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No. S 514

INCOME TAX ACT 1947

INCOME TAX (SATURN1 INFRASTRUCTURE HOLDINGS PTE. LTD. — SECTION 13(12) EXEMPTION) ORDER 2026

ARRANGEMENT OF PARAGRAPHS

Paragraph

1. Citation
2. Exemption

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 (Saturn1 Infrastructure Holdings Pte. Ltd. — Section 13(12) Exemption) Order 2026.

Exemption

2.—(1) Any partnership profit described in sub-paragraph (2) that is distributed by Blacksaif Pipelines Holdings Aggregator L.P. (a private fund limited partnership registered in Scotland) and received in Singapore by Saturn1 Infrastructure Holdings Pte. Ltd. (a company incorporated in Singapore) on or after 23 February 2022 is exempt from tax.

(2) Sub-paragraph (1) applies to partnership profit that is paid out of interest income or dividend income that —

(*a*) is received by Blacksaif Pipelines Holdings Aggregator L.P. from Greensaif Pipelines Topco S.à r.l. (a company incorporated in Luxembourg); and

(*b*) originates from income derived by Aramco Gas Pipelines Company (a limited liability company incorporated in

Saudi Arabia) from a gas pipelines network located in Saudi Arabia used for gas distribution and transmission.

(3) The exemption in sub-paragraph (1) is subject to the conditions specified in the letter from the Inland Revenue Authority of Singapore dated 4 June 2026 that is issued on behalf of the Minister for Finance and addressed to EY Corporate Advisors Pte. Ltd.

Made on 26 July 2026.

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

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