PwC Annual Global Crypto Tax Report 2026

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Opening statement

What's in store?

Peter Brewin

Partner

Our annual publication of the Global Crypto Tax Report arrives at a pivotal moment in the development of the crypto ecosystem. The industry is increasingly regulated, which has driven huge changes in the business models of those operating in the sector and is resulting in convergence between the crypto sector and traditional financial services. Tax transparency in crypto has also been a key theme, with the introduction of the OECD's Crypto Asset Tax Reporting Framework, which is now live in many jurisdictions.

This year's report, with information updated as of 1 October 2025, explores developments across jurisdictions, offering insights into all aspects of crypto-assets. The editorial team would like to thank the EMEA Tax, Legal and Workforce Knowledge Management team and each of our contributing network firms for their support in sharing the latest updates in their territories.

The market and regulations on tax and crypto are fast moving and constantly in motion. As you navigate your compliance obligations and tax affairs, please reach out to the specialists in the relevant jurisdictions for the latest information. We hope this report serves as a useful reference.

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Worldwide crypto tax summaries (reviewed as of 1 October 2025)

List of jurisdictions

Angola	Denmark	Kenya	Nigeria	Spain
Armenia	Estonia	Korea	Norway	Sweden
Australia	Finland	Kosovo	Oman	Switzerland
Austria	Germany	Latvia	Panama	Taiwan
Belgium	Gibraltar	Liechtenstein	Philippines	Thailand
Bulgaria	Hong Kong	Lithuania	Portugal	Turkey
Cabo Verde	Hungary	Luxembourg	Qatar	Ukraine
Canada	Iceland	Malaysia	Saudi Arabia	United Arab Emirates
Chile	India	Malta	Singapore	United Kingdom
Croatia	Ireland	Mauritius	Slovakia	United States
Cyprus	Italy	Netherlands	Slovenia	
Czech Republic	Japan	New Zealand	South Africa	

Angola (1 of 2)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No. In March 2024, Angola's Presidente of the Republic enacted a law to regulate crypto-asset mining activities, aiming to prohibit miners other than the Angolan National Bank ("BNA") to operate in Angola. However, no guidance has been issued on the taxation of crypto assets.
2. If "yes", what is the scope of taxability?	Not applicable.
3. What are the direct tax implications?	Currently, there are no guidelines or legislation that imposes any direct tax on crypto assets and no direct tax legislation is foreseen in the near future. The Investment Income Tax ("IAC"), at a rate of 15%, due by the holders of the respective income, whether natural persons or legal entities, would be the most likely tax to be due on income from the sale of crypto assets. The income could be subject to corporate income tax, at a rate of 25% if the sale of crypto assets is considered to be a company's regular business activity.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Angola (2 of 2)

Indirect Tax (1 of 1)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No. In Angola, fees and commissions related to the provision of financial services are liable to VAT.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not defined. NFTs likely to be taxed as services.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No specific provision, in principle liable to VAT in accordance with the place of supply rules.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	The service provider / seller generally is liable for the payment of VAT on the provision of services. The VAT code provides joint liability only for intermediaries (as digital marketplaces).
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Armenia (1 of 3)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	On June 24, 2025, the Republic of Armenia enacted significant amendments to its Tax Code (hereinafter "TC RA"), specifically targeting the regulatory framework for crypto-assets within the tax system. The revised TC RA adopts the definition of crypto-assets as outlined in the newly introduced law "On Crypto-assets“ (hereinafter “Law”) published by the Central Bank of Armenia. This definition encompasses not only fungible cryptocurrencies, but also non-fungible tokens (NFTs) and crypto-assets generated as incentives in decentralized systems. Notably, financial instruments such as securities, investment fund shares, and bank deposits are expressly excluded from this classification.
2. If “yes”, what is the scope of taxability?	The disposal of crypto-assets has been included in the list of transactions subject to corporate income tax (hereinafter "CIT") and personal income tax (hereinafter "PIT"). Provision of services using crypto-assets is considered a taxable transaction with CIT.
3. What are the direct tax implications?	**CIT**: An income derived from the disposal of crypto assets and/or provision of services using crypto-assets is considered taxable with 18% of CIT. According to the TC RA, the gross taxable income is calculated as a positive difference between taxable income and deductible expenses. Furthermore, in determining the CIT base, the gross income shall not be reduced by any portion of the original value of the crypto asset that exceeds the income derived from the transaction of disposing of said crypto asset. **PIT**: The income derived from the disposal of crypto assets is considered deductible income for the purposes of determining the PIT base. Hence, it is not subject to PIT.

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Armenia (2 of 3)

Direct Tax

Question	Response
	This excludes income from the disposal of crypto assets that are deemed unique in nature and non-fungible, as well as income from the disposal of crypto-assets generated as incentives in decentralized systems.
4. Are there any other relevant/noteworthy tax considerations?	A favorable 1% income tax rate is applicable to income derived from the disposal of unique, non-fungible crypto-assets (including NFTs) and crypto-assets generated as incentives in decentralized systems.
5. What are the tax compliance/ reporting requirements?	Income generated from the disposal of crypto assets should be reported in the annual CIT filing, which is due by April 20th of the year following the tax year. In Armenia, the tax year corresponds to the calendar year. Income generated from the disposal of crypto assets including unique, non-fungible crypto-assets (including NFTs) and crypto-assets generated as incentives in decentralized systems should be reported in the annual personal income tax declarations which are due by November 1st of 2026 for the calendar year 2025.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No. In response to the recent enactment of new tax regulations and Law, the Armenian tax authorities are working on development strategies to facilitate a smooth implementation process for taxpayers.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Armenia (3 of 3)

Indirect Tax

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	On June 24, 2025, substantial amendments were implemented to TC RA, which included new provisions governing the application of VAT to transactions involving crypto assets.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	In accordance with the recent amendments to the TC RA, both the disposal of crypto assets and the provision of services involving crypto assets, as outlined by the Law, are subject to VAT taxation.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not applicable.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not applicable.
5. Are there any other applicable exemptions relating to cryptoassets?	In Armenia, the disposal of crypto assets is considered exempt from VAT.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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Australia (1 of 7)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – the Australian Tax Office (ATO) has published general guidance on their website in relation to the tax treatment of cryptocurrency investments. The ATO treats cryptocurrency as property, rather than currency, and considers disposal of cryptocurrency as a taxable capital gains tax (CGT) event. While there has been increased scrutiny from the ATO in recent times in relation to the profits made from cryptocurrency investing and trading, there is no specific income tax legislation in force directly in the taxation of cryptocurrency. The ATO has issued a limited number of taxation determinations and public tax rulings which consider either the income tax or GST treatment of cryptocurrency, however these are not binding for taxpayers. Taxpayers may approach the ATO and seek a private tax ruling to confirm the tax outcomes of a specific scenario and the ATO's response will be legally binding for the applicant in this circumstance. **Proposed legislation** While there is no specific income tax legislation in respect of cryptocurrencies year to date, there has been an increasing number of government consultations and new regulatory proposals in respect of cryptocurrencies. These include: 1. In March 2025 the Government responded to the Board of Taxation's 'Review of the taxation treatment of digital assets and transactions in Australia' and agreed that no crypto specific tax legislation should be introduced at the current time. 2. In September 2025 consultation commenced on proposed law for digital asset platforms. Amongst other proposals, the draft law seeks to modernize Australia's digital assets regulatory regime. These changes are regulatory focused rather than tax law related.

Australia (2 of 7)

Direct Tax (2 of 3)

Question	Response
2. If "yes", what is the scope of taxability?	Under the current Australian income tax rules, cryptocurrency is not viewed as money or foreign exchange but rather a CGT asset or as a revenue asset, like shares or property, with the character of the asset depending on the intention of the holder. While a digital wallet can contain different types of cryptocurrencies, each cryptocurrency is a separate asset.
3. What are the direct tax implications?	Where cryptocurrency is held on capital account, a CGT event is triggered when cryptocurrency is sold or exchanged for AUD or other cryptocurrencies or used to obtain goods and services (unless it is considered a personal use asset). In certain circumstances, a 50% discount of the taxable gain can apply where the cryptocurrency has been held by an individual or trust for a period more than 12 months. Given the nature of cryptocurrency, the frequency with which it is transacted and the common intention for acquiring cryptocurrency being to resell for a profit, it is likely that the ATO will consider investing and trading in cryptocurrencies to be on revenue account (i.e. for short term gains, rather than long-term growth). Accordingly, any profits from cryptocurrency would be taxed as assessable income at the taxpayer's marginal tax rate and not eligible for the 50% CGT discount. Cryptocurrency held by a cryptocurrency investor as a hobby may not be subject to capital gains tax on the disposal of a cryptocurrency. This will depend on whether it can be demonstrated that the cryptocurrency is a 'personal use asset' valued at AUD10,000 or less. We note that given the nature of the cryptocurrency, it is often difficult to demonstrate intention for long-term investment purposes and it is likely to be assumed that the cryptocurrency is held on a revenue account, unless there is clear evidence to substantiate otherwise. In this case, gains or losses realized from cryptocurrency transactions are subject to income tax at the investor's marginal tax rate (and is not subject to discount), or for traders, under the trading stock rules. If an investor is carrying on a business of trading cryptocurrency, then the cryptocurrency will be considered to be held on a revenue account. Profits or losses realized from the disposal of cryptocurrency should be included in their taxable income and subject to income tax at the investor's marginal tax rate (and is not subject to discount).

Australia (3 of 7)

Direct Tax (3 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	For larger organizations including financial institutions, the taxation of cryptocurrency may fall under the Taxation of Financial Arrangements regime. The precise tax treatment will depend on the nature of the underlying cryptocurrency but generally would be on revenue account, where these rules apply. There are still several interpretative issues that need to be resolved in relation to when and how this regime might apply to cryptocurrencies.
5. What are the tax compliance/ reporting requirements?	When taxpayers complete their income tax return, they must report gains and losses from cryptocurrency transactions on capital or revenue accounts (subject to the intention of the relevant taxpayer).

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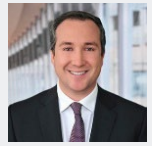

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Australia (4 of 7)

Indirect Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – A New Tax System (Goods and Services Tax) Act 1999 (the GST Act) covers the positions and sets out the rules. The Australian Taxation Office (ATO) has released public guidance in relation to the GST implications for: • Digital currency in general; • Digital currency trading; • Digital currency exchange (DCE) interactions; and • Digital currency as a form of payment While the guidance released by the ATO is reflective of the straight application of existing GST principles, we expect further guidance to be published that will address more nuanced arrangements and transactions in the foreseeable future.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The sale of digital currency is an input taxed sale for GST purposes, meaning that: 1. No GST is paid on the sale of digital currency; and 2. GST credits cannot be claimed for the GST included in the price paid for any purchases to make those sales. Digital currency is defined in the GST Act as digital units of value that: a. are designed to be fungible; and b. can be provided as consideration for a supply; and c. are generally available to members of the public without any substantial restrictions on their use as consideration; and d. are not denominated in any country's currency; and e. do not have a value that depends on, or is derived from, the value of anything else; and f. do not give an entitlement to receive, or to direct the supply of, a particular thing or things, unless the entitlement is incidental to: i. holding the digital units of value; or ii. using the digital units of value as consideration;

Australia (5 of 7)

Indirect Tax (2 of 4)

Question	Response
2. If "yes", what is the position for GST / VAT / ESS or equivalent? (cont'd)	but does not include: g. money; or h. a thing that, if supplied, would be a financial supply for a reason other than being a supply of one or more digital units of value to which paragraphs (a) to (f) apply.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs are not yet specifically defined under Australian GST law. However, under the GST rules, an NFT generally does not fall within the definition of digital currency. Therefore, the GST treatment of an NFT depends on whether the transaction meets the requirements of being a taxable, input taxed or GST-free supply under the GST rules. Ordinarily, the sale of NFTs to Australian buyers should attract GST while the sale of NFTs to overseas buyers is GST-free in most cases.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Assuming the cryptocurrency qualifies as digital currency for GST purposes, the sale of the NFT will be subject to the normal rules and the cryptocurrency will be treated as consideration for the NFT. However, the provision of the cryptocurrency will not be treated as a supply for GST purposes and no barter transaction arises. This treatment is effectively the same as the sale of NFTs for fiat currency. In working out the value of the digital currency received as consideration, you may use the Australian Dollar exchange rate from a digital currency exchange or website on the relevant conversion day that applies in your circumstance (i.e., receipt of any part of the payment, transaction date, invoice date, etc.).
5. Are there any other applicable exemptions relating to cryptoassets?	Yes, a crypto asset may be input taxed (exempt) where it falls within the definition of other financial services (for example, a financial derivative).

Australia (6 of 7)

Indirect Tax (3 of 4)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	A New Tax System (Goods and Services Tax) Act 1999 section 84-70. 1. A service (including a website, internet portal, gateway, store or marketplace) is an electronic distribution platform if: a. The service allows entities to make supplies available to end-users; and b. The service is delivered by means of electronic communication; and c. Any of the supplies that are inbound intangible consumer supplies are to be made by means of electronic communication. 2. However, a service is not an electronic distribution platform solely because it is: a. A carriage service (within the meaning of the Telecommunications Act 1997); or b. A service consisting of one or more of the following: i. Providing access to a payment system; ii. Processing payments; iii. Providing vouchers the supply of which are not taxable supplies because of s 100-5. A New Tax System (Goods and Services Tax) Act 1999 section 84-65. 1. A supply of anything other than goods or real property is an inbound intangible consumer supply if the recipient is an Australian consumer, unless: a. The thing is done wholly in the indirect tax zone; or b. The supplier makes the supply wholly through an enterprise that the supplier carries on in the indirect tax zone.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Marketplace
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Where a supply of an NFT is made from outside Australia to an Australian consumer through the marketplace (where it meets the definition under section 84-70 of the GST Act), the operator of the marketplace has the obligation to account for GST on the supply of the NFT.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	While there are currently no specific De-Fi rules under the existing GST law, the Board of Taxation (an Australian Government Agency) is currently reviewing the tax treatment of digital assets and transactions in Australia.

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Indirect Tax (4 of 4)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance? (cont'd)	As part of this review, the Board of Taxation noted international policy considerations in respect of De-Fi arrangements, including financial smart contracts, decentralized applications and other protocols used to automate De-Fi arrangements. To this end, we expect to see recommendations to establish policy frameworks for the GST treatment of De-Fi arrangements in the foreseeable future.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No

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Austria (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – On 14 February 2022 a new act ("Ökosoziales Steuerreformgesetz 2022") was published that provides for specific tax rules for cryptocurrencies for individuals. The new rules that are part of the Austrian Income Tax Act came into force on 1 March 2022. In addition, the Austrian Income Tax Guidelines (issued by the Austrian Ministry of Finance) meanwhile contain clarifications on the legal provisions.
2. If "yes", what is the scope of taxability?	A cryptocurrency within the meaning of the Austrian Income Tax Act is defined as a digital representation of value that is not issued or guaranteed by any central bank or public body and is not necessarily linked to a legally established currency and does not have the legal status of currency or money, but is accepted by individuals or entities as a medium of exchange and can be transmitted, stored and traded electronically. A stablecoin is a cryptocurrency within the meaning of this definition. Also, a utility token can qualify as a cryptocurrency, if such a token is accepted as a medium of exchange. Non-fungible tokens (NFT), security tokens and asset-backed tokens do not qualify as cryptocurrencies within the meaning of the Austrian Income Tax Act.
3. What are the direct tax implications?	Since 1 March 2022, income from cryptocurrencies attributable to individuals has been considered income from capital assets and is therefore taxed in the same way as income from conventional capital assets (such as shares, bonds, investment funds, etc.). Therefore, the following applies for individuals: • Capital gains are irrespective of the holding period subject to 27.5% tax. • Income from mining also qualifies as income from capital assets and is therefore subject to 27.5% tax. If, however, the mining activity goes beyond mere asset management, the mining income qualifies as income from trade or business, which is subject to progressive income tax (up to 55%). • Coins and tokens obtained through staking or received in the course of a hard fork, an airdrop or as a bounty are not taxable at the time of receipt. Such coins and tokens are to be recognized at acquisition costs of zero. Therefore, the total sales proceeds are subject to 27.5% tax. • The swap of cryptocurrencies is not a taxable event. Only the exchange in fiat or against goods and services is a taxable event.

Austria (2 of 5)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications? (cont'd)	• Capital losses can be offset against other income from cryptocurrencies and from conventional capital assets (i.e. dividend and interest income, income from investment funds, capital gains, etc.). Conversely, capital losses from conventional capital assets can be offset against income from cryptocurrencies. Losses that are not offset in a calendar year cannot be carried forward. The new rules apply to cryptocurrencies bought after 28 February 2021. For cryptocurrencies bought by individuals before 1 March 2021 (grandfathered cryptocurrencies) the following applies: • Capital gains, realized within one year after acquisition of the cryptocurrency (speculative income), are subject to progressive income tax. If the cryptocurrencies are sold after the one year's holding period capital gains are not taxable. • Capital losses realized within one year can only be credited against speculative income. • The swap of cryptocurrencies is a taxable event, if the swaps is carried out within one year after the acquisition of the coins swapped. For corporate investors any income from cryptocurrencies is subject to 25% corporate income tax.
4. Are there any other relevant/noteworthy tax considerations?	Austria is one of the first countries that introduced a withholding tax deduction on income from cryptocurrencies. Since 1 January 2024 Austrian services providers, who are involved in the settlement of cryptocurrency-transactions (such as crypto exchanges), has been obliged to withhold the 27.5% tax on income from cryptocurrencies and pay the tax for the investor to the tax office.
5. What are the tax compliance/ reporting requirements?	Income from cryptocurrencies that is not subject to withholding tax must be included in the income tax return, which generally has to be filed by 30 June for the previous calendar year. There are no specific reporting and compliance rules for cryptocurrencies.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The Austrian tax authorities have not yet published any guidelines.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Austria (3 of 5)

Direct Tax (3 of 3)

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Austria (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Not specifically regulated or defined in VAT Law. Guidance in VAT Guidelines refers to the exchange of the virtual currency "Bitcoin". Likely this guidance would apply on other cryptocurrencies as well. No further guidelines on crypto currencies included in VAT Guidelines.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Exchange of virtual currency "Bitcoin" for consideration is within the scope of VAT, but VAT exempt. No further comments on VAT treatment of cryptocurrencies in VAT guidelines.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No. General VAT principles apply: NFTs transfer digital assets, e.g. digital artworks. The transfer of NFTs qualifies as supply of services for VAT purposes. VAT exemptions may apply. VAT treatment is not specifically defined in VAT law or official VAT Guidelines.
4. Treatment of NFTs sold in exchange for cryptocurrency?	See above – NFT qualifies as supply of services; cryptocurrency is used as means of payment in this case, hence is treated the as such.
5. Are there any other applicable exemptions relating to cryptoassets?	Other financial transactions in respect to cryptocurrencies (such as options over cryptocurrencies) should be VAT exempt. There are, however, no legal definitions or other guidelines in this respect.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No legal definition in VAT law. Based on general understanding, a marketplace would be a "place" where one could offer its goods or services. An online marketplace would be a trading platform where one can offer its goods/services that does not require significant human input.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	In many cases this would be the marketplace. To be reviewed on a case by case basis.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.

