監管指引表

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在兩個金融中心，監管指引均無法律效力，卻同樣支配日常實務。在瑞士，瑞士金融市場監管局（FINMA）的指引及通函表明該局如何解讀其執行的法例。偏離這些指引的機構，須準備在執法程序中就此據理力爭。在新加坡，新加坡金融管理局（MAS）根據《2019年支付服務法》或《2022年金融服務及市場法》發出的公告，對受文人具約束力。MAS的指引、常見問題及諮詢回應則列明其在發牌及視察時適用的期望。下列各表按編號、日期及主題列出書中引用的文件，並註明討論每份文件的部分。

FINMA日期為2018年2月16日、2019年8月26日、2019年9月11日及2023年12月20日的文件，已根據FINMA同日發出的新聞稿核實。[1]瑞士聯邦稅務局（ESTV）的工作文件，按ESTV加密貨幣網頁所示的日期列出；該網頁列明2022年8月3日的版本為現行版本，取代2019年8月27日的文件。[2]MAS 2023年8月15日有關穩定幣的回應，已根據MAS的媒體新聞稿核實。[3]其餘出處為下列MAS、新加坡國內稅務局（IRAS）及瑞士聯邦經濟事務秘書處（SECO）的刊物。[4]

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指引的變動比法例頻密，有時一年內更改數次。每個表均列出本書所依據版本的日期，因此讀者在依據某一門檻、時間表或獲准活動清單行事前，應先查核其後有否修訂。

註釋

1. FINMA新聞稿，2018年2月16日（ICO Guidelines）、2019年8月26日（FINMA Guidance 02/2019 "Payments on the blockchain"）、2019年9月11日（Supplement to the ICO Guidelines on stable coins）及2023年12月20日（FINMA Guidance 08/2023 on staking services），www.finma.ch。 ↩
2. Eidgenössische Steuerverwaltung, "Arbeitspapier: Kryptowährungen und Initial Coin/Token Offerings (ICO/ITO) als Gegenstand der Vermögens-, Einkommens- und Gewinnsteuer, der Verrechnungssteuer und der Stempelabgaben"，2022年8月3日版本，取代2019年8月27日版本，www.estv.admin.ch，網頁"Kryptowährungen"。 ↩
3. MAS媒體新聞稿"MAS Finalises Stablecoin Regulatory Framework"（2023年8月15日），www.mas.gov.sg。 ↩
4. MAS Notice PSN02 "Prevention of Money Laundering and Countering the Financing of Terrorism – Digital Payment Token Service"（2019年12月5日，經修訂）；MAS Guidelines PS-G02 "Guidelines on Provision of Digital Payment Token Services to the Public"（2022年1月17日，經修訂）；IRAS e-Tax Guide "Income Tax Treatment of Digital Tokens"（2020年4月17日）；IRAS e-Tax Guide "GST: Digital Payment Tokens"（2019年11月19日）。 ↩

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