Epicsense Insights

November 2026

Audit exemption in Singapore

新加坡的审计豁免

Who qualifies, what still applies, and the 2026 review.

谁符合资格、哪些义务仍然适用，以及 2026 年的检讨。



EPICSENSE

Many private companies in Singapore do not need a statutory audit. The exemption is not automatic, though. It depends on the company's size over two years, the size of any group it belongs to, and whether a shareholder asks for an audit. This issue explains who qualifies, and what still applies when you do.

新加坡许多私人公司无须进行法定审计，但审计豁免并非自动适用，而是取决于公司连续两年的规模、所属集团的规模，以及是否有股东要求审计。本期说明哪些公司符合资格，以及获得豁免后仍须履行的义务。

01

Who qualifies: the small company test

谁符合资格：小型公司测试

Under section 205C and the Thirteenth Schedule of the Companies Act 1967, a private company is exempt from audit if it is a small company. It must be a private company throughout the financial year, and meet at least two of the three criteria below for the immediate past two consecutive financial years.

根据《1967年公司法》第205C条及第十三附表，私人公司如属小型公司，即可豁免审计。公司须在整个财政年度内均为私人公司，并在紧接的前两个连续财政年度中，每年至少符合以下三项标准中的两项。

Criterion 标准	**Limit** 限额	**How it is measured** 计算方式
Total annual revenue 年度总收入	S$10 million or less 不超过 S$1,000 万	Revenue in the financial statements, prepared under the accounting standards 按会计准则编制的财务报表中的收入
Total assets 总资产	S$10 million or less 不超过 S$1,000 万	Total assets in the statement of financial position 财务状况表中的总资产
Employees 员工人数	50 or fewer 不超过 50 人	Full-time employees at the end of the financial year 财政年度结束时的全职员工人数

Two of the three are enough. A company with revenue of S$15 million can still qualify if its total assets and headcount are within the limits.

三项中符合两项即可。例如收入达 S$1,500 万的公司，只要总资产和员工人数都在限额之内，仍可符合资格。

In plain terms

Small means meeting at least two of these in each of the last two years: revenue up to S$10 million, total assets up to S$10 million, and 50 full-time staff or fewer.

简而言之

“小型”是指在过去两个年度中，每年至少符合以下两项：收入不超过 S$1,000 万、总资产不超过 S$1,000 万、全职员工不超过 50 人。

New companies

A company that is less than two years old qualifies if it meets the criteria in the current financial year. If it does not qualify in its first year, it is tested again on the same basis in its second year.

Corporate shareholders are not a bar

A company can qualify even if some or all of its shareholders are companies. It does not need to be an exempt private company.

新成立的公司

成立未满两年的公司，只要在当前财政年度符合标准即可享有豁免。如果第一年不符合资格，第二年会按同样标准重新评估。

有公司股东也可符合资格

即使部分或全部股东为公司，公司仍可符合资格，无须是豁免私人公司（Exempt Private Company）。

02

Companies in a group
属于集团的公司

If the company has a parent or subsidiaries, passing the test on its own is not enough. The whole group must also be a small group, meeting at least two of the same three criteria for the immediate past two consecutive financial years. Revenue and total assets are based on the holding company's consolidated financial statements, and foreign members of the group are included.

This applies whether or not consolidated financial statements are actually prepared or filed. A Singapore subsidiary of a large local or overseas group will therefore usually need an audit, however small the subsidiary itself is.

如果公司有母公司或子公司，仅公司本身通过测试并不足够，整个集团也必须属于小型集团，即在紧接的前两个连续财政年度中，每年至少符合上述三项标准中的两项。收入和总资产以控股公司的合并财务报表为准，集团内的境外成员也须计算在内。

无论集团是否实际编制或提交合并财务报表，此规定都适用。因此，大型本地或海外集团旗下的新加坡子公司，即使本身规模很小，通常仍须进行审计。

In plain terms

A small company that belongs to a large group still needs an audit.

简而言之

属于大型集团的小公司，仍须进行审计。

Goodwill and other intangible assets count towards the group's total assets. Our earlier issue, “Audit exemption for groups and goodwill”, covers this in more detail.

商誉及其他无形资产须计入集团总资产。我们较早前的一期《集团的审计豁免与商誉》对此有更详细的说明。

03

Staying small, and when it ends
维持小型公司资格及其终止

Once a company qualifies as a small company, it stays small in later years. It stops being small only if it ceases to be a private company, or if it fails to meet two of the three criteria for two consecutive financial years. One year above the limits does not end the exemption.

公司一旦符合小型公司资格，以后年度会继续维持该资格。只有在公司不再是私人公司，或连续两个财政年度未能符合三项标准中的两项时，才会失去资格。只有一个年度超出限额，并不会终止豁免。

Illustration: when does a company stop being small? 示例：公司何时不再属于小型公司?

Year 年度	Revenue S$m 收入 (百万)	Total assets S$m 总资产 (百万)	Employees 员工	Criteria met 符合项数	Status 状态
Year 1 第1年	8.0	6.0	35	3 of 3 3 项	Small (new company) 小型公司（新公司）
Year 2 第2年	9.5	7.5	42	3 of 3 3 项	Small 小型公司
Year 3 第3年	13.0	11.0	48	1 of 3 1 项	Still small: only one year failed 仍属小型：只有一年不符合
Year 4 第4年	14.5	12.5	55	0 of 3 0 项	Ceases to be small: two years failed in a row 不再属于小型：连续两年不符合

Illustrative figures. Once it ceases to be small, the company needs an audit again until it meets the criteria for two consecutive financial years.