Austria (5 of 5)

Indirect Tax (2 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Belgium (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is no specific legislation regarding the taxation of crypto assets in Belgium. The Finance Minister confirmed in 2021 that general tax law principles apply. Legal certainty about the tax treatment of crypto assets can be obtained through an advance ruling from the Belgian Ruling Commission. The Belgian Tax Authorities have published a questionnaire to determine the tax treatment of capital gains related to the sale of cryptocurrencies. There is some specific guidance on dealing with cryptocurrency from a Belgian GAAP perspective. In Belgium, the tax position follows local GAAP (unless the tax law were to deviate from it). As such, this guidance indirectly influences the tax outcome.
2. If "yes", what is the scope of taxability?	**Corporate Income Tax**: Any income derived from cryptocurrency activities by a Belgian corporate entity or a permanent establishment of a foreign entity is subject to the regular Belgian corporate income tax system. Belgian entities are subject to tax on their worldwide income. **Personal Income Tax**: Individuals subject to Belgian personal income tax are taxed on their worldwide income.
3. What are the direct tax implications?	**Corporate Income Tax**: The statutory tax rate for large businesses is 25%. Specific regimes, (e.g., such as the patent box) may apply depending on the type of activities performed. Crypto losses may be deductible for tax purposes in line with the Belgian GAAP treatment. **Personal Income Tax**: The applicable tax rate depends on the nature of the income. Income from cryptocurrency that arises from the normal management of private assets (e.g., occasional buying and selling of cryptocurrencies) is exempt from Belgian taxation. A legislative proposal is pending that would introduce as of 1 January 2026 a tax rate of 10% for income from cryptocurrency that arises from the normal management of private assets. Note that this regime would generally apply to capital gains related to the alienation of financial assets. Income derived from activities related to cryptocurrencies beyond the normal management of private assets will be taxed at either i) a separate rate of 33% or ii) at progressive rates up to 50% if obtained in the context of a professional activity. Proportional municipality taxes may apply in addition to these federal taxes. Each situation requires a case-by-case analysis, but the following elements are relevant: the frequency of transactions, the amount invested, and the equipment used, etc. Notably, the Belgian tax authorities regard income from mining activities generally as professional income taxable at progressive rates due to the significant investment in hardware, software, and specialized IT knowledge.

Belgium (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	The Belgian government currently believes no specific rules are needed regarding the tax treatment of income from cryptocurrencies. However, this position may change due to the increasing number of questions about the tax treatment of cryptocurrency income. In the absence of specific guidance or legislation, companies and individuals often seek rulings to obtain legal certainty on how these general rules must be applied to specific fact patterns involving cryptocurrencies.
5. What are the tax compliance/ reporting requirements?	Since no specific legislation applies regarding the tax treatment of cryptocurrencies the general filing deadlines apply. **Corporate Income Tax**: The filing deadline of the CIT return for Belgian corporate entities is the last day of the 7th month following the end of the fiscal year, with possible extensions in certain circumstances. In addition, entities subject to corporate income tax must report payments to persons (both natural and legal persons) located in tax havens, if the total amount to the tax haven concerned amounts to EUR 100,000 or more. Failure to report such payments results in non-deductibility of the payments. **Personal Income Tax**: The filing deadline is 30 June of the year following the end of the calendar year, with possible extensions. In addition, individuals must report in their tax declaration if they hold a bank account abroad. If cryptocurrencies are held by a foreign banking, exchange, credit, or savings institution, the reporting obligation generally applies.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No further guidance has been directly issued by the Belgian tax authorities. However, a Directive on Administrative Cooperation ('DAC 8', Council 2023/2226) has been adopted by the Council of the EU on 17 October 2023. DAC 8 expands the scope of the existing EU DAC framework to include crypto-assets and introduces new reporting rules for providers of crypto-asset services.

Belgium (3 of 5)

Direct Tax (3 of 3)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	DAC 8 builds upon the definitions and concepts from the Markets in Crypto-Assets Regulation ('MiCA') and the OECD's Crypto-Asset Reporting Framework ('CARF') to create a coherent and harmonized application across EU Member States.
7. If "yes", is there an indication on the implementation and reporting timeline?	DAC 8 must be transposed into Belgian national legislation by 31 December 2025 and the new provisions must apply latest as of 1 January 2026. The Belgian Government expressed its intention to implement DAC 8 by 31 December 2025, but at the time of writing no text has been submitted to Parliament yet.
8. Are there/do you expect there to be any deviations from the OECD framework?	As mentioned under 6., DAC 8 heavily relies on the definitions and concepts from MiCA. Recital 9 of DAC 8 explicitly states that the OECD's work including commentaries should be used by Member states as a source of illustration and interpretation when implementing DAC 8 into domestic law and to maintain coherent application across Member States. It remains to be seen whether the Belgian legislator will deviate from DAC 8 when implementing the Directive.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable given that at the time of writing the Belgian legislation implementing DAC 8 was not available yet.

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Belgium (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is no specific law, but some guidance is provided by the tax administration on the interpretation of the Belgian VAT Code for cryptocurrency.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Exchange transactions in Bitcoin and other cryptocurrencies are exempt from VAT. This is also the case for intermediary services provided by a third party in the context of an agreement for the transfer of Bitcoins and other cryptocurrencies. Finally, an exemption also applies to financial transactions involving other non-traditional currencies, to the extent that these currencies have been accepted by the parties of a transaction as an alternative means of payment.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no specific definition of NFT in the Belgian VAT legislation, but some guidance is provided by the tax administration on the interpretation of the Belgian VAT Code. NFTs are not considered as a means of payment, but as digital collectibles or digital art objects. Trading in NFTs constitutes a supply subject to VAT, insofar as these transactions take place in Belgium. In addition, the supply of digitised products is generally regarded as a service provided by electronic means. To the extent that the sale of NFTs takes place in Belgium, the standard VAT rate of 21% applies. Finally, since NFTs are not goods, taxable resellers of NFTs cannot invoke the special margin regime of Article 58(4) of the VAT Code
4. Treatment of NFTs sold in exchange for cryptocurrency?	The exemption of Article 44(3)(9) of the VAT Code does not apply, as this applies only to transactions, including negotiation, concerning currency, bank notes and coins used as legal tender, with the exception of collectors' items.
5. Are there any other applicable exemptions relating to cryptoassets?	No specific exemptions.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No specific definition.

Belgium (5 of 5)

Indirect Tax (2 of 2)

Question	Response
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	The standard rules for the VAT liability for services are applicable in accordance with article 51 of the Belgian VAT Code, including these for undisclosed agents (see article 20 of the Belgian VAT Code).
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidance available.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No

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Bulgaria (1 of 3)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes.
2. If "yes", what is the scope of taxability?	For personal income tax the subject of taxation is the realized gains from crypto currencies (sales price minus purchase price, less 10% allowance.
3. What are the direct tax implications?	For personal income tax see the answer to point 2 above. For companies (corporate income tax) the transactions with crypto currencies are treated as transactions of financial assets different from money.
4. Are there any other relevant/noteworthy tax considerations?	As a general rule the f/x differences on fiat currencies is recognized on the spot, while for crypto currencies any f/x differences are recognized at the moment of disposal.
5. What are the tax compliance/ reporting requirements?	Standard accounting requirements (Annual Financial Statement once a year). For CIT/PIT the tax return is submitted once a year.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The Bulgarian tax authorities have not yet issued formal guidance/consultations specifically dedicated to crypto asset reporting or equivalent. Bulgaria has committed to implementing CARF (through the EU DAC8 Directive) by the end of 2025, with reporting obligations expected to start in 2026 – 2027.
7. If "yes", is there an indication on the implementation and reporting timeline?	See point 6 above.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not at this stage.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Bulgaria (2 of 3)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes - there is limited local guidance plus a very important court decision of the European Court of Justice (ECJ) NUMBER c-264/14 which is respected by all EU countries, including Bulgaria.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The sale of cryptocurrency is seen as a VAT exempt supply, based on the above mentioned ECJ decision.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Non-fungible tokens (NFTs) are not defined in Bulgarian tax legislation. In our view these would be seen as intangible rights which are generally subject to 20% VAT.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Barter transaction but the transfer of the NFT would be seen as taxable while the transfer of the cryptocurrency would be seen as exempt.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes - options over cryptocurrency and brokerage in respect of cryptocurrency transactions should be VAT exempt (though no detailed practices exist).
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The VAT Act incorporates EU rules on electronic interfaces that facilitate the supply of goods. Under art. 14a from VAT Act, an electronic interface is defined as a device or a program that allows communication between: • Two autonomous systems, or • A system and a final recipient, And it may cover a website, portal, platform, interface for applications and other similar devices. At present, it is not clear if this definition would apply to crypto-assets (currently it applies to online trade of goods only).
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Generally, the supplier (seller) is liable for VAT. Only in the case when the transaction is seen as an e-service (highly automated with minimum human intervention) and no other supplier is mentioned, the marketplace is liable for VAT.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not aware of such.

Bulgaria (3 of 3)

Indirect Tax (1 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Cabo Verde

Direct Tax (1 of 1)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No. However, while there is no specific guidance or discussion on the taxation of crypto-assets, Law n. º 30/X/2023, as of 21 June 2023, provides guidance in respect of crypto assets definition and crypto asset services, as well as digital banks.
2. If "yes", what is the scope of taxability?	Not applicable.
3. What are the direct tax implications?	No direct tax implications guidance or tax law is in force. Notwithstanding, it should be noted that the sale of crypto assets could fall under Personal Income Tax for individuals, at the general progressive rates, and Corporate Income Tax for companies, at the general tax rate of 21.42%.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Canada (1 of 6)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	**Yes**; The Canada Revenue Agency (CRA), the agency responsible for administering taxes in Canada, published the "Guide for cryptocurrency users and tax professionals" in 2020 which outlines the expected tax treatment of cryptocurrency. It indicated that CRA generally treats cryptocurrency like a commodity for purposes of the Canadian Income Tax Act (the "Act"). **No**; to date, there is no federal or provincial tax direct tax legislation in Canada specific to crypto currencies or transactions involving crypto currencies. However, in the 2022 Canadian Federal Budget, the Minister of Finance announced the government's intention to launch a financial sector legislative review focused on the digitalization of money and maintaining financial sector stability and security. The first phase of the review will be directed at digital currencies, including cryptocurrencies and stablecoins.
2. If "yes", what is the scope of taxability?	CRA's administrative guidance remains the only official insight; absent legislation addressing cryptocurrencies. However; it does not necessarily create a legal obligation to the taxpayer to follow these guidelines. CRA has indicated two main area of taxability as follows: • It will generally treat cryptocurrency like a commodity (e.g. gold and silver bullions) for purposes of the Act. Any income from transactions involving crypto currencies may be treated as business income or as a capital gain, depending on the facts and circumstances. • The income tax treatment for cryptocurrency miners depends on the level and nature of activity. If sufficient commercial and businesslike attributes exist, mining can be considered a business activity and will be taxed as such
3. What are the direct tax implications?	Mining of cryptocurrency may be taxed similar to a business activity subject to the general scheme of the Act. Tax implications of disposition of cryptocurrency would depend on income or capital treatment of the assets itself. The Act generally provides a preferential tax treatment to disposition of capital property by reducing the gain realized on disposition of such property by half.
4. Are there any other relevant/noteworthy tax considerations?	According to the current administrative guidelines and depending on the facts and circumstance; there is a spectrum of possible tax implications that lends itself to ambiguity in this area. Further administrative guidance or legislative intervention may be necessary to provide certainty.

Canada (2 of 6)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements?	Any transactions involving cryptocurrencies should be reported on an annual income tax return. Certain Canadian income tax rules impose a requirement for a "specified Canadian entity" to disclose its ownership of "specified foreign property" to CRA via form T1135 ("Foreign Income Verification Statement"). This obligation arises in respect of a taxation year if the total cost of such property exceeds $100,000 at any time during that taxation year. There are penalties associated with failure to file form T1135: $25 per day for up to 100 days; or significant "gross negligence" penalties equal to 5% of value of the assets (this may not apply when there is significant ambiguity in the law). Digital wallets may be described as either "hot" or "cold" wallets. Hot wallets are digital wallets that are connected to the Internet. Cold wallets are not connected to the Internet and generally take the form of physical storage. If a cold wallet's geographical location of the physical storage is in Canada, the associated holdings are unlikely to be subject to foreign property reporting requirements under the Act. However, if a hot wallet's primary server location is located outside Canada, it is likely to be subject to foreign property reporting requirements under the Act.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes. On August 15, 2025, Finance released draft legislative proposals that create Part XXI of the Act for crypto asset reporting, in alignment with the OECD's CARF. As of the drafting of this document, the proposed legislation has not been finalized, nor have guidance or a proposed reporting schema been released.
7. If "yes", is there an indication on the implementation and reporting timeline?	The CRA has opened the draft legislation for consultation until November 2025. If the legislation is adopted as currently drafted, Part XXI requirements will apply as of January 1, 2026 with the first reporting due in 2027 for the 2026 calendar year.
8. Are there/do you expect there to be any deviations from the OECD framework?	No indication has been made to date, though the proposed legislation does not appear to deviate from the OECD framework.

Canada (3 of 6)

Direct Tax (3 of 3)

Question	Response
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No indication has been made to date.

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Canada (4 of 6)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes, the Excise Tax Act (Part IX of which imposes the Canadian GST/HST) contains a definition of 'virtual payment instrument' which would apply to most cryptocurrencies and deem the supply to be exempt from GST/HST on the basis of being a financial service. The legislation relating to cryptoasset mining activities generally denies input tax credit claims by miners but also deem that any fee, reward or payment for the mining activity received by the miner not to be a supply for GST/HST purposes and therefore not subject to GST/HST. However, mining activities that are not provided to a mining group operator and whose identity is known to the miner are GST/HST taxable in which case the miner is entitled to claim input tax credits and required to collect any applicable GST/HST.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	A 'virtual payment instrument' is included in the definition of a 'financial instrument' and therefore the supply of a cryptocurrency that qualifies as a virtual payment instrument is a GST/HST exempt supply of a financial service. A virtual payment instrument is a 'digital representation of value', that functions as a medium of exchange and that only exists at a digital address of a publicly distributed ledger. Excluded from the definition are: • property that confers a right (present or future, absolute or contingent) to be exchanged or redeemed for money or for specific property or services; and • property that is for use in a gaming platform, affinity or rewards program or similar platform or program Also excluded is "prescribed property", but no regulations have been proposed or passed to prescribe property for this purpose.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Non-fungible tokens (NFTs) are not defined in the Excise Tax Act. NFTs are generally subject to GST/HST as the supply of an NFT is considered the supply of an intangible personal property (IPP) for GST/HST purposes (i.e. it does not fall within the definition of a 'virtual payment instrument').

Canada (5 of 6)

Indirect Tax (1 of 3)

Question	Response
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent? (cont'd)	For GST/HST purposes, a supply of IPP is generally deemed to be made in Canada if the IPP may be used in whole or in part in Canada. Assuming that there are no restrictions on where the NFT may be used, when a person sells an NFT that is IPP through a business carried on in Canada and that person is not a small supplier, GST/HST would apply to the supply of the NFT unless the supply is otherwise GST/HST exempt or zero-rated. A supply of an NFT that is IPP may be conditionally zero-rated in certain circumstances where the supply is made to a non-resident person that is not GST/HST registered at the time that the supply is made.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Taxable for Canadian GST/HST purposes subject to possible zero-rating for NFTs sold to unregistered non-residents.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes – options over cryptocurrency and brokerage in respect of cryptocurrency transactions that are GST/HST exempt (as long as the cryptocurrency qualifies as a virtual payment instrument)
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, the Excise Tax Act contains a definition of a 'specified distribution platform' and a 'distribution platform operator' as follows: **Specified distribution platform** means a digital platform through which a person facilitates the making of specified supplies by another person that is a specified nonresident supplier or facilitates the making of qualifying tangible personal property supplies by another person that is not registered under the normal registration regime. **Distribution platform operator**, in respect of a supply of property or a service made through a specified distribution platform, means a person (other than the supplier or an excluded operator in respect of the supply) that • Controls or sets the essential elements of the transaction between the supplier and the recipient; • If the above does not apply to any person, is involved, directly or through arrangements with third parties, in collecting receiving or charging the consideration for the supply and transmitting all or part of the consideration to the supplier; • Is a prescribed person (no person is currently prescribed).

Canada (6 of 6)

Indirect Tax (1 of 3)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes? (cont'd)	A supply of an NFT (that does not qualify as virtual payment instrument) to an unregistered recipient could constitute a 'specified supply' for GST/HST purposes (which would be conceptually similar to ESS/ remote services as defined in other jurisdictions) unless the NFT • cannot be used in Canada • relates to real property situated outside Canada, or • relates to tangible personal property ordinarily situated outside Canada.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Marketplace.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No. If the cryptocurrency qualified as a virtual payment instrument, the interest earned on the loaned cryptocurrency should qualify as GST/HST exempt supply of a financial service.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not at this stage for Indirect Taxes.

