消费税法上数字支付代币的定义

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GST法上的定义比《支付服务法》的定义更窄，也比所得税指南中支付型代币的概念更窄。数字代币是经加密保护、可以电子方式转移、存储或交易的价值的数字化表示。只有同时满足另外四项条件，它才属于消费税法意义上的数字支付代币。它必须以单位表示。它必须被设计为可替代的。它不得以任何货币计价，其发行人也不得将其与任何货币挂钩。它必须是或旨在成为被公众或部分公众接受的交换媒介，且其作为对价使用时不受实质性限制。[1]

三项排除规定使这一定义得以完整。货币被排除在外。因DPT以外的原因而根据第四附表第I部分享受豁免的代币被排除在外，这使证券型代币和衍生品脱离DPT类别，归入现有的金融服务豁免。赋予持有人向特定人士获取商品或服务的权利、且该权利一经使用即不再作为交换媒介的代币被排除在外，这排除了实用型代币和类似代金券的代币。[2]比特币、以太币、莱特币以及类似的公链资产符合条件。只能在单一平台上使用的该平台代币则不符合。

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代币	消费税类别	兑换法定货币时的处理
比特币、以太币、Solana	数字支付代币	豁免（客户属于境外的适用零税率）
USDC、USDT、XSGD（与货币挂钩）	非DPT；视为衍生品	依据第四附表第I部分第1(j)段豁免
代币化股份或债券	非DPT；证券	作为金融服务豁免
用于平台自身服务的实用型代币	非DPT；类似代金券	作为服务预付款适用标准税率
NFT（独一无二、不可替代）	非DPT	由注册人向新加坡客户提供时适用标准税率
在交易所交易的治理代币	如作为交换媒介使用则属于DPT	豁免；分类取决于事实
封装比特币（Wrapped Bitcoin）	如可替代且作为交换媒介使用则属于DPT	豁免；分类取决于事实

分类属于事实问题，而且会发生变化。为对某一协议进行投票而发行的治理代币，起初可能不在定义范围之内，而一旦被交易所上线并被商户接受，就可能落入定义范围。IRAS已表示，它将考察代币在供应时的设计和实际用途，这意味着已注册消费税的发行人必须定期重新审视其自身代币的分类。

注释

1. IRAS，电子税务指南*GST: Digital Payment Tokens*，第三版，2026年1月30日，第5节（数字支付代币的定义：单位、可替代性、不以货币计价或挂钩、被公众接受的交换媒介）。 ↩
2. IRAS，电子税务指南*GST: Digital Payment Tokens*，第三版，2026年1月30日，第5节（排除：货币、因其他原因根据第四附表第I部分享受豁免的代币、代金券类代币）。 ↩

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