数字仅供说明。公司一旦失去小型公司资格，便须恢复审计，直到再次连续两个财政年度符合标准为止。

04

Dormant companies
休眠公司

A dormant company, one with no accounting transactions in the year apart from a few permitted items such as statutory fees, is exempt from audit under section 205B. This exemption is not limited to private companies.

休眠公司是指在年度内除少数获准项目（例如法定费用）外，没有任何会计交易的公司。根据第205B条，休眠公司可豁免审计，而且此项豁免并不限于私人公司。

A dormant private company with total assets of not more than S$500,000 may also be exempt from preparing financial statements under section 201A, subject to conditions.

总资产不超过 S$50 万的休眠私人公司，在符合相关条件的情况下，还可根据第201A条豁免编制财务报表。

05

What exemption does not remove
审计豁免并不免除的义务

Audit exemption removes the audit, not the rest of the annual reporting cycle. An exempt company must still:

- keep proper accounting records that explain its transactions and financial position (section 199);
- prepare financial statements that comply with the accounting standards, together with a directors' statement;
- hold its AGM, or dispense with it where allowed, and file its annual return with ACRA, including financial statements in XBRL unless exempt from that;
- file its corporate income tax return with IRAS, based on the unaudited financial statements; and
- check whether a bank, investor, regulator, licence or grant scheme requires audited accounts anyway.

In plain terms

Exemption saves the audit fee, but the directors are still responsible for the accounts being right.

审计豁免只是免除审计，并不免除年度报告的其他要求。获豁免的公司仍须：

- 妥善保存能说明其交易及财务状况的会计记录（第199条）；
- 编制符合会计准则的财务报表，并附上董事声明；
- 召开常年股东大会（或在允许的情况下豁免召开），并向 ACRA 提交年度申报表，除非获豁免，否则须以 XBRL 格式提交财务报表；
- 根据未经审计的财务报表，向 IRAS 提交企业所得税申报表；以及
- 确认银行、投资者、监管机构、执照或津贴计划是否仍要求提供经审计的账目。

简而言之

豁免可以省下审计费，但董事仍须对账目的准确性负责。

06

Shareholders can still ask for an audit
股东仍可要求审计

Shareholders holding at least 5% of the total voting rights can require the company to have its financial statements audited, by giving written notice to the company not later than one month before the end of the financial year.

A voluntary audit can also be worth having when the company is raising funds, applying for bank facilities, preparing to sell the business, or sitting close to the thresholds.

持有总投票权至少 5% 的股东，可在财政年度结束前至少一个月以书面通知公司，要求公司对其财务报表进行审计。

当公司正在融资、申请银行信贷、准备出售业务，或规模接近门槛时，自愿进行审计也可能是值得的。

07

The 2026 review
2026年的检讨

In February 2026, ACRA began a review of the audit exemption framework to reduce compliance costs for small companies. Areas under consideration include higher revenue and total assets thresholds, and whether a subsidiary could qualify even where its group does not. Consultation closed in April 2026. At the date of this issue no change has been announced, and any change would need an amendment to the Companies Act. Until then the current S$10 million thresholds apply, and a company should not drop its audit in anticipation of a change.

ACRA 于 2026 年 2 月开始检讨审计豁免框架，以降低小型公司的合规成本。检讨范围包括提高收入及总资产门槛，以及子公司在集团不符合条件时能否仍然获得豁免。咨询已于 2026 年 4 月结束。

截至本期出版日，当局尚未宣布任何改变，而任何改变都须修订《公司法》。在此之前，现行的 S$1,000 万门槛继续适用，公司不应因预期规定会改变而提前取消审计。

Sources. Companies Act 1967, sections 199, 201A, 205B and 205C and the Thirteenth Schedule. ACRA: Audit exemptions, small company concept (updated February 2026); Reducing compliance costs for small companies: review of the audit exemption framework (February 2026).

Epicsense Insights

Not sure if you need an audit?

不确定是否需要审计?

Whether or not you are an existing client, we would be glad to help you check whether your company or group qualifies for audit exemption, and to prepare or review your financial statements either way. Please contact any of our audit partners and directors.

无论您是否为我们的现有客户，我们都乐意协助您评估贵公司或集团是否符合审计豁免资格，并协助编制或复核财务报表。欢迎联系我们的任何一位审计合伙人或总监。



JY Chan
Managing Partner
jy@epics.sg
+65 6277 6492 ext. 104



Maggie Tai
Head of Audit
maggie@epics.sg
+65 6277 6492



Zerome Wong
Audit and Accounting Director
zw@epics.sg
+65 6277 6492 ext. 103



David Chu
Audit Partner
david@epics.sg
+65 6277 6492 ext. 114

Epicsense Global Assurance PAC · UEN 202654165M
118 Aljunied Ave 2, #06-108, Singapore 380118
Offices in Melaka, Kuala Lumpur, Kuantan and Johor
+65 6277 6492 · info@epics.sg · epics.sg

© 2026 Epicsense Global Assurance PAC. This publication contains general information only and is not professional advice. All figures are illustrative. The thresholds are those in force at the date of publication; please check the current position with ACRA and speak to a qualified adviser before acting on any point.

本刊物仅提供一般资讯，并不构成专业意见。所有数字仅供说明。门槛以出版日有效的规定为准，采取任何行动前，请向 ACRA 确认最新规定并咨询合格顾问。