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Chile (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – tax authority guidance issued through 17 rulings (first ruling issued in 2018). • Tax authority Q&A on taxation of cryptocurrencies also available. • No specific direct tax law on cryptocurrency
2. If "yes", what is the scope of taxability?	Chilean IRS has not issued a ruling on the specific definition of a VDA. It has issued rulings on specific types of VDAs, as follows: In the first ruling the tax authority utilized the following definition of bitcoin: "digital or virtual asset, supported by a single digital record called blockchain, deregulated, disintermediated and not controlled by a central issuer, whose price is determined by supply and demand." This year Chilean IRS also utilized a broad definition of NFT: "In very general terms, it can be understood that they consist of digital certificates of authenticity that, through blockchain technology, are used to record the ownership of an asset."
3. What are the direct tax implications?	**In the hands of seller**: Income from transfer of VDA taxable under general Chilean Income Tax regime, this is First Category Tax (Chilean CIT) and Global Complementary Tax or Additional Tax (Chilean WHT). Capital gain determined by deducting from the sale minus acquisition cost indexed by inflation. Gas fees are not considered part of the acquisition cost, but deductible as expenditure. **In the hands of recipient**: **Airdrop:** Chilean IRS has interpreted that acquisition cost is nil. **Mining:** Acquisition cost equals the average trading / market value in CLP that such VDA has in the day it was received in return for mining. **In the hands of Exchanges/ Brokers (including Foreign Exchanges/ Brokers):** No specific withholding or tax applied over VDAs. Their income for intermediation is subject to the general Chilean income tax regime.

Chile (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	• **Valuation rules:** as referred to above, specific rules for valuation in the case of airdrop and mining. • **Cost flow method:** In principle FIFO however Chilean IRS has also interpreted that weighted average cost can also be applied. • **Tax losses:** can be deducted and carried forward according to general rules by virtue of administrative interpretation of Chilean IRS
5. What are the tax compliance/ reporting requirements?	**In the hands of seller**: • Filing annual Income-tax return to determine income tax result derived from capital gains / losses on VDA transactions **In the hands of Exchange/ Broker**: • Yearly Form 1891 that considers digital assets within the scope of reporting • Filing annual Income-tax return
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes. In August 2025, Chilean IRS issued Resolution 113 and 114 mandating Chilean Cryptoassets Service Providers (“CASP”) to submit Annual Sworn Statements informing transactions information by Chilean and foreign taxpayer performed through them, following CARF standards. Regarding foreign taxpayers, information will be shared under CARF.
7. If “yes”, is there an indication on the implementation and reporting timeline?	Sworn statements submitted annually. First report due on June 30th 2026 on transactions of Calendar Year 2025.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Chile (3 of 5)

Direct Tax (3 of 3)

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Chile (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – tax authority guidance issued through 17 rulings (first ruling issued in 2018). • Tax authority Q&A on taxation of cryptocurrencies also available. • No specific indirect tax law on cryptocurrency nor any mention on Chilean VAT Law (Decree Law No. 825-1974)
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Cryptocurrency is excluded from VAT provided that it is not a corporeal asset. Chilean IRS has not issued a ruling on the specific definition of a VDA. It has issued rulings on specific types of VDAs, as follows: In the first ruling the tax authority utilized the following definition of bitcoin: "digital or virtual asset, supported by a single digital record called blockchain, deregulated, disintermediated and not controlled by a central issuer, whose price is determined by supply and demand."
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not defined in Chilean VAT Law. Only through a ruling (No. 1422-2023) Chilean IRS stated that: "In very general terms, it can be understood that they consist of digital certificates of authenticity that, through blockchain technology, are used to record the ownership of an asset." **No specific pronouncement on by Chilean IRS.** **Based on other rulings on VDA issued by Chilean IRS, being that NFTs are also not corporeal goods, it is reasonable to sustain that no VAT on the sale of NFT.**
4. Treatment of NFTs sold in exchange for cryptocurrency?	No specific rulings issued. No VAT is expected to apply.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.

Chile (5 of 5)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No specific guidance on tokenization issued by Chilean IRS. Also note that there is no specific regulation on the legal mechanics of tokenization in Chile. Bering the above into consideration, it is reasonable to understand that the token has a different legal nature than the underlying asset.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	One ruling (No. 3017-2022) and does not contain specific guidance on De-Fi.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No,

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Croatia (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is no specific legislation or published guidance on the tax treatment of cryptocurrency from corporate income tax perspective in Croatia.
2. If "yes", what is the scope of taxability?	In the absence of specific legislation or guidance, cryptocurrencies are taxed under the general tax rules. Namely, Croatian entities are subject to corporate income tax for their worldwide income. As a result, any income derived from cryptocurrency activities is subject to Croatian corporate income tax.
3. What are the direct tax implications?	Any income derived from cryptocurrency activities will form part of the company's overall income. The corporate income tax rates are 10% if taxpayer's annual revenues are below EUR 1m, or 18% if this threshold is exceeded.
4. Are there any other relevant/noteworthy tax considerations?	Corporate income tax is based on the accounting rules, thus disclosure of cryptocurrency has to be assessed primarily from the relevant accounting perspective (IFRS or local GAAP, whichever the company applies)
5. What are the tax compliance/ reporting requirements?	There are no specific tax compliance/reporting requirements for cryptocurrency. Tax payers are required to submit their annual corporate income tax return within four months after their year-end.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Ministry of Finance announced that provisions of EU DAC8 will be implemented in Crotian Act on Administrative Cooperation in the Field of Taxation
7. If "yes", is there an indication on the implementation and reporting timeline?	The new rules will be transposed into national law with the first application for most provisions from 1 January 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	Croatia will implement EU DAC8, which is broadly aligned with the OECD framework.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Croatia (2 of 4)

Direct Tax (2 of 2)

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Croatia (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes. The Croatian Tax Administration ("CTA") issued an official opinion with respect to the mediation in the purchase and sale of a virtual currency "bitcoin" in 2015.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	In the official opinion, the CTA was dealing with the purchase and sale of the virtual currency – "bitcoin", whether the transactions, including mediation with virtual currencies such as "bitcoin", are exempt from VAT. The CTA concluded that, for the VAT purposes, transactions, including mediation with respect to the virtual currencies such as "bitcoin" should be VAT exempt. However, the CTA also mentioned in its opinion that depending on the judgment in case C-264/14, the VAT treatment of a virtual currency "bitcoin" in Croatia could be changed. Since the opinion of the CTA is from 2015, and in the meantime the judgment in the case has been passed, the VAT treatment from the judgment should be applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Please note that we do not have any practice with this respect.
5. Are there any other applicable exemptions relating to cryptoassets?	Please note that we do not have any practice with this respect.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

Croatia (4 of 4)

Indirect Tax (2 of 2)

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Cyprus (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No, Cyprus does not have a specific direct tax law or guidance regarding the tax treatment of cryptocurrencies.
If yes: **2. What is the scope of taxability?**	In the absence of explicit provisions, reference should be made to the general provisions of the Cyprus income tax law. The distinction between 'trading' and 'capital' nature is important in the context of Cyprus taxation as it determines how cryptocurrency profits are taxed.
3. What are the direct tax implications?	In principle, persons (corporates or individuals) deriving realised profits from ventures in the nature of trade are treated as ordinary business income subject to Cyprus income tax law. Any unrealised changes in the fair value should not be taxable. The applicable tax rates are: • **Corporates:** 12,5% flat tax rate • **Individuals:** Progressive tax rates ranging from 0% to 35%. Capital nature gains should not be taxable since they fall outside the scope of Cyprus income tax law. Each case should be evaluated on its own merits to determine its classification.
4. Are there any other relevant/noteworthy tax considerations?	In the absence of explicit law provisions or guidance, a taxpayer can confirm the tax outcome of a specific scenario in advance with the Cyprus tax authorities through a formal tax ruling request.
5. What are the tax compliance/ reporting requirements?	There are no tax compliance and/or reporting requirements specific to cryptocurrencies. Cyprus tax resident (corporates or individuals) should declare their worldwide income (including any gains from cryptocurrencies) through their annual tax return.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	In November 2024, the Cyprus Ministry of Finance announced the signing of the multilateral competent authority agreement on the automatic exchange of information pursuant to the Crypto-Asset Reporting Framework.
If yes: **7. Is there an indication on the implementation and reporting timeline?**	The new rules will be transposed into national law with the first application for most provisions from 1 January 2026.

Cyprus (2 of 4)

Direct Tax (2 of 2)

Question	Response
8. Are there/do you expect there to be any deviations from the OECD framework?	Cyprus will implement EU DAC8, which is broadly aligned with the OECD framework.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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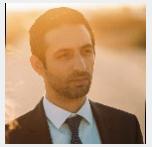

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Cyprus (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There are currently no provisions in the Cyprus VAT law governing the VAT treatment of digital/virtual currencies (i.e. cryptocurrencies), nor any provisions in the EU VAT Directive which consists of the legislation for uniform VAT treatment within the EU. A draft unpublished VAT circular has been prepared by Cyprus Tax Authorities which sets a preliminary guidance for the taxpayers in order to understand the potential VAT implications arising from transactions involving cryptocurrencies, payment tokens, and other related activities.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	As proposed in the draft unpublished VAT circular, under the current VAT framework, digital currencies that are exchanged for conventional currencies (such as euros, pounds, or dollars) are not subject to VAT. Any charges levied in addition to the value of the digital currencies (i.e. for the settlement or process of transactions) are treated as exempt from VAT under article 135(1)(d) of the EU VAT Directive. The above are further enhanced via the decision of the CJEU case C-264/14, where the court decided that transactions involving the exchange of contractual currencies for 'bitcoin' units and vice versa constitute the supply of services for consideration within the interpretation of the VAT Directive. However, it was ruled that such transactions are exempt from VAT under the provision referring to transactions relating to "currency, banknotes and coins issued as legal tender" (Articles 135(1)(d) and (e) of the VAT Directive).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No, neither Cyprus VAT law, nor the EU VAT Directive defines or analyses NFTs.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No guidance exists in relation to this.
5. Are there any other applicable exemptions relating to cryptoassets?	If the cryptoassets are in the form of cryptocurrencies, then the provisions as analysed in C-264/14 may be applicable, please refer to the analysis in question 2. However, no guidance exists in relation to this.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	There is no definition of marketplace. However, following the VAT e-commerce explanatory notes of the European Union, a marketplace falls under the definition of electronic Interface. An electronic interface is a broad concept which allows two independent systems or a system and the end user to communicate with the help of a device or programme.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No guidance exists in relation to this.

Cyprus (4 of 4)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidance exists in relation to this.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No guidance exists in relation to this.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No guidance exists in relation to this.

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Czech Republic (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	The Czech Tax Authorities and the Ministry of Finance have issued guidance on the treatment of cryptocurrencies, providing basic information. Cryptocurrencies are generally not considered a currency but are treated as inventory and taxed accordingly, based on general taxation principles. Under the new legislation that came into force on 15 February 2025, certain income of individuals (non-entrepreneurial traders) from the transfer of crypto-assets for consideration is exempt from personal income tax, provided that both the income threshold test and the time test are met.
2. If "yes", what is the scope of taxability?	The profit from cryptocurrencies is taxable when selling / exchanging it for fiat currency (EUR, USD, CZK etc.), or when exchanging it for another cryptocurrency. A cryptocurrency profit should also be calculated when purchasing goods or services for cryptocurrencies
3. What are the direct tax implications?	In case that the taxpayer (corporation or individual) realizes taxable income: For individuals: Profits are subject to progressive income tax rates of 15% or 23%, depending on the total taxable income. The specific tax treatment depends on whether the individual's cryptocurrency activities are classified as:(i) business income (from entrepreneurial activities), or (ii) other types of income. If classified under (ii) — other types of income — income from the transfer of crypto-assets for consideration incurred on or after 15 February 2025 may be exempt from personal income tax, provided that both of the following conditions are met: the income threshold test (total exempt income does not exceed CZK 40 million per year; this threshold is shared with income from the sale of securities and shares in corporations), and the time test (the crypto-assets were held for at least 3 years prior to the transfer). For corporations: The profit is included in the general tax base of the corporation and subject to corporate income tax rate of 21%. Tax deductibility of other related costs will be governed by standard tax-deductibility rules.

Czech Republic (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	The Czech income tax of corporations and selected individuals (who are obliged to maintain accounting books) is based on CZ GAAP profit or loss result. For this reason, cryptocurrency transactions need to be primarily properly treated from the accounting perspective.
5. What are the tax compliance/ reporting requirements?	There are no specific cryptocurrency reporting requirements for tax purposes. Taxpayers are obliged to fulfill their standard income tax obligations. Income tax returns must be filed within three months of the end of the tax period. If filed electronically, the deadline is postponed by one calendar month, if filed by a registered tax advisor, or if the taxpayer is subject to a mandatory accounting audit, the corporate income tax return filing deadline is extended to six months.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The EU Directive DAC8 - a wider reporting requirements for crypto and other transactions is currently implemented. into Czech national law. DAC8 extends the scope of automatic exchange of information under DAC to information that will have to be reported by crypto-asset service providers on transactions (transfer or exchange) of crypto assets and e-money. The provisions of DAC8 on due diligence procedures, reporting requirements, and other rules applicable to crypto-asset service providers largely reflect the Crypto-Asset Reporting Framework (CARF) and a set of amendments to the Common Reporting Standard (CRS)
7. If "yes", is there an indication on the implementation and reporting timeline?	The DAC8 Directive must be transposed by 31 December 2025.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not analysed.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not analysed.

Czech Republic (3 of 5)

Direct Tax (3 of 3)

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Czech Republic (4 of 5)

Indirect Tax (2 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – but a very general one respecting the EU approach.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	In line with CJEU C-264/14 Skatteverket, cryptocurrency is considered to be an alternative means of payment. Mining of cryptocurrency for own purposes of the taxable person is considered as out of scope of VAT. Trading with cryptocurrency is considered as an economic activity generally VAT exempt.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no guidance for NFTs in the Czech Republic. We assume that the NFT would be treated based on the underlying supply/asset.
4. Treatment of NFTs sold in exchange for cryptocurrency?	There is no guidance in the Czech Republic. We assume the cryptocurrency can be considered as a payment instrument for the NFTs representing certain underlying supply/asset.
5. Are there any other applicable exemptions relating to cryptoassets?	Not aware of any.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	There is no specific definition of a "marketplace", but the Czech VAT law provides for definition of the operator of an electronic interface. It is considered to be a person liable for tax who, through the use of an electronic interface, especially an electronic marketplace, platform, portal, or similar means, facilitates the delivery of goods or the provision of services in accordance with a directly applicable regulation of the European Union that specifies implementing measures for the directive on the common system of value-added tax.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Marketplace.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.

Czech Republic (5 of 5)

Indirect Tax (2 of 2)

Question	Response
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No – there is no Czech specific guidance. This topic is governed by the rules for ESS valid across the EU.

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Denmark (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Currently, there is no specific legislation governing the taxation of cryptocurrency in Denmark. The Danish Tax Authorities provide limited guidance on the subject through their official website and legal guide. According to the legal guide, cryptocurrency is taxed under the general rules of tax legislation and may be classified differently for tax purposes depending on its specific characteristics. In recent years, an increasing amount of case law has emerged regarding cryptocurrency taxation. These cases primarily focus on whether cryptocurrency transactions are speculative in nature – making them taxable – or if they qualify as non-speculative private assets. The legal guide offers an overview of the current framework for cryptocurrency taxation, reflecting the latest developments in case law.
2. If "yes", what is the scope of taxability?	There is not yet a definition of crypto assets in Danish tax law.
3. What are the direct tax implications?	Currently, cryptoassets are treated according to the State Tax Act's rules on speculation taxation, which involves a subjective assessment of the crypto owner's intention with the acquisition at the time of purchase. As a main rule, trade with crypto is per default considered speculative. **Employee Tax:** Any transaction which is considered for speculative purposes is taxable on the gain. Gains is taxed as personal income at a marginal rate up to 52.10%, while losses are deducted with a tax value of approx. 25%. The gain is calculated as the difference between the price of disposal and the acquisitions cost. The FIFO method is applied separately for each type of cryptocurrency.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	**Employee Tax:** Capital gain/loss and receiving income is reported in the annual tax return (individual online form). The gain is stated in the annual tax return in box 20 for the individual, while any loss is stated in the annual tax return in box 58 according to the Danish Tax Authorities guidelines.

Denmark (2 of 5)

Direct Tax (2 of 3)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	**Employee Tax:** The Danish Tax Council has published a report in October 2024, which provides new recommendations and guidance on how cryptocurrency should be taxed in the future in Denmark. The Danish Tax Council recommends taxing cryptocurrencies based on the mark-to-market principle. This approach involves taxing any annual increase in the value of cryptoassets, regardless of whether the assets have been sold or which type of cryptocurrency is involved.
7. If "yes", is there an indication on the implementation and reporting timeline?	**Employee Tax**: Currently the recommendations are only reflected in the report. However, it is expected that the Danish Parliament will propose a new law in late 2025/2026, taking into consideration the recommendation regarding taxation of cryptocurrency on a mark-to-market principle.
8. Are there/do you expect there to be any deviations from the OECD framework?	According to the report from The Danish Tax Council no deviations from the OECD framework are to be expected.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	The OECD (Organisation for Economic Co-operation and Development) has developed a set of guidelines and recommendations for the taxation of cryptocurrency. These guidelines are not binding but serve as a guide for member countries. The OECD's approach focuses on ensuring transparency, preventing tax evasion, and ensuring that cryptocurrencies are taxed fairly. In Denmark, the taxation of cryptocurrency is regulated by the Danish Tax Agency (Skattestyrelsen). The Danish rules are more specific and binding for taxpayers in Denmark i.e. taxation of gains, deduction for losses and reporting obligations. The differences are: • **Binding Nature:** The OECD guidelines are advisory, while the Danish rules are binding for taxpayers in Denmark. • **Specific Rules:** The Danish rules are more detailed and specific, especially regarding the taxation of gains and deductions for losses. • **Reporting Requirements:** While the OECD recommends reporting for transparency, it is a legal obligation in Denmark.

