 95, Bari
5. Lissone	Via Madre Teresa di Calcutta no. 4, Lissone
6. Rutigliano	Strada Provinciale Adelfia, Rutigliano
7. Mestre	Rampa Cavalcavia no. 16/18 Mestre
8. Cuneo	Corso Annibale di Santa Rosa no. 15, Cuneo
9. Firenze	Via della Fortezza 8, Florence
10. Milano Nervesa	Via Nervesa no. 21, Milan
11. Assago	Via Milanofiori no. 1, F7-F11, Assago
12. Roma Pianciani	Via Pianciani no. 26, Rome
13. Roma Amba Aradam	Via dell'Amba Aradam no. 5, Rome
14. Via Guglielmo Jervis 13	Via Guglielmo Jervis 13, Ivrea
15. Bari Trieste	Corso Lungomare Trieste 23, Bari
16. Genova	Via Camillo Finocchiaro Aprile 1, Genova
17. Agrate	Via Paracelso 22-24-26
18. Milano Piazza Affari	Piazza Affari 2, Milan

Made on 14 August 2021.

TAN CHING YEE
*Permanent Secretary,
Ministry of Finance,
Singapore.*

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