

No. S 871**INCOME TAX ACT 1947****INCOME TAX
(NTT DC REIT — SECTION 13(12)
EXEMPTION) ORDER 2025****ARRANGEMENT OF PARAGRAPHS****Paragraph**

1. Citation
 2. Exemption for NTT DCR Singapore 3 Pte. Ltd.
 3. Exemption for NTT DCR Singapore 4 Pte. Ltd.
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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 (NTT DC REIT — Section 13(12) Exemption) Order 2025.

Exemption for NTT DCR Singapore 3 Pte. Ltd.

2.—(1) Interest income described in sub-paragraph (2) received in Singapore by NTT DCR Singapore 3 Pte. Ltd. (a company incorporated in Singapore) on or after 14 July 2025 from NTT DCR US REIT, LLC (a company incorporated in the United States of America) (called in this paragraph NTT-US), from any of the following loans, is exempt from tax:

- (a) the loan granted by NTT DCR Singapore 3 Pte. Ltd. to NTT-US to fund its acquisition of ownership interests in the following companies incorporated in the United States of America:
 - (i) NTT Global Data Centers VA2, LLC;
 - (ii) NTT Global Data Centers CA1-3, LLC;

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- (b) any loan granted by NTT DCR Singapore 3 Pte. Ltd. to NTT-US on or after 14 July 2025 for the purpose of funding its working capital or capital expenditure in respect of any of the properties specified in sub-paragraph (3).
- (2) Sub-paragraph (1) applies to interest income originating from —
- (a) any rental and property-related income (including capital gain derived from divestment of property) from any of the properties specified in sub-paragraph (3);
- (b) any interest income derived from any temporary deposit with a financial institution in the United States of America of the income mentioned in sub-paragraph (a); and
- (c) any gain from the disposal of any ownership interest in any of the following companies:
- (i) NTT Global Data Centers VA2, LLC;
- (ii) NTT Global Data Centers CA1-3, LLC.
- (3) For the purposes of sub-paragraphs (1) and (2), the properties are the following:
- (a) the property named “CA1”, located at 1200 Striker Avenue, Sacramento, CA 95834, United States of America;
- (b) the property named “CA2”, located at 1312 Striker Avenue, Sacramento, CA 95834, United States of America;
- (c) the property named “CA3”, located at 1625 West National Drive, Sacramento, CA 95834, United States of America;
- (d) the property named “VA2”, located at 44610 Guilford Drive, Ashburn, VA 20147, United States of America.
- (4) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 20 June 2025 that is issued on behalf of the

Minister for Finance and addressed to EY Corporate Advisors Pte. Ltd.

Exemption for NTT DCR Singapore 4 Pte. Ltd.

3.—(1) Dividend income described in sub-paragraph (2) received in Singapore by NTT DCR Singapore 4 Pte. Ltd. (a company incorporated in Singapore) on or after 14 July 2025 from NTT Global Data Centers EMEA AT GmbH (a company incorporated in Austria), is exempt from tax.

(2) Sub-paragraph (1) applies to dividend income originating from —

- (a) any rental and property-related income (including capital gain derived from divestment of property) from the property named “VIE1”, located at Computerstrasse 4, 1100 Vienna, Austria, where such income is not subject to tax under the laws of Austria; and
- (b) any interest income derived from any temporary deposit with a financial institution in Austria of the income mentioned in sub-paragraph (a).

(3) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 20 June 2025 that is issued on behalf of the Minister for Finance and addressed to EY Corporate Advisors Pte. Ltd.

Made on 29 December 2025.

NGIAM SIEW YING
*Second Permanent Secretary,
Ministry of Finance,
Singapore.*

[AG/LEGIS/SL/134/2025/7]