由保密到自動交換

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新加坡與瑞士正是經合組織透明度項目旨在終結其銀行保密制度的兩個金融中心。兩地都曾抗拒，亦都在2009年至2014年間讓步，現時均根據共同匯報標準（CRS）與一百多個司法管轄區自動交換帳戶資料。[1] 數碼資產在十年間一直處於該制度之外，因為CRS是為存放於存款機構及託管機構的金融帳戶而設，而自行保管的錢包兩者皆不是。經合組織於2022年採納、兩個樞紐均已承諾實施的加密資產申報框架（CARF），將於2027年及2028年起填補這個缺口。[2] 本章說明兩套制度各自對數碼資產業務的要求，以及兩者各自會向稅務當局透露哪些有關在兩個樞紐均持有資產的客戶的資料。

對讀者的實際影響可以簡單說明。直至2026年，在瑞士交易所持有代幣的新加坡稅務居民，或在新加坡交易所持有代幣的瑞士居民，除非自行申報持有的資產，否則其本國稅務當局無從得知。自首次CARF交換起，本國稅務當局每年都會收到外國交易所就客戶結餘及交易提交的報告。本部分第I章及第II章有關交易者與投資者界線的一切討論，以及第G部分第VIII章有關未申報錢包的一切討論，自那一刻起便有了執法的力度。

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註釋

1. OECD，*Standard for Automatic Exchange of Financial Account Information in Tax Matters*，2014年（2017年第二版）；Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information，瑞士於2014年11月19日簽署，新加坡於2017年6月21日簽署。 ↩
2. OECD，*Crypto-Asset Reporting Framework and Amendments to the Common Reporting Standard*，經合組織財政事務委員會於2022年8月26日通過，2022年10月10日發表。 ↩

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