Denmark (3 of 5)

Direct Tax (3 of 3)

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Denmark (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is limited practice in the form of the legal guidance (in Danish “Den Juridiske vejledning” from the Danish Tax Agency as well as few official binding rulings.
2. If “yes”, what is the position for GST / VAT / ESS or equivalent?	• Bitcoin transactions are VAT exempt. • Bitcoin mining was regarded in a specific case as falling outside the scope of VAT. • Sale of virtual currency for gaming and betting was regarded in a 2023 case as subject to VAT. • Sale of virtual art was in a 2022 case regarded as subject to VAT. However, sale of virtual art can be VAT exempt as artistic work according to a 2023 case. • There is no local case law on other non-traditional currency transactions (e.g. fiat, utility/security tokens/NFT).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not applicable.
5. Are there any other applicable exemptions relating to cryptoassets?	Please refer to the above.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Denmark (5 of 5)

Indirect Tax (2 of 2)

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Estonia (1 of 5)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is nothing specific in the income tax law regarding cryptocurrency, however, there is guidance from the tax authorities.
2. If "yes", what is the scope of taxability?	The scope of the guidance provided is income generated through cryptocurrency, for example: • by a change in the price of cryptocurrency in the event of the sale or exchange of cryptocurrency into regular currency or another cryptocurrency; • when paying for goods or services in cryptocurrency; • while cryptographic mining; • computer data rental (renting out storage capacity); • cryptocurrency received as wages. Taxable income received in cryptocurrency, such as rent, interest, business income, etc., is also subject to income tax.
3. What are the direct tax implications?	Income received in cryptocurrency (gains from the transfer of property, income from employment, business income) is taxed on a similar basis as income received in traditional currency. Income as a result of a stake, often called a bonus, Is considered as interest on borrowing cryptocurrency and must be declared respectively. As regards the taxation of virtual income, the purchase or sales price or received income has to be converted into euros at the exchange rate of cryptocurrency (market price) applying on the date of receipt of the income or costs.
4. Are there any other relevant/noteworthy tax considerations?	No.
5. What are the tax compliance/ reporting requirements?	If a private person receives income from trade, purchase and sale of cryptocurrency or from the exchange of cryptocurrency against another crypto- or traditional (fiat) currency, the received income must be declared in the income tax return (FIDEK) annually. As of 2025, trading losses can be taken into account similarly to securities. Previously it was not possible.

Estonia (2 of 5)

Direct Tax (2 of 2)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	The gain is calculated based on the transaction as the difference between the selling price and the purchase price, or, in the case of exchange, between the price of received property and the purchase price of the cryptocurrency. If a natural person decides to start or to continue investing in cryptocurrency as a company (legal entity), he/she must take into account the corporate taxation rules. A resident company pays income tax on the distribution of profits, i.e. on the payment of a dividend at the rate of 22/78. Benefits granted by the employer (fringe benefits) to employees are subject to income tax at the rate of 22/78 and social tax at the rate of 33%. Expenses or payments made by a resident company, which are not related to the company's business, are subject to income tax at the rate of 22/78.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Estonia (3 of 5)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Crypto Assets Market Act, which refers to the concepts defined in the Regulation 2023/1114, has been adopted in mid-2024. There is nothing specific in the VAT law. Yes, there is some guidance from the tax authorities in respect of cryptocurrency and related topics.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Transactions involving non-traditional currencies, i.e. currencies which are not legal tender, are nevertheless to be treated as financial transactions provided that the parties to the transaction accept these currencies as alternatives to legal tender. In general, digital wallet services are software, which allow to store the personal keys of the user of blockchain. In this case, the digital wallet service is merely technological and qualifies as a technological aid. Thereby, the digital wallet service itself does not allow to execute cryptocurrency transactions. Storing personal keys is not the ultimate goal for users. It is important to note that in the case of a paid digital wallet service, VAT taxation depends on the content of the wallet service and, in certain cases, the exemption from VAT for financial services may apply to wallet services. If the digital wallet service enables, in addition to depositing a cryptocurrency considered to be means of payment, transactions with the referred cryptocurrency, which create rights and obligations in relation to that means of payment, and which are regarded as a financial service within the meaning of the §16 (21) of the Value-Added Tax Act, the exemption from VAT for financial services provided for in §16 (21) of the VAT Act applies. A paid service which gives access to a software application and the purpose of which is to enable the recipient of the service to use the platform is subject to regular VAT depending on the recipient of the service. The service of using a platform is not a financial service and is therefore not exempt from VAT under the VAT Act. Depending on the contractual arrangements and activities of miners, mining could be regarded as a supply of services to others. Considering that mining is sufficiently linked to cryptocurrency, it is exempt from VAT, while input VAT on goods and services acquired for mining purposes is not deductible. Mining for own purposes is not regarded as economic activity and thus it does not give right to deduct input VAT
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs are not defined. May be subject to VAT depending on the underlying asset or service.

Estonia (4 of 5)

Indirect Tax (2 of 3)

Question	Response
4. Treatment of NFTs sold in exchange for cryptocurrency?	Cryptocurrency payment leg is the same as payment in legal tender (it is not supply). Supply of NFTs carries its own VAT liability.
5. Are there any other applicable exemptions relating to cryptoassets?	Payment and currency exchange services are exempt from VAT pursuant to the §16 (2^1) 4) of the VAT Act.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, there is a definition of online marketplace in the Cybersecurity Act which has a wider ambit than just ESS. Online marketplace (Cybersecurity Act §2 5): 'online marketplace' means an information society service that allows consumers and traders, for the purposes of the Consumer Protection Act, to conclude online sales or service contracts either on the online marketplace's website or on a trader's website that uses computing services provided by the online marketplace
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No specific rules. In general, a marketplace is liable for VAT on supply of an ESS to a customer. If the underlying asset of NFT is ESS, the marketplace may be liable to pay VAT depending on its role in the supply.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Estonia (5 of 5)

Indirect Tax (3 of 3)

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Finland (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No direct tax law, but there is a detailed guidance by the Finnish Tax Administration (FTA) called "Taxation of virtual currencies". The guidance comprises the tax treatment of virtual currencies from the perspectives of individual income taxation, corporate taxation and VAT. In addition, there is a "law on crypto asset services providers and crypto asset markets that came into force during 2024."
2. If "yes", what is the scope of taxability?	No direct tax law. According to the ruling of the Finnish Supreme Administrative Court (KHO 2019:42), transfers of virtual currencies are subject to the capital gains tax rules in accordance with the Income Tax Act (ITA). However, they are not treated as securities. According to the ruling of the Helsinki Administrative Court (HHAO 18/0426/3) an exchange of virtual currency to another virtual currency triggers capital gains taxation. Furthermore, according to the FTA's guidance any event, in which a virtual currency is used, triggers (capital gains) taxation. Every increase or decrease in the value of a virtual currency position is taxable separately e.g. when: • Virtual currency is traded for any legally established currency regardless of whether the currency remains e.g. in a broker's account. • Virtual currency is used to pay for goods or services. • Virtual currency is exchanged for another virtual currency. For tax purposes, every instance of spending, using, selling or trading virtual currency triggers (capital gains) taxation and is treated as a separate transaction. If virtual currency units were acquired through multiple transactions, the increase or decrease in value that had resulted from each transaction must be calculated separately. When calculating the changes in value, virtual currency is deemed to have been spent in the same order as it was acquired unless the taxpayer proves otherwise. (FIFO).

Finland (2 of 5)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications?	**Individual taxation** • If subject to capital income taxation, 30% tax rate will apply up to 30k EUR capital income and 34 % tax rate to capital income exceeding 30k EUR. • If treated as earned income, subject to progressive tax rate depending on annual earned income (as well as municipality tax, church tax). **Corporate taxation (limited liability companies)** Subject to 20 % CIT rate.
4. Are there any other relevant/noteworthy tax considerations?	Income received from online games is treated as earned income. Income received from virtual currency mining activities (Proof of work protocol) is treated and taxed as earned income. Income received from virtual currency staking (Proof of stake protocol) is treated and taxed as capital income.
5. What are the tax compliance/ reporting requirements?	Income from the sale (or any other event that triggers capital gains or losses taxation) must be included and declared in the individual's/company's income tax return regardless of whether it has been accrued abroad or not and in which currency. Same applies to income from mining or staking.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes. On the Finnish Tax Administration's website there is an announcement regarding DAC8 and crypto asset reporting framework CARF In addition, there is reporting guidance, FIFO calculator as well as e.g. an FAQ section.
7. If "yes", is there an indication on the implementation and reporting timeline?	https://www.vero.fi/en/detailed-guidance/guidance/48411/taxation-of-virtual-currencies3/ https://www.vero.fi/tietoa-verohallinnosta/uutishuone/verotuksen_muutoksia/kryptovarapalveluille-uusi-tiedonantovelvollisuus-vuonna-2026/ CARF has been implemented to national law and applied from 1 January 2026. DAC8 transfer of information between EU member states will also begin in 2027.
8. Are there/do you expect there to be any deviations from the OECD framework?	No.

Finland (3 of 5)

Direct Tax (3 of 3)

Question	Response
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No.

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Finland (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No law. The Finnish Tax Administration has published guidelines on cryptocurrency with short comments on VAT referring to ECJ case C-264/14, Hedqvist.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Cryptocurrencies are considered as means of payment and VAT exemptions related to financial services may apply.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No definition to NFTs in the Finnish VAT Act. The Finnish Tax Administration defines NFT as a unique digital code that identifies the ownership of a special commodity - usually a digital item such as a tweet, drawing, piece of music, or an image.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The supplies of NFT are in general subject to VAT, however, should be evaluated case by case depending what kind of asset the NFT represents. Cryptocurrency is considered as a means of payment with similar effects as payment in euros.
5. Are there any other applicable exemptions relating to cryptoassets?	Relating to cryptocurrencies. Please see Q2.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Electronic interface means an electronic marketplace, platform, portal or similar tools.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	A marketplace is liable for VAT on the sale of an electronic service to a customer. If the NFT represents an electronic service, the marketplace may be liable to pay the VAT depending on the role of the market place.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Finland (5 of 5)

Indirect Tax (2 of 2)

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Germany (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is tax authority guidance in Germany (see below).; In Germany, there are no direct tax laws that apply specifically for cryptocurrencies or transactions involving cryptocurrencies. Crypto assets are taxed according to the general taxation rules in Germany.
2. If "yes", what is the scope of taxability?	The German Federal Ministry of Finance ("BMF"), which is responsible for the administration of taxes, published a revised letter on individual questions regarding the income tax treatment of crypto-assets to provide participants in administration and business as well as individual taxpayers with a legally secure and easily applicable guide (BMF letter dated 6 March 2025, Ref. IV C 1 - S 2256/00042/064/043). Currently, the BMF letter is the only official document that is intended to support taxpayers in classifying crypto assets for tax purposes. The German tax treatment of income received from, or charges made in connection with, activities involving crypto assets depends on the activities and the parties involved. In principle, crypto assets are subject to the general taxation rules in Germany.
3. What are the direct tax implications?	The German tax treatment of income received from, or charges made in connection with, activities involving crypto assets depends on the activities and the parties involved. When crypto assets are acquired and held by a corporation and subsequently sold at a value above the acquisition cost, this sale is subject to the general taxation principles. Activities such as crypto mining, forging, and lending also result in operating income at the company level, which is also subject to the general taxation rules. This means that these also are taxable with trade tax and, if applicable, corporate income tax. Different rules apply to private individuals. If crypto assets are acquired and held for longer than one year, this sale is not taxable. If the crypto assets are sold within one year, the taxpayer must pay tax on the capital gain at his individual income tax rate. However, there is an exemption limit in the amount of € 1000. This opinion was confirmed with respect to currency tokens by the German Federal Fiscal Court in 2023. The Federal Fiscal Court ruled that currency tokens qualify as economic goods, with the consequence that the gain resulting from a sale within one year after acquisition is taxable income.

Germany (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	Not specifically with respect to taxes. However, the accounting for German tax purposes and German GAAP differs, depending on the token class. **Currency token:** Currency tokens are not recognized in the German tax balance sheet of the issuer. When currency coins are issued, no accruals, liabilities, or deferred income are recognized in the German tax balance sheet. The sale of currency tokens results in revenue, which increases profit. **Utility token with voucher character:** At the time of the ICO, a liability can be formed in the tax balance sheet if a concrete promise of performance already exists when the token is issued and the acquirer can insist on this performance. **Utility tokens with right to use electronic platforms:** If the platform already has been developed, deferred income is to be recognized. If the platform has not yet been developed, a liability is to be recognized in the amount of the income until completion. **Security token:** Depending on the structure of the token, equity or debt capital needs to be recognized in the balance sheet. If the issuer of a security token enters into an obligation with the issue (e.g., to pay interest or repay principal), a liability has to be recognized in the amount of the fulfillment amount. If the obligation is uncertain, a provision must be recognized. Where security tokens are used for corporate financing and are contractually structured so that the tokens are treated as equity-like participation rights of the issuer, the representative participation right is to be shown on the liabilities side of the issuer´s tax balance sheet.
5. What are the tax compliance/ reporting requirements?	There are currently no special tax compliance or reporting requirements associated with cryptocurrency. Normal tax reporting and compliance rules apply.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The German Ministry of Finance published a draft of a bill to transpose the DAC8 rules into national law on 26 June 2025 (DAC8-Implementation Act). The EU Directive is closely based on the CARF rules.
7. If “yes”, is there an indication on the implementation and reporting timeline?	It is planned that the law comes into force on January 1, 2026. The first reporting period is the calendar year 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	As DAC8 implements CARF rules there are no major deviations in the national bill. In the national bill there are detailed penalty rules compared to CARF and DAC8.

Germany (3 of 5)

Direct Tax (3 of 3)

Question	Response
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No deviations from the CARF is expected.

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Germany (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes –Circular Letter published by the German Federal Ministry of Finance covers the position and sets out the rules.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The exchange of conventional currencies into cryptocurrencies and vice versa is a taxable supply which is VAT exempt. The use of cryptocurrencies is equated with the use of conventional means of payment insofar as they do not serve any purpose other than that of a pure means of payment. The handing over of cryptocurrencies for the mere payment of a fee is therefore not taxable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No. Currently, there is no definition of NFT in the German VAT law or a legal provision or guideline that deals with the VAT treatment of NFTs. Yes, in general the standard 19% rate (domestic transactions). However, a reduced VAT rate at 7% might be applicable in specific cases. See further below in relation to cross border NFT transactions and the ESS / remote services rules.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Single supply of NFT, cryptocurrency payment is disregarded for German VAT purposes.
5. Are there any other applicable exemptions relating to cryptoassets?	Tax exemption for the turnover and the intermediation of the turnover of legal tender applies.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, German VAT Act. For the purposes of this rule, an electronic marketplace is a website or any other means by which information is made available via the Internet that enables a third party that is not the operator of the marketplace to execute transactions.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	In case of a local supply of service (= sale of the NFT) the service provider / seller is liable to pay the VAT. The reverse charge mechanism (liability to pay VAT is shifted to the service recipient/buyer of the NFT) applies in case of cross border B2B supplies.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage.

Germany (5 of 5)

Indirect Tax (2 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Gibraltar (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is no specific legislation or published guidance on the tax treatment of cryptocurrency in Gibraltar.
2. If “yes”, what is the scope of taxability?	In the absence of specific legislation or guidance, crypto assets are taxed (if applicable) under the general tax rules.
3. What are the direct tax implications?	Capital gains are not taxable in Gibraltar. Trading income which is accrued in and derived from Gibraltar is taxable at the standard Corporate tax rate of 15% . Each case needs to be considered on its own merits to determine if the income is taxable or not.
4. Are there any other relevant/noteworthy tax considerations?	Cryptocurrencies, tokens, and similar awarded to employees may be subject to tax under the benefit in kind rules. Employers have the option to pay any tax liability on behalf of employees. For periods beginning on or after 1 February 2024, businesses which are regulated under Part 7 of the Financial Services Act 2019 to carry on the regulated activity of using distributed ledger technology for the storage or transmission of value belonging to another will be subject to taxation of interest income as a trading receipt. The rules have been widened in scope and apply to any sum accrued as interest or "similar amounts" as defined under Part III, Section 15 of the Income Tax Act 2010. This includes any instrument paying a recurring amount of income calculated by reference to a transaction for the lending of money, as well as the lending and staking of virtual assets. Anti-avoidance rules have also been introduced.
5. What are the tax compliance/ reporting requirements?	There are no specific tax compliance/ reporting requirements for cryptocurrency. For companies, general rules will apply as follows: • Annual tax returns must be filed nine months after the year end, the tax liability payment deadline will be the same as this. • Two Payments on Accounts to be made, in February and September with any balancing payment of tax due nine months after year end.

Gibraltar (2 of 4)

Direct Tax (2 of 2)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	Benefits in kind should be declared on the P10 / P10A form. This is an annual return which employers are required to file with the Tax Office. Employees also should declare benefits in kind received in their personal tax return. The P10/10A return needs to be filed by 31 July in relation to the tax year ended 30 June. Personal tax returns are required to be filed by 30 November in relation to the tax year ended 30 June.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The Government of Gibraltar has issued an announcement regarding the Crypto-Asset Reporting Framework (CARF). Gibraltar, along with other jurisdictions, has committed to the early adoption of CARF as part of a joint statement on 10 November 2023. This initiative aims to enhance global tax transparency by including crypto assets in the Automatic Exchange of Information (AEOI) framework, with exchanges expected to commence by 2027.
7. If "yes", is there an indication on the implementation and reporting timeline?	Expected to commence by 2027
8. Are there/do you expect there to be any deviations from the OECD framework?	No
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Gibraltar (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No - There is currently no VAT / GST regime in Gibraltar.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not applicable.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not applicable.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

Gibraltar (4 of 4)

Indirect Tax (2 of 2)

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Hong Kong (1 of 4)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – While there is no specific tax provision in the tax law addressing digital assets, the Hong Kong Inland Revenue Department updated the Departmental Interpretation and Practice Notes ('DIPN') No. 39 in March 2020 to include a section on the taxation of digital assets. However, the guidance does not however cover staking, DeFi, or Web3 implications such as NFT and tokenisation of real-world assets. While uncodified, pursuant to the proposed enhancements to the unified fund exemption regime set out in the consultation paper issued by the Financial Services and Treasury Bureau on 25 November 2024, virtual assets are proposed to be added to the scope of qualifying investments applicable under the unified fund exemption regime and in turn also benefit the family-owned investment holding vehicle regime.
2. If "yes", what is the scope of taxability?	The scope of taxability remains in line with Hong Kong's territorial regime whereby onshore sourced profits derived by a person (including an individual, a corporation, a partnership, trustee, whether incorporated or unincorporated) carrying on a trade, profession or business in Hong Kong from such trade, profession or business, other than profits of a capital nature, are subject to Hong Kong profits tax. The DIPN provides certain general guidelines as to how the nature of the profits from a transaction depending on the type of the digital asset involved (i.e. payment token, utility token or security token) together with the underlying intention surrounding the transaction. For instance: • The issuance of a utility token is generally revenue in nature, whereas the issuance of security token generally is capital in nature. • Cryptocurrencies received in the course of a cryptocurrency business (e.g. through airdrops and forks) generally are regarded as business receipts. • The nature (capital vs. revenue) of profits from the disposal of digital assets is determined based on facts and circumstances in regard to established principles. • The broad guiding principle is applied to determine the source of profits arising from cryptocurrency transactions.

