# 共同匯報標準在新加坡

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新加坡透過《2016年所得稅（國際稅務合規協議）（共同匯報標準）規例》（Income Tax (International Tax Compliance Agreements) (Common Reporting Standard) Regulations 2016）實施共同匯報標準（CRS），盡職審查自2017年1月1日起進行，首次交換於2018年9月進行。須申報的新加坡金融機構識別屬須申報司法管轄區稅務居民的帳戶持有人，收集自我證明，每年5月31日前向新加坡國內稅務局（IRAS）申報，IRAS再於9月前與夥伴司法管轄區交換資料。[1] 根據《多邊主管當局協定》，瑞士是新加坡的CRS夥伴。兩國自2018年起已互相交換對方居民的帳戶資料。

新加坡的數碼資產業務如屬託管機構、存款機構、投資實體或特定保險公司，即屬CRS下的須申報金融機構。自2017年起，為客戶持有代幣的數碼支付代幣（DPT）託管人一直主張，由於代幣並非CRS所界定的「金融資產」，因此它並非託管機構。經合組織承認大部分加密資產不在該定義範圍內。這個缺口正是CARF出現的原因。新加坡與CARF同日起適用經修訂的CRS，把金融資產的定義擴展至特定電子貨幣產品及央行數碼貨幣，並把透過衍生工具及投資實體間接持有的加密敞口納入CRS申報範圍。[2] 投資於代幣的新加坡基金，就CRS而言早已屬投資實體。其投資者的權益自2017年起已須申報，而有外籍成員的家族辦公室有時會忽略這一點。

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# 註釋

1. Income Tax (International Tax Compliance Agreements) (Common Reporting Standard) Regulations 2016；Income Tax Act 1947，第105K條及續後條文（國際稅務合規協議）。IRAS，*CRS Overview*，5月31日的申報限期。 ↩
2. OECD，*Amendments to the Common Reporting Standard*，2022年（把特定電子貨幣產品及CBDC納入金融資產；申報透過投資實體間接投資於加密資產的情況）。 ↩

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