

**APPLICATION FOR EXEMPTION FROM WITHHOLDING
TAX ON INTEREST PAYABLE ON A FOREIGN LOAN**

APPLICATION FORM

**MINISTRY OF FINANCE
100 HIGH STREET
#06-03 THE TREASURY
SINGAPORE 179434**

INSTRUCTIONS

1. To assist us in evaluating your application expeditiously, please provide the information requested as completely as possible. If space is insufficient, a separate sheet may be used. You should use this form as a format for your application.
2. All information given will be held in the strictest confidence. Where information is not yet available or inapplicable, please indicate accordingly.
3. This form will take approximately 20 minutes to complete if you have all the following information on hand as follows:
 - Particulars of the company;
 - Details of the loan agreement; and
 - Reasons to support your application.
4. A copy of this application and two copies of the loan agreement, the swap agreement and/or contract (if available) should be sent to the Permanent Secretary, Ministry of Finance, 100 High Street #06-03, The Treasury, Singapore 179434. The relevant documents accompanying the application should be in English.

SECTION I - GENERAL

A. Name and Address of Applicant _____

_____ Tel No: _____

B. Name and Address of Officer/Representative for contact purposes:

_____ Tel No: _____

Designation: _____

C. Exemption requested under: (Please tick)

Section 13(4) of the Income Tax Act _____

Double Taxation Agreement _____

SECTION II - PARTICULARS OF FOREIGN LOAN

A. LOAN FACILITY

1. Type of Financing: _____

2. Give brief description of the financing structure and state the benefits/savings arising from such an arrangement. Also attach a schematic presentation of it, if available: _____

3. Parties related to the loan facility

(a) Arranger: _____

(b) Swap Counterparties (if applicable): _____

(c) Funding banks: _____

(d) Indicate whether any of (a), (b) or (c) is related to the lender:

B. BORROWER

1. Name and Address: _____

2. Nature of Business: _____

3. (a) If a Pioneer Industry,
Pioneer period from _____ to _____

(b) If an Export Enterprise,
Export period from _____ to _____

(c) If an Expansion Enterprise,
Expansion period from _____ to _____

(d) Any others (please specify the period)

4. (a) Date of Registration : _____

(b) Date of Incorporation: _____

(c) Company Registration Number: _____

(d) Tax Reference Number: _____

5. Capital Structure of Company

Authorised Capital : _____

Issued Capital : _____

Paid-Up Capital : _____

Capital Reserve : _____

6. If Company is one of a group of affiliated companies, give a brief description of the group and the Company's relation to it:

C. LENDER

1. Name and Address: _____

2. Nature and Business: _____

3. If lender has equity participation in the borrowing company, give details of its shareholdings and the percentage of its shareholdings in relation to the total share capital:

D. FOREIGN LOAN

1. Amount (in foreign currency) : _____
(in Singapore currency) : _____

2. In cases where the lender obtains funds externally, state the source of such funds (ie whether from parent company, financial institution or vendor/supplier):

3. Purpose of loan (give details of how the loan is to be utilised):

4. In cases where the loan is utilised for the purchase of a ship, state the name and address of the company that will be managing its operations and the country in which the ship will be registered (Attach a copy of the Ship Registration Certificate, if available):

5. Terms and Conditions of Loan

(a) Rate of interest per annum: _____

(b) Draw down dates of the loans: _____

(c) Loan period: _____

(d) Repayment period: _____

(e) Terms of repayment (if grace period is granted, please specify):

(f) Tax incidence (whether on lender or borrower):

(g) Other principal terms and conditions of loan agreement:

(h) Cash flow schedule should be attached. Please see Annex I.

6. State whether the foreign country provides:

(a) tax credit if no tax exemption is given by Singapore

(b) tax sparing credit if exemption is given by Singapore

7. Date of signing of the loan agreement: _____

SECTION III

A. In cases where the company is applying for, or already enjoying other tax incentives, please state the name of the incentive(s) and specify the period(s):

B. Please state the reasons why the application should merit favourable consideration:

C. We undertake that the particulars stated above and the accompanying information are true and that we have disclosed all material information relating to the transaction. We also undertake that should there be any significant changes in the actual transaction, we will abide by your reassessment of the approval granted to our earlier application.

D. Should early termination or full redemption of the loan take place, we will undertake to inform your office immediately.

Date

Signature of Applicant

Name (In Block Letters) and
Position in Company

Company

CASH FLOW SCHEDULE

| Date + | Loan Drawdown | Principal Repayment | Interest Payment | Fees * |
|---------------|----------------------|----------------------------|-------------------------|---------------|
| | | | | |
| Total | | | | |

+ Approximate date if exact date is not available.

* Refers to all fees payable in connection with the loan eg. Legal fees, arrangement fees, commitment fees and guarantee fees.