Current Revision □ Taxation on trust income ○ Taxpayer ① (Principle) Beneficiary ② (Exception) Consignor - When the beneficiary is not specified or does not exist ○ (Taxation method) Taxation on taxpayers by income source □ Taxation on trust income ① (Same as left) ② Expansion of consignor’s taxation scope - When the consignor is the actual beneficiary\* \* In cases where the beneficiary is not specified or does not exist, or where the trustor controls and governs the trust, as prescribed by enforcement ordinance ○ (Same as left) <New> □ Allow selection of trust property corporate tax taxation method ○ (Target) Selected by the trustee\* among the trusts in ① to ④ (excluding investment trusts under the Capital Markets Act) (excluding cases where the trustee controls/governs the trust) \* Limited to domestic corporations and residents ① Purpose trust according to §3 of the Trust Act ② Beneficiary certificate issuance trust pursuant to §78 of the Trust Act ③ Limited liability trust pursuant to §114 of the Trust Act ○ (Taxation method) Income from trust property is taxed on the trustee \* Dividend income tax is imposed upon distribution by the trustee to the beneficiary.