Hong Kong (2 of 4)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications?	With respect to the transfer of digital assets **For a transferor subject to Hong Kong profits tax:** Income of a revenue nature sourced in Hong Kong is taxable generally @ 16.5% where expenses of a revenue nature incurred in the production of assessable profits are generally deductible. Capital expenditures are generally not deductible unless otherwise provided for in the tax law(e.g. expenditures for the acquisition of computer hardware, software or systems are generally deductible outright as prescribed fixed assets; other plant and machinery may generally qualify for depreciation allowances). **For a transferee subject to Hong Kong profits tax:** Acquisition of cryptocurrencies should not by itself give rise to any Hong Kong profits tax implications. Subject to the accounting treatment, receipt of cryptocurrencies for free in the course of business may be taxable generally @ 16.5%. Business models of greater complexity (i.e. mining, staking, etc.) should be reviewed based on the businesses' respective value chain and manner of delivery for the direct tax implications. **For Exchanges / Brokers (including Foreign Exchanges / Brokers):** Withholding tax may be applicable to the extent that the digital asset transactions involve the payment of sums from Hong Kong to non-resident persons for the use (commercial exploitation) of intellectual property rights.
4. Are there any other relevant/noteworthy tax considerations?	**Accounting implications** considering that Hong Kong profits tax generally follows accounting. **Transfer pricing implications** since Hong Kong has also implemented transfer pricing rules in line with international standards. **Tax treatment of fair value gains / losses, and crypto borrowing and lending** are not discussed in the DIPN. **Employment income** received in the form of digital assets remains subject to salaries tax.

Hong Kong (3 of 4)

Direct Tax (3 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements?	With respect to the transfer of digital assets For a transferor subject to Hong Kong profits tax: • Filing annual profits tax returns (and reporting the relevant income therein) For an Exchange / Broker: • Filing of annual profits tax returns for non-residents and payment of tax withheld (with regard to sums paid for the use of intellectual property rights) as applicable
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Not from the tax authorities. However, the Hong Kong Government informed the Global Forum on Transparency and Exchange of Information for Tax Purposes of the Organisation for Economic Co-operation and Development ('OECD') on 13 December 2024 its commitment to implement CARF.
7. If "yes", is there an indication on the implementation and reporting timeline?	The Secretary for Financial Services and the Treasury indicated that the Hong Kong Government aims to commence the first automatic exchanges with relevant jurisdictions under CARF from 2028, with an initial plan that the necessary local legislative amendments can be put in place by 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	The Government has yet to indicate how local legislation will be made so it has yet to be seen if there will be any deviations. Nonetheless, it is likely that deviations, if any, will be limited against the OECD framework.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Hong Kong (4 of 4)

Indirect Tax

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is no GST / VAT / ESS regime in Hong Kong.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not applicable.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not applicable.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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Hungary (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes.
2. If "yes", what is the scope of taxability?	The regulation is included under the Act CXVII of 1995 on Personal Income Tax covering the taxation of crypto assets. It is applicable since 1 January 2022. The regulation covers the income from trading and mining of crypto-assets by private individuals. According to the Hungarian regulation income from transactions with crypto-assets shall mean **profit realized on any transaction(s) in non-crypto-assets** executed by the private individual **in respect of crypto-assets during the tax year.** Crypto-crypto transactions are not taxable, only fiat-crypto or crypto-fiat transactions. Transaction executed in respect of crypto-assets shall mean any transaction that may be concluded by and available to any person for the transfer, assignment of crypto-assets (including the exercise of rights stemming from crypto-assets) where the private individual acquires a profit by means other than crypto-assets. **Profit** shall be considered realized (in respect of the excess amount) if the sum of the proceeds from transactions executed in the year is higher than the certified expenditure in that year relating to the acquisition of crypto crypto-assets and transaction fees and commissions, including certified expenses not directly connected to any given transaction, incurred in connection with holding crypto-assets. **Loss** shall be considered realized (in respect of the excess amount) if the sum of the above above-mentioned annual expenditures is higher than the proceeds from transactions executed in the year.
3. What are the direct tax implications?	Income from crypto transactions are subject to 15% personal income tax in Hungary. When determining the exact amount of the transaction, the acquisition costs and other expenses are deductible. If the crypto asset is acquired in the given year by way of participating in the production of crypto-assets (mining) or in the operation of the related system (validation and other similar activities), the certified expenses incurred in connection with these activities are also deductible (such as the purchase of mining equipment or electricity).

Hungary (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	If the private individual realized any loss in connection with a transaction executed in respect of crypto-assets during the tax year, the year preceding the current tax year, or in the two years preceding the current tax year, and if this loss is indicated in his tax return filed for the year when the loss was realized, the private individual shall be entitled to tax compensation that may be claimed as tax paid in the tax return. No taxation will arise if the amount of revenue arising on a crypto transaction does not exceed 10% of the minimum wage (HUF 29.080 in 2025), provided that in the tax year the sum total of these revenues does not exceed the minimum wage (HUF 290.800 in 2025).
5. What are the tax compliance/ reporting requirements?	The realized income and the tax liability should be reported to the Hungarian Tax Authority in the annual Hungarian tax return. The annual tax return is due by the 20th of May in the year following the tax year concerned (i.e., in which the income was realized). The income from crypto transactions shall be reported in Hungarian Forint. In case the income was realized in foreign currency, it shall be converted to HUF at the Hungarian National Bank's official exchange rate in effect on the date of earning the income. The tax liability of the individual must be paid in HUF as well.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not yet.
8. Are there/do you expect there to be any deviations from the OECD framework?	We do not expect deviations.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Hungary (3 of 5)

Direct Tax (3 of 3)

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Hungary (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	The Act CXXVII of 2007 – on Value Added Tax (hereinafter "**VAT Act**"), moreover any other indirect tax related act, guidance does not contain specific rules for cryptocurrencies.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Neither the VAT Act, nor any indirect tax related act, guidance contains a definition or any specific rule for NFTs.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Although the VAT Act does not provide specific guidance on NFT transactions, we believe that since NFTs – possibly - represent the digital ownership of an underlying asset that is not stored on the blockchain, this transaction should not be considered an exchange of payment assets. Therefore, we believe that the VAT treatment of an NFT sale is determined by the underlying asset. As a conclusion the sale of NFTs can be considered as a transaction subject to VAT or as a VAT exempt economic event (depending on the actual asset exchange, which do in fact is a result of the sale of NFTs) however it should be examined on a case-by-case basis.
5. Are there any other applicable exemptions relating to cryptoassets?	Neither the VAT Act nor any other indirect tax-related legislation or guidance provides a definition or specific rules for crypto assets.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Although marketplace is not defined in the VAT Act (the concept is only mentioned in the VAT Act), nevertheless according to the literature in relation to VAT marketplace generally means an electronic platform, which enhances the sale of goods. Furthermore, it is also a named and interpreted concept in the Hungarian VAT Act that services can be sold through a marketplace, nevertheless the concept of remote services sold through a platform or marketplace is not interpreted in the VAT Act.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	There are some specific rules, which are elaborated in the VAT Act in relation to goods sold through a platform or a marketplace with regards to the person, who shall assess and pay the VAT. Therefore, taking into consideration the assumption that the VAT treatment of a sale of an NFT is determined by the underlying asset, it is possible that special rules shall be applied. Nonetheless, these transactions shall be examined on a case-by-case basis.

Hungary (5 of 5)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	There is no specific rule or guidance in relation to tokenisation of a real-word asset. Nevertheless, we are of the view that the token, behind which an underlying asset can be identified which would also (or a part of it) be sold in the event that the crypto asset is sold, the transaction shall be treated the same way from VAT perspective as an economic event, with regards to which a crypto asset cannot be identified (only the real-world asset).
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No, there aren't any specific indirect tax related rules, official guidance for De-Fi. Even generally there is no legislation in relation to De-Fi or the concept of De-Fi.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	In Hungary, there are no specific rules or domestic consultations exclusively for crypto asset transaction reporting catered to indirect taxes.

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Iceland (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes, there is tax authority guidance but only concerning individuals, no guidance regarding companies has been issued. There are no specific laws solely dedicated to cryptocurrencies. Therefore, general tax laws apply to cryptocurrency transactions. This includes income tax and capital gains tax, which are applicable to income derived from cryptocurrency activities.
2. If "yes", what is the scope of taxability?	The scope of taxability for cryptocurrencies in Iceland for individuals includes: **Income Tax**: All forms of income, including those derived from cryptocurrency transactions, are subject to taxation. This includes income from mining, trading, and other activities involving cryptocurrencies. **Capital Gains Tax**: Profits from the sale of cryptocurrencies are considered capital gains and are taxable. The tax treatment depends on whether the gains are considered part of business income or personal investment income.
3. What are the direct tax implications?	**Income from Mining**: Income generated from mining cryptocurrencies is considered taxable income. The timing of income recognition can depend on the stability of the cryptocurrency's value. **Trading and Investment:** Gains from trading cryptocurrencies are subject to capital gains tax. The method of calculating the cost basis can follow the average cost method, similar to the treatment of securities. **Losses:** Losses from cryptocurrency transactions can be used to offset gains from similar transactions within the same tax year.
4. Are there any other relevant/noteworthy tax considerations?	**Classification of Cryptocurrencies:** Cryptocurrencies are not classified as legal tender but as digital assets. This classification affects their treatment under various tax laws. **Record-Keeping:** Taxpayers are required to maintain detailed records of all cryptocurrency transactions, including dates, amounts, and counterparties, to substantiate their tax filings.
5. What are the tax compliance/ reporting requirements?	**Annual Tax Returns**: Taxpayers must report cryptocurrency income and gains in their annual tax returns. **Detailed Reporting**: Specific details of each transaction, including the type of cryptocurrency, transaction date, amount, and value in local currency at the time of the transaction, must be reported.

Iceland (2 of 4)

Direct Tax (2 of 2)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes, the Icelandic tax authority has issued guidance on the reporting and taxation of cryptocurrency transactions.
7. If "yes", is there an indication on the implementation and reporting timeline?	The reporting requirements are already in effect regarding individuals, and taxpayers are expected to comply with them in their annual tax filings.
8. Are there/do you expect there to be any deviations from the OECD framework?	There are no significant deviations from the OECD framework expected. Iceland follows international standards for the taxation and reporting of digital assets.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Currently, there are no known deviations from the OECD framework in Iceland's approach to cryptocurrency taxation and reporting.

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Iceland (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes, there is a tax authority guidance for individuals but there are no specific legal provisions regarding the taxation of cryptocurrencies, such as Bitcoin and Ethereum, and therefore, general tax law provisions apply. The concept of income under the Income Tax Act is very broad and includes any kind of benefits that a taxpayer receives and can be valued in monetary terms, regardless of their source and form, unless they are specifically exempt from taxation.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The taxation of income from cryptocurrencies varies and depends on the circumstances in each case. Income may thus be taxed, among other things, as capital gains tax on sales profits, as salary income, or as business income. Tax liability may arise upon the receipt of cryptocurrency and upon its redemption.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs (Non-Fungible Tokens) are not specifically defined in the current Icelandic tax laws. However, their treatment would likely follow similar principles as other digital assets.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The treatment of NFTs sold in exchange for cryptocurrency would depend on the specific nature of the transaction. If considered a supply of goods or services, it may be subject to VAT unless specifically exempted.
5. Are there any other applicable exemptions relating to cryptoassets?	**Mining Activities:** Income from mining activities is not subject to VAT as it is not considered a supply of goods or services to another party.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	There is no specific definition of a marketplace for the purposes of VAT in relation to cryptocurrencies. General VAT principles would apply.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	If a marketplace is involved, the obligation to account for VAT would typically fall on the operator of the marketplace, depending on the specific arrangements and applicable laws.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	There is no specific guidance on the tokenisation of real-world assets under Icelandic VAT laws. The character or nature of the token would likely be assessed based on the underlying asset and the specific transaction.

Iceland (4 of 4)

Indirect Tax (2 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	There are no specific rules or guidance under Icelandic VAT laws. General principles of VAT would apply.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	There are no specific rules or consultations for crypto asset transaction reporting specifically for indirect taxes. General VAT reporting requirements would apply.

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India (1 of 7)

Direct Tax (1 of 5)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes.
2. If "yes", what is the scope of taxability?	In 2022 the Indian Income tax law introduced a specific tax framework for Virtual Digital Assets ('VDAs'). Specified Tax Framework announced under Income-tax law effective from 1 April 2022 covering taxation of VDA: • Taxing income from transfer and/or gift of VDA; and • With effect from 1 July 2022, withholding Tax (WHT) obligation on payment for transfer of VDA to an Indian resident subject to certain minimum thresholds. **Broadly VDA is defined to cover:** • any information or code or number or token (not being Indian currency or foreign currency); • generated through cryptographic means or otherwise, by whatever name called; • with the promise or representation of having inherent value, or functions as a store of value or a unit of account including its use in any financial transaction or investment, but not limited to investment scheme; • can be transferred, stored or traded electronically. [specifically includes Non-fungible Tokens (NFTs) and other digital assets as may be specified by the Central Government] In the Finance Budget 2025, the definition of VDA is proposed to be amended, w.e.f. 1 April 2026, to include any crypto asset being digital representation of value that relies on cryptographically secured distributed ledger or similar technology for validating and securing transactions.

India (2 of 7)

Direct Tax (2 of 5)

Question	Response
2. If "yes", what is the scope of taxability? (cont'd)	**Specific exclusion provided from definition/ scope of VDA as notified by the Apex Direct Tax administration body:** • Gift cards or vouchers for purchase/ discount on goods/ services; • Mileage points, reward points or loyalty cards given without direct monetary consideration under a specific program for purchase of or discount on goods or services; • Subscription to websites or platforms or application; • NFT whose transfer results in legally enforceable transfer of ownership of underlying tangible asset. Thus, the scope of the definition of VDA is very broad and may extend to cover items not otherwise specifically excluded.
3. What are the direct tax implications?	**A. Taxation of income from transfer/ gift of VDAs** – Capital Gains arising on transfer/ gift of VDA **taxable at 30% (plus applicable surcharge and education cess)** without any deduction except for cost of acquisition. – Netting the loss arising on sale of VDA is **not permitted** against any income; no carry forward of loss arising on sale of VDA. – Any loss arising from any other source cannot be set off against income from transfer of VDA. Further, the Finance Budget 2025 has proposed to classify VDA as undisclosed income under the Income Tax Act for e.g. if unreported gains from sale of VDA is identified during an income tax inquiry, tax authorities can levy tax at the rate of 60 percent along with additional penalties on same. **B. WHT provisions** Any person (which includes non-residents), who is responsible for paying to any India resident any sum by way of consideration for transfer of VDAs, shall deduct an amount equal to 1% of such sum as income tax. The tax deduction shall be made at the time of credit of such sum to the account of the India resident or at the time of payment, whichever is earlier if the consideration payable exceeds INR 10,000/ INR 50,000 (for specified person) during a financial year.

India (3 of 7)

Direct Tax (3 of 5)

Question	Response
3. What are the direct tax implications? (cont'd)	i. For transactions carried out on an exchange: **In the hands of exchanges/ brokers:** For transactions taking place on an exchange, tax may be withheld only by the exchange/ broker which is crediting or making payment to the seller (owner of the VDA being transferred). In case consideration is in kind or in exchange of another VDA or partly in kind and cash is not sufficient to meet the WHT liability, the exchange must ensure that tax is deducted on both transactions and paid, before releasing the consideration. Tax deduction mechanism has been prescribed when one VDA is exchanged for another VDA on the exchanges. ii. For transactions other than those taking place on or through an exchange: **In the hands of buyer/ recipient:** In a peer-to-peer transaction, the buyer (i.e., person paying the consideration) is required to withhold tax. In case consideration is in kind or in exchange of another VDA or partly in kind and cash is not sufficient to meet the WHT liability, the buyer must ensure that tax required to be deducted has been paid in respect of such consideration, before releasing the consideration.
4. Are there any other relevant/noteworthy tax considerations?	In effect from 1 April 2020, Equalisation Levy ('EL') at the rate of 2% applies on consideration received/receivable by any non-resident who owns/operates/manages a digital/electronic facility/platform from 'online' 'sale of goods' or 'provision of services', made or provided or facilitated to an Indian resident. However, this 2% EL was **abolished under the Finance Act 2024, with effect from August 1, 2024.** Therefore, if a crypto/NFT platform or exchange is considered a non-resident entity owning, operating, or managing a platform, and cryptocurrencies or NFTs are classified as goods or services, the applicability of the 2% EL on consideration from Indian residents must be evaluated for the period prior to August 2024.

India (4 of 7)

Direct Tax (4 of 5)

Question	Response
5. What are the tax compliance/ reporting requirements?	**In the hands of seller:** • Payment of quarterly advance tax, if applicable; • Filing annual Income-tax return. **In the hands of Buyer:** • Monthly payment/ deposit of WHT collected from India resident into Government treasury; • Quarterly filing of WHT returns. **In the hands of Exchange/ Broker:** • Monthly payment/ deposit of WHT collected from India resident into government treasury; • Quarterly filing of WHT statements; • Filing of annual income-tax return as applicable; • Quarterly EL payment & Annual EL return filing to foreign exchange or brokers if applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes. The Government of India in the Finance Budget 2025 has proposed new provisions which aim at enhancing the reporting obligations. Under these proposed provisions, reporting entities will need to submit statements on crypto transactions in a prescribed format and within a specified timeframe. The reporting entities would be given an opportunity to file statement upon receipt of notice from the Tax authorities or rectify mistakes in the statements filed. Central Government will prescribe rules for persons who are required to be registered along with detailed framework.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

India (5 of 7)

Direct Tax (5 of 5)

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India (6 of 7)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No – presently there are no specific provisions providing guidance on the indirect tax position for cryptocurrency. The Indian Government has requested a Committee to provide recommendations on the nature and taxability of cryptocurrency transactions under India GST. However, the recommendation is yet to be finalized, after which the Indian Government is expected to issue certain guidelines or policy. Meanwhile, the GST authorities are demanding GST on the fees charged by overseas cryptocurrency platform from its Indian customers.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no specific definition for NFT on a standalone basis. Virtual Digital Assets (VDA) is defined in the Income Tax law and the same definition is found in the GST law in India. A VDA is: a. any information or code or number or token (not being Indian currency or foreign currency), generated through cryptographic means or otherwise, by whatever name called, providing a digital representation of value exchanged with or without consideration, with the promise or representation of having inherent value, or functions as a store of value or a unit of account including its use in any financial transaction or investment, but not limited to investment scheme; and can be transferred, stored or traded electronically; b. a non-fungible token or any other token of similar nature, by whatever name called; c. any other digital asset, as the Central Government may, by notification in the Official Gazette specify. Presently there are no specific provisions providing guidance on the levy of GST on NFTs and clarity on taxability is expected after the recommendation is finalized by the Committee and discussed by the Government.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The tax treatment of NFTs and cryptocurrencies is still subject to clarification from the Government.
5. Are there any other applicable exemptions relating to cryptoassets?	No.

