

CHAPTER 3

INCOME AND DEEMED INCOME

§3-100 Summary checklist

• It is important to distinguish revenue receipts from capital receipts as only revenue receipts are taxable in Singapore.	§3-101
• Section 10(1) of the Income Tax Act (ITA) determines the scope of taxation in Singapore.	§3-102
• Certain "badges of trade" are taken into consideration to determine whether a person is carrying on a trade.	§3-103
• Trading profits are sourced in Singapore if trading activities are carried on in Singapore or if a permanent establishment (PE) is established.	§3-104
• A PE is a fixed place where a business is wholly or partly carried on.	§3-105
• It is important to distinguish between income derived from a profession and income derived from an employment.	§3-106
• "Gains or profits from any employment" includes any payment, whether in cash or in kind, made in respect of employment.	§3-108
• Gains or profits from stock option.	§3-109
• Section 12 of the ITA deems certain income as being derived from Singapore.	§3-114
• Exempt income is income chargeable to tax under s. 10(1) of the ITA but is exempt under other provisions of the ITA.	§3-115
• Exemption of gains or profits from disposal of ordinary shares.	§3-116
• Exemption of certain payments received in connection with COVID-19 events.	§3-117

§3-101 Revenue receipts v capital receipts

In Singapore, capital gains are not taxable. Accordingly, it is important to distinguish revenue receipts from capital receipts as only revenue receipts are taxable. It is often difficult to make the distinction and the following concepts are sometimes used:

- **Tree v fruit concept**
Capital is an asset from which income is produced. For example, a house is capital and the rental income derived from the letting of the house is revenue. Money that you deposit into a bank is capital whereas the interest that you earn is revenue. This can be likened to a tree and its fruits. Capital receipts are often seen as the tree which produces the fruits, i.e. the revenue receipts. Even after the fruits have been picked, the tree still exists.
- **Fixed v circulating capital**
Fixed capital, e.g. plant and machinery, is used in the business to produce income and any receipt from the sale of fixed capital is a capital receipt. For example, the proceeds from the sale of plant and machinery are capital receipts. Circulating capital arises from assets which are continuously being "circulated" in the ordinary course of business, e.g. stocks being sold or raw materials used in the manufacture of products that are being sold. Any receipt arising from the sale of circulating capital is a revenue receipt. For example, the proceeds from the sale of goods are revenue receipts.
- What is fixed capital for one business may be circulating capital for another. For example, the proceeds from the sale of a van would be capital receipts for a manufacturing company as the van is its fixed asset; while, for the vehicle distributor, it would be revenue receipts as it is in the business of selling vans.

While the above concepts are useful, it is sometimes necessary to refer to case law which has resulted in the following general rules:

- Payments for the sale of assets of a business are *prima facie* capital receipts.
- Payments received for the destruction of a profit-making apparatus are receipts of a capital nature. For example, you have signed a contract with Fashion Cafe for the franchise in Singapore. Subsequently, the contract was terminated and you were compensated with a sum of money.

§3-101

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