基金優惠對數碼資產的重要性

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新加坡的基金業建基於三項法定豁免。《1947年所得稅法》第13D、13O及13U條豁免獲批基金從「指定投資」取得的「指明收入」，條件是基金由新加坡基金經理管理，並符合新加坡金融管理局（MAS）訂定的條件。如沒有豁免，屬新加坡稅務居民的基金須就其交易利潤繳納17%的稅款。經常買賣資產的基金，按第I章的經營貿易的標誌分析屬交易者。有了豁免，不論交易模式如何，基金均無須就指明收入繳稅。對數碼資產基金而言，這些豁免比只做多的股票基金更為重要，因為大部分加密策略的交易頻密，令資本增值的論據薄弱，豁免便成為唯一可靠的保障。[1]

2024年財政預算案把三項計劃延長至2029年12月31日，MAS亦於2024年10月1日以FDD Cir 10/2024號通函修訂其條件，自2025年1月1日起生效。2025年財政預算案及其後的通函作出進一步調整。以下載列截至2026年6月30日的條件。[2]

註釋

1. Income Tax Act 1947 (2020 Rev. Ed.)，第13D條（前第13CA條）、第13O條（前第13R條）及第13U條（前第13X條）；Income Tax (Exemption of

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Income of Prescribed Persons Arising from Funds Managed by Fund Manager in Singapore) Regulations 2010，以及適用於第13O條及第13U條的相應規例。上述條文在該法2020年修訂版中重新編號，於2021年12月31日生效。 ↩

2. MAS Circular FDD Cir 10/2024，2024年10月1日（第13D、13O及13U條的經修訂條件，自2025年1月1日起生效），摘要見Deloitte Singapore，*Tax Bytes*，2024年10月3日。 ↩

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