India (7 of 7)

Indirect Tax (2 of 2)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Related provisions of the Central Goods and Services Tax Act, 2017 are as follows: 2(44). "electronic commerce" means the supply of goods or services or both, including digital products over digital or electronic network; 2(45). "electronic commerce operator" means any person who owns, operates or manages digital or electronic facility or platform for electronic commerce;
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Generally, the seller is required to discharge the GST liability on supply of goods and services. However, for certain notified goods and services, the e-commerce operator is liable to collect and discharge the tax on the supplies undertaken through their platform. At present, the sale of NFT's is not notified under these specified goods and services. However, more clarity is expected after the recommendation is finalized by the Committee and discussed by the Government.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No specific guidance issued at this stage.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No specific guidance issued at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No specific guidance issued at this stage.

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Ireland (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Irish Revenue Guidance on Taxation of Crypto Asset Transactions, last updated June 2024 (https://www.revenue.ie/en/tax-professionals/tdm/income-tax-capital-gains-tax-corporation-tax/part-02/02-01-03.pdf)
2. If "yes", what is the scope of taxability?	Income and gains from crypto asset transactions are taxable under standard income tax, corporation tax, capital gains tax and capital acquisitions tax rules. VAT can also apply to certain transactions.
3. What are the direct tax implications?	There are no specific rules relating to cryptocurrency in Ireland. Each case must be considered based on its own facts and circumstances. While the sale of crypto assets would likely be a disposal for capital gains tax purposes, in certain cases the nature of the transactions may be viewed as a trade of dealing in crypto assets and taxed as income profit in the hands of holder of the taxpayer.
4. Are there any other relevant/noteworthy tax considerations?	No change since prior year aside from the introduction of DAC 8 rules into Irish tax legislation to take effect from 1 January 2026.
5. What are the tax compliance/ reporting requirements?	The reporting requirements under DAC8 are being introduced through the 2025 Finance Bill/Act process and are in line with the OECD (2023), International Standards for Automatic Exchange of Information in Tax Matters: Crypto-Asset Reporting Framework. The draft legislation provides for reporting on an aggregate basis for each transaction type.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No specific guidance has been issued for DAC 8 (CARF and CRS 2.0) yet, but it is expected that it will be issued in due course.

Ireland (2 of 4)

Direct Tax (2 of 2)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	Per the draft legislation, CARF will apply to reporting periods commencing on or after 1 January 2026. The CARF reporting deadline in Ireland is 31 May, with 31 May 2027 being the first reporting deadline in respect of the 2026 calendar year. Reporting Crypto-Asset Service Providers (RCASPs) must register with Irish Revenue by 31 December of the first year in which they become an RCASP and will have reporting obligations with respect to relevant Crypto-Assets.
8. Are there/do you expect there to be any deviations from the OECD framework?	No significant deviations per the draft legislation with the exception of the Due-Diligence provisions which provide for the following: • Where a Crypto-Asset User (other than an excluded person) fails to provide the relevant due diligence information within 60 days after the RCASP issues a second reminder, the RCASP must halt their transactions. • RCASPs must provide each Reportable User with a copy of the information submitted regarding that Reportable User.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	As above.

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Ireland (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes. The Revenue Commissioners in Ireland have issued guidance on the taxation of crypto asset transactions (including VAT). There is also case law from the Court of Justice of the European Union (CJEU) (Hedqvist, C-264/14) on the VAT treatment of cryptocurrency exchange.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	According to guidance issued by the Revenue Commissioners and in accordance with the Hedqvist judgment indicated above, the exchange of cryptocurrencies is exempt from VAT in accordance with the exemption contained in Paragraph 6(1)(d) of the VAT Consolidation Act, 2010 (issuing, transferring, receiving or otherwise dealing in currency). The Revenue Commissioners guidance also indicates that income received from cryptocurrency mining activities generally will be outside the scope of VAT on the basis that the activity does not constitute an economic activity for VAT purposes.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Barter transaction. The transfer of the cryptocurrency is exempt from VAT. The VAT treatment of the exchange of the NFTs is yet to be determined.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The legislation refers to electronically supplied services being supplied through a telecommunications network, an interface or a portal. These terms are not defined in any further detail.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	As discussed above, the VAT treatment of NFTs is yet to be determined.

Ireland (4 of 4)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not at this stage.

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Italy (1 of 7)

Direct Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	The Italian Financial Bill for 2023 (Law 29 December 2022, n. 197) introduced a specific tax regime applicable to cryptocurrencies held by natural persons (acting outside the ordinary course of business activity) and certain entities (e.g., non commercial entities). For companies, the Financial Bill for 2023 introduced tax rules concerning the evaluation of the cryptocurrencies held at the end of the FY. Further, on 27 October 2023 the Italian tax authorities issued circular letter n.30 explaining the tax rules recently introduced on cryptocurrencies.
2. If "yes", what is the scope of taxability?	The Financial Bill updated the "miscellaneous incomes" provision (applicable to Italian individuals, Italian non commercial entities and foreign investors) introducing a new category of incomes which comprise any "digital representation of values or rights that can be transferred or recorded electronically through DLT (Distributed Ledger Technology) or similar technology". This definition is similar to the one contained in MiCA regulation and includes, in principle, transactions relating to: • utility token; • staking; • crypto currencies; • NFT. The new regulation does not apply to investment token or security token, which are considered as financial instruments and thus they are subject to the tax rules applicable to the "underlying" instrument (e.g., security tokens representing bonds are subject to the tax treatment of bonds).
3. What are the direct tax implications?	**Company** In general, the exchange between different cryptocurrencies or exchange of cryptocurrencies with FIAT currency (such as Euro) as well as the sale of cryptocurrencies generates positive and negative item of income that are included in the taxable base of the company which is subject to ordinary taxation (i.e. corporate income tax and regional tax).

Italy (2 of 7)

Direct Tax (2 of 4)

Question	Response
3. What are the direct tax implications? (cont'd)	Based on the news introduced by the Financial Bill for 2023, with reference to cryptocurrencies held by the company at the end of each fiscal year, the difference between the purchase tax value and the market value at the end of the year is not subject to corporate income tax (IRES) and regional tax (IRAP), regardless how cryptocurrencies are accounted for and regardless the recognition of incomes/losses from the evaluation of said cryptocurrencies in the P&L **Natural person (acting outside the ordinary course of business activity)** Capital gains realized by a natural person and remuneration in cryptocurrencies received for staking are subject to final substitute tax equal to 26%. From 2026, Financial Bill 2025 has established that the taxation has to be levied at 33% (instead of 26%). Furthermore, from 2025 no threshold exemption exits (i.e. until 2024 capital gains on cryptocurrencies were taxable if above €2,000 and capital loss on cryptocurrencies were carry forwarded if above €2,000). In any case capital gains and losses on cryptocurrencies cannot be offset against capital gain and losses arsing from traditional financial instruments (shares, bonds etc.) Capital loss on cryptocurrencies are deductible from remuneration for staking.
4. Are there any other relevant/noteworthy tax considerations?	**Natural person** Individuals who transfer their residence to Italy, if certain conditions are met, may opt to be subject to substitute tax (calculated as a lump sum in the amount of Euro Euro 200,000 per year) on income generated abroad. Based on the clarifications contained in the Circular letter no. 30/2023, if cryptocurrencies are held abroad, they should be included in the scope of the substitute tax on foreign income
5. What are the tax compliance/ reporting requirements?	**Company** Italian and foreign cryptocurrency service providers must register in a special section of the register maintained by the Body for Agents and Brokers (OAM register: https://www.organismo-am.it/elenchi-registri/operatori_valute_virtuali/).

Italy (3 of 7)

Direct Tax (3 of 4)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	Foreign operators must also have a permanent establishment (if from the EU) or a company incorporated in Italy (if from outside the EU) and thus, based on the shared view of practitioners, will no longer be able to operate on a (solely) cross-border basis. Moreover, cryptocurrency service providers have reporting requirements to the OAM register on the identity and operations of Italian clients (ref. Decree of 13 January 2022). **Natural person** Capital gains on cryptocurrencies are taxable in the tax return, unless the individual taxpayer opts for the application of the so called "Risparmio amministrato" or "Risparmio gestito" tax regime with a suitable intermediary. In this case, said intermediary would apply the 26% substitute tax (33% from 2026), the individual investor is no longer required to include the income in its annual tax return. For cryptocurrencies held with Italian financial intermediaries (or Italian branches of foreign intermediaries), said intermediaries apply an annual 0,2% stamp duty tax on the value of the cryptocurrencies. Therefore, if the cryptocurrencies are held with an intermediary applying the "Risparmio amministrato" or "Risparmio gestito" regime, the investor has no personal tax compliance obligations other than the payment of the stamp duty. Conversely, if the cryptocurrencies are not held with an intermediary, the investor must personally take care of: (i) completing Section RW of the tax return; (ii) taxation of the related income; and (iii) payment of the IVAFE.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No
If yes: **7. Is there an indication on the implementation and reporting timeline?**	Not applicable
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Italy (4 of 7)

Direct Tax (4 of 4)

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Italy (5 of 7)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	With the publication of Circular No. 30/E/2023, concerning the tax treatment of crypto-assets (commenting on Article 1, c.c. 126 -147, Law No. 197/2022 – Finance Law 2023), the Italian tax authorities ("ITA") have provided some comments on the VAT treatment of crypto-assets (although it was not the focus of the document). The ITA have recalled that there is a lack of a specific VAT legislation at the domestic and EU level and the necessity, for the time being, to refer to international best practice and guidelines at the European level.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The ITA have borrowed from the EU guideline the classification and the related interpretation of: • payment token; • utility token; • security token. With the mentioned Circular letter, the Italian tax authorities have anyway provided more comprehensive guidelines compared to previous clarifications. A case-by-case analysis remains necessary whenever the actual cases and the characteristics of each case do not correspond to the categories of instruments already known and for which an assessment has already been made by the Italian tax authorities. In particular, a few VAT impacts related to the following phases of a crypto-asset's life, including related activities/services, were analyzed, without claiming to be exhaustive: • creation; • possession; • trade. The most consolidated position still relates to sale/purchase of Bitcoins (or other traditional cryptocurrencies when they can be considered as "means of payment") by companies carrying out exchange services between traditional currency against units of the virtual Bitcoin currency and vice versa (i.e., exchange margin VAT exempt).

Italy (6 of 7)

Indirect Tax (2 of 3)

Question	Response
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	The concept of NFTs has not been provided for in the Italian legislation. Yet, in the mentioned Circular letter, the ITA have recommended an evaluation of the contractual agreements associated with the NFT itself, understood as the rights, or more generally, the assets it incorporates, as well as the manner in which this instrument circulates.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The VAT treatment of NFTs and related activities is not predefined, as it is necessary to analyze what the parties are interested in and what the real function of the token is. Specifically, the parties of the transaction may be interested: • in the NFT only. In this case, the related services qualify as electronic services and will become relevant for VAT purposes at the time of payment of the consideration, according to the territoriality rules set forth in Article 7-octies, Presidential Decree No. 633/1972, with the application of the rate typical of generic services; • also in the underlying (e.g. goods, services or rights) that the NFT represents/incorporates. In this case, the NFT takes on the nature of a purely vehicle with respect to the transfer of the goods, services or rights incorporated in the underlying and thus acquires an ancillary nature. From a VAT point of view, it therefore means that the VAT treatment will tend to follow the rules applicable to the underlying asset.
5. Are there any other applicable exemptions relating to cryptoassets?	In the mentioned Circular letter, ITA confirmed that (i) an analysis on a case-by-case basis is recommended (ii) certain services (e.g. digital wallet custody and staking) might benefit from the VAT exemption.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No, there is no domestic definition of “marketplace” in Italian VAT Law. Indeed, the concept of “marketplace” (i.e. real or virtual space where buying and selling goods and services take place between a plurality of buyers and sellers) in the Italian legislation has been entirely borrowed from the VAT Directive and, consequently, domestic guidance follows entirely the EU guidelines.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Where transfer of NFTs fell within the definition of ESS (which has to be verified on a case by case basis), the marketplace could be seen as the supplier for VAT purposes where the conditions set out by article 9a, EU Regulation no. 282/2011 are met (please also refer to the “Explanatory notes on the EU VAT changes to the place of supply of telecommunications, broadcasting and electronic services”).

Italy (7 of 7)

Indirect Tax (3 of 3)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Although not exhaustive, some references can be found in Circular no. 30/2023 in the paragraph dedicated to the high-level comments re NFTs.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No published guidance at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Japan (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes - Income Tax Law and Corporation Tax Law prescribe the taxation of cryptocurrencies, and the National Tax Agency in Japan also provides Q&A regarding certain taxations of cryptocurrencies.
2. If "yes", what is the scope of taxability?	Income from sale, use and exchange of cryptocurrencies and acquisition of cryptocurrencies by mining are covered.
3. What are the direct tax implications?	For individuals, income from cryptocurrencies transactions is subject to income tax as miscellaneous income at the progressive rate. For corporations, income from cryptocurrencies transactions is subject to corporate tax. Also, cryptocurrencies are marked to market at the end the fiscal year if they have markets (*). (*) They have markets if all of the following requirements are met. i) The selling price is continuously published, and the selling price has an important influence on the determination of the sales price of the cryptocurrency. ii) Transactions are being conducted in sufficient quantity and frequency so that the selling price (i) above can be continuously published. However, cryptocurrencies that meet the following criteria are excluded from the scope of crypto assets held by corporations at the end of the fiscal year that must be recorded at their fair value: a) The cryptocurrencies issued by the corporation itself and continuously held since issuance • The transfer of the cryptocurrencies is restricted by one of the following methods on an ongoing basis since its issuance: i. Technical measures are taken to prevent the transfer of the cryptocurrencies to other persons. ii. The asset is entrusted and the trust holding the cryptocurrencies satisfies certain requirements. b) The cryptocurrencies issued by a third party • The transfer of the cryptocurrencies is restricted by a certain method on an ongoing basis since its issuance. • Procedures are in place to ensure that the above restrictions are appropriately disclosed.

Japan (2 of 4)

Direct Tax (2 of 2)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	Clear guidelines of “Japan source income” have not yet been provided regarding the cryptocurrencies transactions”, so certain taxations are not clear, such as taxations of non-permanent residents, non-Japan source income for foreign tax credits purposes, etc.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes - 2024 tax reform introduced that based on the OECD’s Crypto Asset Reporting Framework, a system will be established to require domestic crypto asset traders to report transactions in crypto assets of non-residents, so that Japanese tax authorities can respond to automatic exchange of information requests from treaty partners.
7. If “yes”, is there an indication on the implementation and reporting timeline?	The amended law will come into effect on January 1, 2026, and domestic crypto asset traders must identify the country of residence of their users by December 31, 2026. Thereafter, they must submit transaction information, etc., of the reportable users to the tax authorities by April 30 of the following year.
8. Are there/do you expect there to be any deviations from the OECD framework?	No
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Japan (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes - Consumption Tax Law were amended in 2017.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Consumption tax is levied when a business enterprise transfers goods, provides services, or imports goods into Japan. Consumption Tax Law prescribes that the consumption tax is not imposed on cryptocurrency transactions.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no Japanese consumption tax regulation that specifically stipulates NFTs and it is necessary to look into the nature of each NFT to clarify how the transaction is treated for Japanese consumption tax purposes. Under the Japanese Consumption Tax Law, transfer of copyrighted material and services provided via electronic and telecommunication networks (e.g., internet) such as the provision of e-books, music, and advertisements are regarded as "provision of electronic services". Unless the supply of NFTs is a transfer of copyrighted material, it would not be included in "provision of electronic services" but it is not certain.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not clear.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes - as described in 2. above, consumption tax is not imposed on cryptocurrency transactions.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not clear.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.

Japan (4 of 4)

Indirect Tax (2 of 2)

Question	Response
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Kenya (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No - The Finance Act 2023 introduced a provision on Digital Asset Tax ("DAT") in the Kenya Income Tax Act ("ITA"). This provision covers the taxation of income derived from the transfer or exchange of digital assets, effective 1 September 2023. However, effective 1 July 2025, the Finance Act 2025 repealed DAT from the ITA hence it is no longer applicable.
2. If "yes", what is the scope of taxability?	Not applicable as of 1 July 2025. However, the following was applicable up to 30 June 2025: **Key criteria definition of Digital Asset** (the scope)**:** The Kenyan ITA defines "Income derived from transfer or exchange of a digital asset" to mean the gross fair market value consideration received or receivable at the point of exchange or transfer of a digital asset. Further, a digital asset has been defined in the Kenyan ITA as; • anything of value that is not tangible and cryptocurrencies, token code, number held in digital form and generated through cryptographic means or otherwise, by whatever name called, providing a digital representation of value exchanged with or without consideration that can be transferred, stored or exchanged electronically; and • a non-fungible token or any other token of similar nature, by whatever name it is called. **Specific exclusion provided from definition/ scope of VDA**: • Not applicable.
3. What are the direct tax implications?	Not applicable as of 1 July 2025. However, prior to the repeal of DAT via the Finance Act 2025, the owner of a platform or the person who facilitates the exchange or transfer of a digital asset ("owner" or "facilitator") shall deduct the DAT at the rate of 3% of the gross fair market value consideration received or receivable at the point of exchange or transfer of a digital asset.
4. Are there any other relevant/noteworthy tax considerations?	There are attempts to tax the transfer or exchange of digital assets under the Significant Economic Presence Tax ("SEPT") regime as seen by the inclusion of transfer or exchange of digital assets as part of the in scope digital services in the draft SEPT regulations published in September 2025.

