以代币作为报酬

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大多数数字资产企业都以代币支付部分员工报酬。创始人在创世时获得分配，工程师获得分四年归属的代币授予，顾问则因在网站上署名而获得一定比例的供应量。新加坡将这一切作为受雇收入或专业收入征税，因为第10(1)(b)条对“任何受雇所得的收益或利润”征税，而该法将此类收益定义为包括以金钱或金钱等价物形式提供的任何津贴或福利。[1] 代币属于金钱等价物。因此，雇员收到代币时，须按其取得权利之日的新元价值纳税。关于数字代币的e-Tax指南确认，作为报酬收到的代币按收到时的价值作为受雇收入征税。[2]

纳税时点是决定税负的关键问题。分期归属的代币授予，在归属日之前不赋予雇员任何权利，因此应税事件是归属，应税金额为归属时的价值。立即交付但受禁止出售的锁定期约束的代币授予，在授予时即须纳税，因为即便雇员尚不能出售，代币已归其所有。在锁定期较长且可在链上强制执行的情况下，IRAS在实践中已接受因限制而给予折让。[3] 如果代币授予只是在未来某日交付代币的承诺，而代币尚不存在，则在交付代币时纳税。对于尚未上线的团队而言，这可能是承诺作出数年之后，价值也可能已高出许多倍。

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在两个中心之间迁移的创始人，首先必须了解与瑞士的差异。瑞士根据第37号通函在授予时对雇员股份征税，并就锁定期给予折让，期权则在行权时征税。代币授予根据其分类征税，FTA的工作文件将作为薪金收到的支付型代币视为收到时的收入（参见第G部分第IV章）。新加坡没有关于代币计划的通函，适用一般的受雇收入规则。如下一节所示，对立即授予而言结果相同，对期权而言结果则不同。

注释

1. Income Tax Act 1947 (2020 Rev. Ed.)，第10(1)(b)条及第10(2)(a)条（受雇所得的收益或利润包括因受雇而支付或给予的工资、薪金、假期工资、酬金、佣金、奖金、赏金、额外津贴或津贴）。 ↩
2. IRAS，e-Tax Guide *Income Tax Treatment of Digital Tokens*，第二版，2026年1月30日，关于作为服务或受雇报酬收到的数字代币的章节。 ↩
3. IRAS关于受限股份及禁售期折让的行政实践，类推适用于锁定代币。 ↩

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