GST下的NFT与实用型代币

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

NFT不具有可替代性，因此不可能构成DPT。其GST处理取决于其实际性质。作为数字收藏品的NFT，属于卖方提供的服务（授予数字内容上的权利）：如卖方已办理GST注册且买方属于新加坡，则按标准税率征税；如买方属于海外，则适用零税率。代表实物商品权利的NFT，视为该商品的供应。代表证券或基金份额的NFT属于金融服务，予以豁免。大量铸造和销售NFT的新加坡艺术家或工作室，一旦营业额超过100万新元，就必须办理GST注册，并须逐一确定每位买方的归属地。在匿名交易市场上，这一点很难做到。《DPT指南》中的替代判断方法并未正式延伸适用于NFT销售。IRAS会期望通过交易市场的条款收集居住地信息。[1]

实用型代币属于预付款。出售使持有人有权从发行人处获得某项服务的代币，按《GST法》中的规则视为出售代金券。如该代金券为多用途代金券，则在兑换时核算GST；如为单一用途代金券，则在出售时核算。[2] 因此，如果代币具有单一且可识别的用途，在代币销售中向新加坡用户出售实用型代币的新加坡平台，可能须在销售日就全部募集金额承担GST纳税义务。实用型代币在所得税上的递延处理（本部分第I章）并不适用于GST，两种税的纳税时点可能不同。计划从新加坡开展实用型代币销售的创始人，应在定价之前，按9%的税率测算募集金额中属于新加坡部分的GST。

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

注释

1. IRAS关于NFT的GST处理以及数字服务供应一般规则的网站指引。 ↩
2. Goods and Services Tax Act 1993，第35条及代金券规则；IRAS，e-Tax Guide *GST: Treatment of Vouchers*，现行版本。 ↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com