Kenya (2 of 4)

Direct Tax (2 of 2)

Question	Response
5. What are the tax compliance/ reporting requirements?	Not applicable as of 1 July 2025. However, up to 30 June 2025, the owner / facilitator was required to deduct and remit DAT to the Commissioner of the Kenya Revenue Authority ("KRA") within 5 working days after making the deduction. In addition, he/she was required to file a return detailing: • The amount of payment; • Amount of tax deducted; and • Any other information required by the Commissioner. However, kindly note that in practice, there is no DAT return as the revenue authority portal has not been configured to provide for a DAT return
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Kenya (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	**No** - Kenya does not have any statutory laws governing cryptocurrencies and neither has the Kenyan tax authority published any guidelines governing the applicability of VAT on cryptocurrencies. However, with effect from 1 July 2025, Kenya introduced excise duty on virtual assets. Please refer to details at Point 10.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No
4. Treatment of NFTs sold in exchange for cryptocurrency?	NFTs sold in exchange for cryptocurrency are subject to VAT in Kenya at a standard rate of 16%. Our view is premised on the broad definition of 'services' for VAT purposes and the fact the VAT Act, Cap. 476 ("the VAT Act") has not explicitly exempted NFTs from VAT. Furthermore, NFTs are not recognised as legal tender in Kenya, and it is our view the same cannot be construed as 'money' that is excluded from the scope of taxable supplies in Kenya. The VAT Act, provides that a supply of services for VAT purposes means "anything done that is not a supply of goods or money". The VAT Act further defines 'money' to mean inter alia "any coin or paper currency that is legal tender in Kenya".
5. Are there any other applicable exemptions relating to cryptoassets?	None.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, section 5 (9) of the VAT Act defines a digital marketplace to mean "an online platform which enables users to sell goods or provide services to other users"
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	In Kenya, the VAT (Electronic, Internet and Digital Marketplace Supply) Regulations, 2023 which target non-resident suppliers providing electronic services to Kenyan consumers, expanded the scope of taxable services to include the "facilitation of online payment for, exchange, or transfer of **digital assets**, excluding exempt services". While the VAT law does not define 'digital asset,' the Kenyan Income Tax Act (which can be relied upon on a persuasive basis) defines it as anything of value that is not tangible, including cryptocurrencies, token codes, and non-fungible tokens (NFTs).

Kenya (4 of 4)

Indirect Tax (2 of 2)

Question	Response
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs? (Cont'd)	As such, any fees earned by non-resident suppliers for facilitating payments, exchanges, or transfers of digital assets (including NFTs) in Kenya, are subject to VAT at the standard rate of 16%. These suppliers ought to register under the simplified VAT framework and account for VAT.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No, there is no specific VAT guidance on tokenisation of real-world assets.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	The Kenyan tax authority is yet to issue guidance issued with regards to Decentralized Finance ("De-Fi") at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	In addition to VAT and with effect from 1 July 2025, Kenya introduced excise duty on virtual assets. With effect from 1 July 2025, excise duty will be levied on fees charged on virtual assets transactions by virtual asset providers at 10% of the excisable value. Excisable value of excisable services shall be - (a) if the excisable services are supplied by a registered person in an arm's length transaction, the fee, commission, or charge payable for the services; or (b) in any other case, the open market value of the services. But shall not include the value added tax, if any, payable on the supply of the services. Virtual assets not defined under the Excise Duty Act.

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Korea (1 of 6)

Direct Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes
2. If "yes", what is the scope of taxability?	Under Article 2(1) of the Act on the Protection of Virtual Asset Users (the "Act") (as referenced by the Korean tax law), the term 'virtual assets' is broadly defined as electronic certificates of economic value which can be traded or transferred electronically (excluding certain types of assets prescribed under the Act). The scope and types of virtual assets are expected to be set forth in relevant regulations to be issued by the Ministry of Economy and Finance (MOEF) in the near future.
3. What are the direct tax implications?	**In the hands of seller:** • Korean resident company – subject to income tax at a progressive tax rate of up to 26.4% (including local income tax) on any income or gains from virtual assets (under the 2025 tax reform proposal, the marginal rate will increase to up to 27.5% for fiscal years beginning on or after January 1, 2026). • Korean resident individual – subject to individual income tax at a tax rate of 22% (including local income tax) on income from the transfer or lease of virtual assets, effective from January 1, 2027 (which is postponed by two years from January 1, 2025 under the tax law amendments ratified by the National Assembly in December 2024). • Non-resident individual & foreign corporation – subject to WHT on Korean source other income for income derived from the transfer or lease of virtual assets (including the withdrawal of the assets stored or managed by a virtual asset service provider as defined in the Act), effective from January 1, 2027 (which is postponed by two years from January 1, 2025 under the tax law amendments ratified by the National Assembly in December 2024). The domestic WHT is imposed at the lower of 10% of the proceeds received from the transfer, lease, or withdrawal of the assets or 20% of the gains from the transfer, etc. (excluding local income tax), which may be exempt under a relevant tax treaty. Note that for the period until the effective date of the amended tax law (January 1, 2027, which is postponed by two years from January 1, 2025 under the tax law amendments ratified by the National Assembly in December 2024), there has been uncertainty over the tax treatment on income earned from virtual assets by non-resident individuals or foreign corporations. Based on a recent court ruling issued in 2025, the income derived before the effective date of the amended tax law may not constitute Korean source other income and not be subject to Korean WHT.

Korea (2 of 6)

Direct Tax (2 of 4)

Question	Response
3. What are the direct tax implications? (cont'd)	**In the hands of a donee:** • Korean resident company – subject to income tax at a progressive tax rate of up to 26.4% (including local income tax) on the virtual assets received for free (under the 2025 tax reform proposal, the marginal rate will increase to up to 27.5% for fiscal years beginning on or after January 1, 2026) • Foreign corporation – subject to WHT at a domestic rate of 22% (including local income tax) on Korean source other income for the virtual assets received for free, which may be exempt under a relevant tax treaty
4. Are there any other relevant/noteworthy tax considerations?	**Valuation rules** provide for the valuation for virtual assets and the determination of a fair market value of virtual assets, including: • Valuation using the total-average method (expected) effective from January 1, 2027 for Korean resident companies, non-resident individuals and foreign corporations under the amended tax laws (For the period until December 31, 2026, under the former tax laws, using the FIFO method for Korean resident companies, and using the moving average method (for specific cases under the tax law) or the FIFO method (for other cases) for Korean resident individuals, non-resident individuals and foreign corporations). With respect to virtual assets held before January 1, 2027, the acquisition cost is determined as the greater of the market price as of 31 December 2026 calculated under the tax law or the acquisition price of the virtual asset, effective from January 1, 2027 (which is postponed by two years from January 1, 2025 under the tax law amendments ratified by the National Assembly in December 2024). Please note that in the case of a gift transaction, the virtual assets should be evaluated under the method prescribed in the Inheritance and Gift Tax Law ("IGTL"): • For virtual assets that are listed in one of the four designated exchanges in Korea (i.e., UPbit, Bithumb, Korbit, Coinone): FMV would be the average of daily average trade prices during the period between one month before and one month after the valuation date • For virtual assets not listed on the above exchanges: Other reasonable methods (i.e., average trade price as at the valuation date or the market price as at the closing date in the exchanges other than the aforementioned designated exchanges) should be used to evaluate the virtual assets.

Korea (3 of 6)

Direct Tax (3 of 4)

Question	Response
5. What are the tax compliance/ reporting requirements?	The tax compliance/reporting requirements for virtual assets include the following: **In the hands of Virtual Asset Service Provider:** • Certain qualified virtual asset service providers under the Act should submit a quarterly statement of transactions for corporations conducting the transfer or lease of virtual assets by the end of two months from the end of the quarter in which the transactions take place, effective from 1 January 2023. • The qualified virtual asset service provider under the Act also will be required to file an annual statement of virtual asset transaction by the end of the two months from the end of the fiscal year, effective from 1 January 2024. **In the hands of seller:** • A Korean resident company should report any income from virtual assets in its annual corporate income tax return to be filed with the tax authority within three months from the end of a month in which a fiscal year end falls. • A Korean resident individual should report any income from the transfer or lease of virtual assets in their annual income tax return to be filed with the tax authority by May 31 of the following year. • For a non-resident individual or foreign corporation, a withholding agent (e.g. the payer of the Korean source other income or a virtual asset service provider as defined in the Act for the assets stored or managed by itself) should withhold WHT at the time of payment or at the time of the withdrawal of the assets stored or managed by a virtual asset service provider, and it should file the monthly withholding compliance return with the tax authority by the 10th day of the following month. Also, an annual payment statement for income from the transfer or lease of virtual assets should be submitted to the tax authority by the end of February of the following year.

Korea (4 of 6)

Direct Tax (4 of 4)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No. According to the press release from Ministry of Economy and Finance (MOEF) issued on November 27, 2024, at the 17th OECD Global Forum held in Paraguay (November 26-28), a delegation from the MOEF officially signed the Multilateral Competent Authority Agreement on the Automatic Exchange of Information on Crypto-Assets Reporting Framework (CARF MCAA) on behalf of Korea. The MOEF noted that the actual exchange of information among countries would begin after individual agreements are established among the signatory countries. To establish the legal basis for the implementation of CARF, Korea has also amended relevant provisions of domestic tax law – specifically, the Law for the Coordination of International Taxation Affairs (LCITA) and its Presidential Decree - which were enacted in December 2024 and February 2025, respectively, and will take effect on January 1, 2026. Furthermore, on October 28, 2025, the MOEF announced that it would issue the draft "Regulation on the Implementation of the CARF-MCAA, which has been prepared as a follow-up measure reflecting the outcomes of OECD/G20 discussion aimed at strengthening international tax transparency, in order to expand and reinforce the exchange of relevant tax information between countries. The MOEF plans to complete the promulgation of the regulation within 2025, with the aim of initiating the mutual exchange of crypto-asset transaction information starting from 2027.
7. If "yes", is there an indication on the implementation and reporting timeline?	Implementation is expected to begin in 2027 for transactions made in 2026, with a reporting deadline at the end of April of the following year of the transactions.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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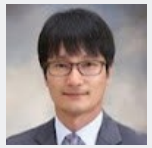

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Korea (5 of 6)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No clear provision under Korean tax law (VATL). However, the Ministry of Economy and Finance (MOEF) issued a tax ruling, providing that a supply of virtual assets is not regarded as a VAT-leviable supply of goods (MOEF VAT Department-145, 2021.03.02). The Basic Ruling 4-0-3 of the VATL (amended on March 15, 2024) also states that virtual assets are not subject to VAT.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No clear provision for NFT under the VATL.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Uncertain given the lack of the clear provision for NFT under the VATL. The MOEF issued a tax ruling, providing that whether the supply of NFTs(Non-Fungible Tokens) is subject to or exempt from VAT should be determined considering the type and characteristics of the NFT, the nature of underlying assets, the use of the NFT, and the form of the transaction, etc. (MOEF VAT Department-385, 2024.06.14).
5. Are there any other applicable exemptions relating to cryptoassets?	None given the lack of the clear provision relating to crypto assets under the VATL.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No clear provision under the VATL.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Uncertain given the lack of the clear provision for NFT under the VATL.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset	No clear provision under the VATL.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No clear provision for De-Fi VAT under the VATL.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No clear provision under the VATL.

Korea (6 of 6)

Indirect Tax (2 of 2)

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Kosovo (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Kosovo does not have specific tax authority guidance or direct tax law addressing cryptocurrency. However, general tax principles might apply. According to domestic legislation incomes from cryptocurrencies falls under general definition lawful and non-lawful income. Furthermore, as of September 22, 2024, a Law No. 08/L-295 on Crypto-Assets has been officially published in Kosovo. This law regulates licensing, supervision, and consumer protection in the crypto-asset sector and aligns partially with the EU's Markets in Crypto-Assets (MiCA) regulation.
2. If "yes", what is the scope of taxability?	Income from cryptocurrency trading, mining, or investment could be taxable under the Law of Personal Income Tax, Corporate Income Tax depending on status of the person (whether natural or legal).
3. What are the direct tax implications?	When crypto is sold for fiat currency or exchanged for other assets. Individuals and businesses must pay **10% tax** on profits earned from the sale or exchange of crypto-assets. If crypto is earned as income (e.g., through mining, staking, or as payment for services), it is treated as **regular income** and taxed accordingly. Businesses must include crypto-related income in their profit and loss statements. Companies dealing in crypto (e.g., exchanges, custodians) are subject to corporate income tax on their net profits. So, companies need to pay corporate income tax on that profit currently **10%** in Kosovo.
4. Are there any other relevant/noteworthy tax considerations?	Kosovo does not offer specific tax exemptions for crypto income. Standard personal income tax (PIT) and corporate income tax (CIT) rates apply: • PIT: up to 10% • CIT: 10% on net profits
5. What are the tax compliance/ reporting requirements?	Individuals earning income from cryptocurrency must report their annual tax declaration to TAK. This includes: • Capital gains from selling or exchanging crypto-assets • Income from mining, staking, or receiving crypto as payment • Business income from crypto-related services.

Kosovo (2 of 5)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements?	Annual tax declarations are typically due by March 31st of the following year. Taxpayers must maintain comprehensive records of crypto transactions, including: • Acquisition date and method (purchase, mining, gift, etc.) • Purchase price and sale price • Type of crypto asset • Transaction dates and counterparties
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	On February 28, 2025 TAK published a formal notice reminding all individuals and legal entities that: • Income generated from cryptocurrencies is taxable. • Taxpayers must declare and pay taxes in a timely and accurate manner. • Crypto income must be reported according to the taxpayer's legal status: Individuals: Apply Law No. 05/L-028 on Personal Income Tax, Legal entities: Apply Law No. 06/L-105 on Corporate Income Tax. Whereas Central Bank of Kosovo (CBK) came out with the first regulatory framework for Crypto-Assets in Kosovo: The first step towards gradual regulation and transparency. This regulation sets out requirements for licensing crypto exchanges and service providers, including capital, governance, and AML/CTF obligations.
7. If "yes", is there an indication on the implementation and reporting timeline?	Answer Above
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Kosovo (3 of 5)

Direct Tax (3 of 3)

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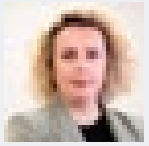

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Kosovo (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No - The Tax Administration of Kosovo refers to Law on VAT (Law No. 05/L-037). Crypto transactions fall under this law when used in exchange for goods or services.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No – in the VAT Law there is no definition for NFTs.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Based on the VAT Law, the general nature of transaction might fall under the definition of non-cash consideration, which includes barter transaction and could be considered as subject to VAT.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No. However, the VAT law has general rules for electronically supplied services in line with the EU 6th Directive on VAT.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	There is no specific definition related to marketplace therefore, the concept of accounting for VAT as this stage is unknown. However, it is necessary to consider the general definition of taxable person in VAT Law and determine accordingly.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No. However, the VAT law has general rules for electronically supplied services in line with the EU 6th Directive on VAT.

Kosovo (5 of 5)

Indirect Tax (2 of 2)

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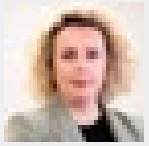

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Latvia (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There are SRS published materials on cryptocurrency activities and relevant tax aspects available. Cryptocurrency assets are considered part of capital assets and are subject to Personal income tax act (PIT Act) provisions and Corporate income tax act (CIT Act) provisions.
2. If "yes", what is the scope of taxability?	Income arising from cryptocurrency transaction is considered income from capital gain as per the PIT Act. Capital gain is determined by subtracting the acquisition value and the investment value of the capital asset during the holding of the capital asset from the disposal price of the capital asset. Losses arising from the sale of capital assets can be used to reduce taxable base in the same taxation year for PIT purposes. However, for cryptocurrency assets only losses arising on the sale of this specific type of assets can be used. Please note that all reported figures must be supported by respective documentation. From CIT perspective income from the sale of cryptocurrency assets would be considered general income subject to CIT at the moment of profit distribution. Please note that Latvia has a CIT system based on distribution.
3. What are the direct tax implications?	From 2025, capital gains income is subject to PIT at 25,5% rate. Capital gains income that exceeds EUR 200,000 threshold will attract additional PIT at 3% rate. From CIT perspective tax at the effective 25% rate would apply (if profit is distributed as dividends).
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	For PIT Income gained from the sale of cryptocurrency shall be declared via submission of quarterly and/or annual DK tax return (in Latvian - "Pārskata perioda deklarācija par ienākumu no kapitāla pieauguma") under the income code "V - income from a transaction with virtual currency". If the total capital gains income per quarter exceeds EUR 1000, the quarterly tax return should be submitted to the SRS by the 15th of the following month and the calculated tax should be paid by the 23rd date of the respective month. If the total income does not exceed EUR 1000, the annual tax return should be submitted by January 15 of the following year and the calculated tax should be paid by January 23. No specific reporting is required from a CIT perspective. Any dividends distributed in the particular month should be reported in CIT return by the 20th date of the next month and tax paid thereafter by 23rd.

Latvia (2 of 5)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	Latvia has introduced the Law on Crypto-asset Services. On June 27, 2014, an agreement between the Government of the Republic of Latvia and the Government of the United States of America was concluded to improve international tax compliance and to implement the Foreign Account Tax Compliance Act (FATCA) (hereinafter referred to as the FATCA Agreement). Latvian financial institutions that meet the definition of a financial institution as specified in the FATCA Agreement must provide data to the State Revenue Service (hereinafter referred to as SRS) on financial accounts of United States (hereinafter referred to as US) residents in the form of FATCA XML reports by July 31st of each year following the reporting period (Clause 5 of the Cabinet of Ministers Regulations No. 134 of March 24, 2015, "Procedure by which information is provided to the State Revenue Service for the fulfillment of requirements stipulated in the law 'On the Government of the Republic of Latvia and the Government of the United States of America Agreement to Improve International Tax Compliance and to Implement Foreign Account Tax Compliance Act (FATCA)'"). CRS requirements are applied in all EU member states, and they have concluded an agreement on the automatic exchange of financial information (DAC II Directive). On October 29, 2014, OECD approved the CRS. It grants tax administrations of participating countries the right to receive information from financial institutions about financial accounts of taxpayers from other participating countries and to send this information to the tax administration of the taxpayer's country of residence. Latvia has joined the CRS and implements it based on the Law "On Taxes and Fees".
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Draft law and draft Cabinet of Ministers regulations are published to implement EU DAC 8 Directive.
7. If "yes", is there an indication on the implementation and reporting timeline?	1 January 2026
8. Are there/do you expect there to be any deviations from the OECD framework?	Implementation is done based on DAC 8 Directive.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Implementation is done based on DAC 8 Directive.

