

No. S 14**INCOME TAX ACT 1947****INCOME TAX
(SEASPAN CORPORATION PTE. LTD., ETC. —
SECTION 13(4) EXEMPTION)
NOTIFICATION 2026****ARRANGEMENT OF PARAGRAPHS****Paragraph**

1. Citation and commencement
 2. Exemption
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In exercise of the powers conferred by section 13(4) of the Income Tax Act 1947, the Minister for Finance makes the following Notification:

Citation and commencement

1. This Notification is the Income Tax (Seaspan Corporation Pte. Ltd., etc. — Section 13(4) Exemption) Notification 2026 and is deemed to have come into operation on 1 October 2025.

Exemption

2.—(1) The interest, commission, fee and other payments payable during the period from 1 October 2025 to 30 June 2037 (both dates inclusive) by the borrowers mentioned in the first column of the following table to any person who is not resident in Singapore in connection with the respective financing arrangements mentioned in the second column of the table for the respective amounts of financing mentioned in the third column of the table, are exempt from tax.

<i>First column</i>	<i>Second column</i>	<i>Third column</i>
<i>Borrower</i>	<i>Financing arrangement</i>	<i>Amount of financing (US\$)</i>
Seaspan Corporation Pte. Ltd.	Indenture agreement dated 14 July 2021	750,000,000
Seaspan Holdco III Ltd.	Credit agreement dated 3 March 2023	560,700,000
	Credit agreement dated 3 March 2023	1,390,000,000
	Note purchase agreement dated 21 May 2021	500,000,000
	Note purchase agreement dated 17 May 2022	500,000,000
	Swap agreement dated 5 February 2020	32,000,000
	Swap agreement dated 25 January 2021	100,000,000
	Swap agreement dated 11 February 2021	100,000,000
	Swap agreement dated 28 January 2022	500,000,000
	Swap agreement dated 7 September 2023	250,000,000

(2) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 18 November 2025 that is issued on behalf of the Minister for Finance and addressed to KPMG Services Pte. Ltd.

Made on 12 January 2026.

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

[AG/LEGIS/SL/134/2025/1]