以代幣作為薪酬

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

大部分數碼資產業務以代幣支付部分人員的薪酬。創辦人在創世時獲得分配，工程師獲得分四年歸屬的代幣授予，顧問則因在網站上掛名而獲得一定百分比的供應量。新加坡把這一切作為受僱收入或專業收入課稅，因為第10(1)(b)條對「任何受僱所得的收益或利潤」徵稅，而該法把這些收益界定為包括任何以金錢或金錢等值形式提供的津貼或利益。[1] 代幣屬金錢等值。因此，僱員收取代幣，須按其有權取得代幣當日的新加坡元價值課稅。有關數碼代幣的e-Tax Guide確認，作為薪酬收取的代幣按收取時的價值作為受僱收入課稅。[2]

決定稅單的是時間點問題。隨時間歸屬的代幣授予，在歸屬日前不給予僱員任何權利，因此課稅事件是歸屬，應課稅金額是歸屬時的價值。即時交付但受禁售限制、不得出售的代幣授予，在授予時課稅，因為即使僱員暫時不能出售，他已擁有該代幣。實務上，如禁售期長且可在鏈上強制執行，新加坡國內稅務局（IRAS）曾接受因限制而作出折讓。[3] 如代幣授予只是在將來某日交付代幣的承諾，而代幣尚未存在，則在交付代幣時課稅。對於尚未上線的團隊而言，這可能是作出承諾多年之後，價值亦可能高出許多倍。

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

在兩個樞紐之間遷移的創辦人，首先必須了解與瑞士的差異。瑞士根據第37號通函，在授予時對僱員股份課稅，並因禁售期給予折讓；期權則在行使時課稅。代幣授予按其分類課稅，瑞士聯邦稅務局（ESTV）的工作文件把作為薪金收取的支付代幣，視為收取時的收入（參見第G部分第IV章）。新加坡並無有關代幣計劃的通函，而是適用一般受僱收入規則；如下一節所示，這對即時授予得出相同結果，對期權則得出不同結果。

註釋

1. Income Tax Act 1947 (2020 Rev. Ed.)，第10(1)(b)條及第10(2)(a)條（受僱所得的收益或利潤包括就受僱支付或給予的工資、薪金、假期薪酬、袍金、佣金、花紅、酬金、額外福利或津貼）。 ↩
2. IRAS，e-Tax Guide *Income Tax Treatment of Digital Tokens*，第二版，2026年1月30日，有關作為服務或受僱報酬而收取的數碼代幣的一節。 ↩
3. IRAS，就受限制股份及禁售折讓的行政慣例，以類推方式適用於鎖定代幣。 ↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.