Latvia (3 of 5)

Direct Tax (3 of 3)

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Latvia (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There are only Tax authority guidelines.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The purchase and sale of virtual currencies is a transaction that is VAT exempt. However, in accordance with Tax authority guidelines the standard VAT rate of 21% is applicable to services that have a place of supply in Latvia and are related to transactions with virtual currencies. The standard VAT rate of 21% also applies to intermediary services related to virtual currency exchange or sale services. Mining of virtual currencies is not entitled to deduct input tax.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFT are not defined. Since NFTs are blockchain-based tokens that each represent a unique asset, the application of VAT will depend on the specific asset. For example, if an NFT certifies ownership of digital content, its transfer will be subject to a 21% VAT if the transaction location is Latvia.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The application of VAT to NFTs does not change based on the method of payment.
5. Are there any other applicable exemptions relating to cryptoassets?	No
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The VAT Act does not provide a direct definition. It is possible that the term used in Article 3 of the Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC would be used.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	It could be the marketplace. There are no clear guidelines. The assessment could be influenced by the business model, status of the service recipient and provider.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidelines. We believe that the token would have the same nature as the underlying real-world asset.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Latvia (5 of 5)

Indirect Tax (2 of 2)

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Liechtenstein (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Liechtenstein does not have any specific laws in place regarding the taxation of digital assets or participants in the digital economy and electronic commerce. The tax treatment of income from such activities can be derived from existing tax rules supplemented by guidance in relation to the tax return filing (namely guidance for legal persons and individuals on the tax return). For those taxes of Switzerland that are also applicable in Liechtenstein, such as stamp duty and value added tax, the crypto tax guidelines as published by the Swiss Federal Tax Administration are applicable.
2. If "yes", what is the scope of taxability?	Generally, to be considered are direct taxes (such as corporate/individual income taxes and wealth tax), stamp duty and value added tax.
3. What are the direct tax implications?	**Corporate Tax** Corporations (including Foundations and Associations) are generally taxed on their worldwide income at a rate of 12.5% (flat-rate tax). Income attributable to foreign permanent establishments as well as dividends and capital gains generally are tax exempt (anti-abuse rules apply to participation income). With some exceptions, taxable profit generally corresponds to the accounting profit before tax. Liechtenstein does not levy withholding tax on dividends, interest or royalties. Corporations however may be subject to stamp taxes (issuance stamp duty and transfer stamp tax). **Individual Tax** Individuals generally are taxed based on their worldwide income and wealth. Taxable income consists of all types of employment and pension income while investment income (e.g. dividends, interest, capital gains or rental income) is taxed on a lump-sum basis, i.e. covered by a so-called standardized return on net assets included in the taxable income.
4. Are there any other relevant/noteworthy tax considerations?	**Stamp Duty** Liechtenstein and Switzerland share the same stamp duty regime, which is enforced by the Swiss Federal Tax Administration.

Liechtenstein (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations? (cont'd)	Generally, native token, utility token, and asset token without participation rights (as defined by the Swiss Federal Tax Authorities) do not qualify as taxable securities for transfer stamp tax purposes. However, debt token and asset-backed token with participation rights or whose underlying is a taxable security (such as a share, bond etc.) qualify as taxable securities and are therefore subject to transfer stamp tax at 0.15% (Swiss/Liechtenstein securities) or 0.3% (foreign securities), provided that a Swiss/Liechtenstein securities dealer is involved in the transaction. Issuance stamp duty is generally not due if tokens are issued, except the token would contain participation rights in the company issuing the token.
5. What are the tax compliance/ reporting requirements?	The general Liechtenstein tax filing requirements are applicable. Companies domiciled in Liechtenstein have to file an annual corporate tax return. Additionally, a company may have to file stamp duty declarations, value added tax declarations etc. Individuals tax resident in Liechtenstein have to file an annual income tax return.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	In November 2024, Liechtenstein signed the Multilateral Agreement to automatically exchange tax relevant information under the Crypto-Asset Reporting Framework (MCAA CARF). Based on this, Liechtenstein will establish the national legal basis for CARF in the course of 2025.
7. If "yes", is there an indication on the implementation and reporting timeline?	The government of Liechtenstein released its statement on the implementation of the CARF Act on 7 December 2025, following parliamentary discussions held on 5 September 2025. The second round of parliamentary discussions is scheduled for November 2025. CARF is expected to enter into force on 1 January 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	No significant deviations from the OECD framework are expected.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Liechtenstein (3 of 5)

Direct Tax (3 of 3)

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Liechtenstein (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	In Liechtenstein, the Swiss VAT law and practice is applicable due to the Swiss – Liechtenstein custom union. The cryptocurrency guidance is published by the Swiss Federal Tax authorities (VAT Info 4 applies).
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	It depends on the qualification of the token between: 1. Payment token (PT); 2. Utility token (UT); 3. Security (asset backed) token (ST) Hybrid token might embed functions from the above categories. Moreover, the VAT treatment also depends on the supply related to the crypto itself. For example: · • Sale and acquisition of token : - **PT:** Not relevant from a VAT perspective - **UT:** Taxable at the place of recipient - **ST:** Exempt without credit • Trading fees: - **PT:** Exempt without credit - **UT:** Taxable at the place of recipient - **ST:** Exempt without credit Please note that the SFTA is reviewing and remodeling its practice at the moment (December 2024). Changes are to be expected.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No definition. It is not defined as to whether NFT will be treated as ESS.
4. Treatment of NFTs sold in exchange for cryptocurrency?	If sold against PT: it will be considered as a taxable transaction. If sold against UT or ST: it will be considered as a barter transaction. The VAT implication on the cryptocurrency leg (as payment) will have to be analysed in each specific case.

Liechtenstein (5 of 5)

Indirect Tax (2 of 2)

Question	Response
5. Are there any other applicable exemptions relating to cryptoassets?	Yes, but it depends on the qualification of the crypto and the services. For example trading fees related to payment tokens are exempt without credit.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, but this is not a specific definition for NFT's or crypto's marketplace.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not clear, but assuming that the marketplace appears as the provider vis-à-vis the third party (buyer), the marketplace likely may have to account for VAT. As from 1.1.2025, the marketplace might also have some obligations to provide information to the SFTA (pure reporting information) on the Swiss related supplies.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No other rule than potentially the rules applicable for security (asset backed) token.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No, however in practice we observe consistent approach and tendency on how to treat De-Fi activities.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes	No

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Lithuania (1 of 7)

Direct Tax (1 of 5)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	While there is no specific income tax law regarding cryptocurrency, Lithuanian tax authorities have released limited guidance on the taxation of cryptocurrencies, which covers at a high level the direct and indirect tax implications (https://www.vmi.lt/evmi/documents/20142/391185/Paai%C5%A1kinimas+d%C4%97l+virtuali%C5%B3++RM-21969.pdf/30a8e9a1-132d-5f91-314c-64ff290f8d8b?t=1545390441331; https://www.vmi.lt/evmi/documents/20142/391071/Virtualios+valiutos+GPM.PDF/954957f9-18f5-1ec9-8c77-fa79d956c6d8?t=1664350832765 https://www.vmi.lt/evmi/documents/20142/391200/Virtualios+valiutos++apmokestinimas++pelno+mokes%C4%8Diu/18d516ab-3a1b-3c21-260d-201e9cc1a64d?t=1664351971890)
2. If "yes", what is the scope of taxability?	The scope of the guidance provided is income generated through **cryptocurrency:** • sale of cryptocurrency into regular currency or another cryptocurrency; • exchange of cryptocurrency into regular currency; • payment for assets, goods, or services in cryptocurrency; • Incentives to employees in cryptocurrency. The scope of the guidance provided is income generated through **tokens:** • Tax Obligations of the Token Distributor: - the distributor of tokens intended for the purchase of goods or services recognizes income when the goods or services are sold at the fair market price or the token expires; - funds received for distributed tokens considered as securities (or their part) are included in taxable income, if the token distributor does not assume any obligations or the amount of obligations is less than the amount of collected funds; - when tokens are issued during the initial coin offering (ICO), which are not considered as securities or prepayment for services, but only confirm the fact of payment of funds, without giving their owners any additional rights, then the funds collected for such distributed tokens are recognized as income of the unit that issued them. Income from such assets is recognized by the entity when the tokens are transferred to the ownership of other persons.

Lithuania (2 of 7)

Direct Tax (2 of 5)

Question	Response
2. If "yes", what is the scope of taxability? (cont'd)	• Tax obligations of the investor: - the taxable income of investors who have purchased virtual tokens considered as securities includes earned interest and income from the transfer of such virtual tokens; - the taxable income from sold, exchanged, or otherwise transferred tokens; - at the time of unlocking, the tokens entitle you to receive dividends, other assets etc. Tax regime applies to both individuals and legal entities
3. What are the direct tax implications?	**Tax regime - Corporate entities:** • in relation to Corporate income tax (CIT) taxable profit from cryptocurrency exchange or sales, tokens sales, exchange or otherwise transfer are taxed at the standard CIT rate (16%, if not eligible for exemptions); • dividends and interest earned from the tokens are taxed at the standard CIT rate (16%, if not eligible for exemptions). Taxable profit is calculated: the selling price minus the price of its production (purchase) in euros. **Tax regime - Individuals:** • According to Personal Income Tax (PIT) Law, cryptocurrency and tokens are considered as an asset, and the sale of this virtual currency is taxed as an income from the sale of another asset. In this case, the difference in euros between the sale price and the purchase price is taxable at 15% PIT (20% if exceeds 120 average national wages per year (2025 m. EUR 253,065.6)); • there is an exemption limit in the amount EUR 2,500 per calendar year, which is not subject to income tax; • also, the individual earned interest and income from the transfer of tokens considered as securities is taxable at 15% PIT (exemption limit in the amount EUR 500 per calendar year); • cryptocurrency produced by a resident is not considered as income received by a resident.

Lithuania (3 of 7)

Direct Tax (3 of 5)

Question	Response
3. What are the direct tax implications? (cont'd)	**Tax regime - Individuals, who carry out individual activities:** • Resident's income from cryptocurrency and tokens can be taxed as income from individual activities (if resident acting in continuous period and meets the criteria set for individual activities (continuity, independence, pursuit of economic benefits, etc.); • when calculating the taxable income of an individual activity, the allowed deductions (currency production or purchase costs, tokens costs, commission fees and etc.) specified in PIT Law may be deducted from the income (in EUR). • taxable profit from individual cryptocurrency, tokens buying and selling activities is taxed at a 15% income tax rate; • social security insurance (SSI rate is from 12.52% to 15.52% depending on whether the person accumulates an additional pension) and Compulsory health insurance (CHI rate 6. 98%) contributions should be paid on 90% of taxable income (gross of SSI and CHI contributions). **Non-resident individuals**, who carry out individual activities in Lithuania through a permanent base, pay income taxes in Lithuania like resident individuals, who carry out individual activities. If no permanence in Lithuania, then the income received by him in Lithuania from cryptocurrency, tokens - non-object of PIT. If a Lithuanian entity controls a foreign entity with preferential taxation that produces virtual currencies, trades them or carries out the distribution of virtual tokens, then it must assign positive income to taxable income in Lithuania (there are additional conditions and clauses). **Incentives in virtual currency:** Incentives transferred in virtual currency to an employee with the right of ownership must be considered as if the resident received income in kind. Such received income is classified as income related to employment relations, from which the employer is obliged to calculate, pay, and declare income tax (PIT, SSI, CHI).
4. Are there any other relevant/noteworthy tax considerations?	• In Lithuania, cryptocurrency and tokens should be accounted for in the balance sheets according to business accounting standards (BAS); • Cryptocurrency assets should be treated as financial assets, so companies can measure them at fair value at the end of each year if they have this ability;

Lithuania (4 of 7)

Direct Tax (4 of 5)

Question	Response
4. Are there any other relevant/noteworthy tax considerations? (cont'd)	• A unit (investor) that has purchased tokens that are not considered securities or advance payments (advances) should be treated as financial assets too. The cost of the purchased asset is the cost actually incurred to acquire the tokens; • When taxes and activities are related to virtual currencies and tokens, it should be noted that in Lithuania accounting procedures and accounting documents are drawn up using euros, therefore, all operations performed with virtual currency must be registered in euros. • The legal acts do not regulate the relationship between virtual currency (or tokens) and euro exchange. In his accounting policy, a person himself should determine the source of the exchange rate and the moment in time at which the recorded rate will be used for accounting and tax obligations. • All business transactions related to cryptocurrency and tokens income and expenses should be documented with all necessary mandatory details.
5. What are the tax compliance/ reporting requirements?	There is currently no special tax compliance or reporting requirements associated with cryptocurrency and tokens. Normal tax reporting and compliance rules apply: • Corporate entities should submit annual CIT return (PLN204) and pay CIT by June 15 of next year (differs if the company pays advance CIT); • Individuals and individuals, who carry out individual activities, should submit annual PIT return (GPM311) and pay PIT by May 1 of next year; • Individuals, who carry out individual activities, should also pay SSI, and CHI by May 1 of next year too.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The Ministry of Finance of the Republic of Lithuania has prepared an amendment to the Law on Tax Administration of the Republic of Lithuania, which provides for the transposition of the provisions of Council Directive (EU) 2023/2226 of 17 October 2023 amending Directive 2011/16/EU on administrative cooperation in the field of taxation (DAC8). Currently, the draft legislation is in the interinstitutional coordination process. This initiative aims to establish reporting requirements for crypto-asset service providers, aligning Lithuania's tax framework with EU standards to enhance transparency and combat tax evasion.

Lithuania (5 of 7)

Direct Tax (5 of 5)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent? (cont'd)	The draft legislation is currently undergoing interinstitutional coordination. In addition to incorporating DAC8 provisions, the proposal includes changes to advance pricing agreements (APAs), allowing for the retroactive application of tax laws for bilateral APAs in line with BEPS Action 14 recommendations. The Ministry has also suggested amendments to the Code of Administrative Offences, introducing fines ranging from €200 to €6,000 for non-compliance with information submission requirements to tax authorities, with stricter penalties for repeated violations. These measures are scheduled to take effect on January 1, 2025. For more detailed information, please refer to the official document: e-seimas.lrs.lt

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Lithuania (6 of 7)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	The Lithuanian Tax Authorities have issued guidance on the taxation of cryptocurrencies which covers certain direct and indirect tax implications (currently only in Lithuanian, https://www.vmi.lt/evmi/documents/20142/391185/Paai%C5%A1kinimas+d%C4%97l+virtuali%C5%B3++RM-21969.pdf/30a8e9a1-132d-5f91-314c-64ff290f8d8b?t=1545390441331).
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The position of the Lithuanian Tax Authorities generally align with the Court of Justice of the European Union case-law (decision in case C-264/14, Hedqvist). Cryptocurrencies used as means of payment are treated in the same manner as traditional currencies (i.e. the transactions on cryptocurrencies (e.g. exchange to other crypto or traditional currency) shall be exempt from VAT as financial services).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no public guidance on NFT's, however, we assume that the VAT treatment on electronically supplied services should be taken into account from VAT perspective.
4. Treatment of NFTs sold in exchange for cryptocurrency?	There are no public explanations in this respect. However, we assume that sale of NFTs should be subject to VAT as electronically supplied services. The mere fact that the sale of NFTs is remunerated by cryptocurrencies should not impact the VAT treatment of the sale itself.
5. Are there any other applicable exemptions relating to cryptoassets?	No specific exemptions other than exemption that could be applied in case a specific transaction falls into the scope of VAT exemption applicable for financial services (e.g. sale / exchange of a cryptocurrency used as a means of payment).
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The concept of a marketplace is understood broadly and may cover any electronic interface through which the electronically supplied services are provided. In principle, the provisions of Article 9a of the EU Regulation 282/2011 should be taken into account.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	The applicability of a "deemed supplier" provision of Article 9a of the EU Regulation 282/2011 should be assessed on each particular case involving the supply of digital products via the marketplace. Thus, we assume that the marketplace's liability for VAT on the sale of NFTs may not be excluded. However, no public explanation on this matter.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	There is no guidance on this matter.

Lithuania (7 of 7)

Indirect Tax (2 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	There are no specific rules or guidance for NFTs VAT treatment. The explanation provided by the Tax Authorities covers only cryptocurrencies and ICO (initial coin offering).
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Luxembourg (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – the Luxembourg direct tax authorities issued an Administrative Circular dated 26 July 2018 that is specific to virtual currencies, and which made certain key clarifications in respect of the tax treatment of virtual currencies, including: • Virtual currencies are not considered to be currencies but rather intangible assets for Luxembourg direct tax purposes; • Payments made in virtual currencies do not affect the tax treatment of the underlying transactions in Luxembourg.
2. If "yes", what is the scope of taxability?	In the Administrative Circular dated 26 July 2018, Luxembourg income tax authorities clarified the direct tax treatment of the mining and transfer of virtual currencies in Luxembourg.
3. What are the direct tax implications?	Virtual currencies and digital assets are subject to general tax rules applicable in Luxembourg. Income and capital gains derived by individual taxpayers from the disposal of virtual currencies are subject to Luxembourg progressive income tax rates (0% to 45.78%, including the solidarity tax. If virtual currencies are disposed of by an individual taxpayer more than six months following their acquisition, capital gains are not taxed in Luxembourg. Income and capital gains derived by corporate taxpayers from the disposal of virtual currencies are subject to Luxembourg corporate income tax and municipal business tax rates (up to 23.87%, including the solidarity tax, for FY25 and for Luxembourg-City), unless an exemption applies.
4. Are there any other relevant/noteworthy tax considerations?	Luxembourg Alternative Investment Funds ("**AIFs**") holding digital assets (including but not limited to cryptocurrencies) generally are not subject to income tax in Luxembourg and therefore, offer new options for both (i) digital asset managers looking for an on-shore, stable and transparent jurisdiction from which offering cross-border tax neutral digital assets-exposed investment fund products to third-party investors and for (ii) family offices and high-net worth individuals looking for an on-shore, stable and transparent jurisdiction from which managing their digital wealth.

Luxembourg (2 of 5)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements?	Virtual currencies and digital assets generally are subject to general tax reporting rules applicable in Luxembourg. Individual and corporate taxpayers generally are required to report their taxes based on a self-assessment mechanism through the filing of annual tax returns unless they benefit from an exemption. In some cases, taxes are collected based on a withholding tax mechanism.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	On 17 October 2023, the Council of the European Union adopted the Eight Amendment to the Directive on Administrative Cooperation (so-called "**DAC 8**") expanding the automatic exchange of information to include transactions involving crypto-assets and e-money as reported by crypto-asset service providers ("**CASP**"). This Directive is aligned on CARF and is currently under transposition process into Luxembourg law.
7. If "yes", is there an indication on the implementation and reporting timeline?	DAC 8 will enter into force on 1 January 2026 with a first reporting due by 30 June 2027. In scope CASP which are not regulated under MiCA Directive will also need to register with the tax authorities by 31 December 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	No
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No

Luxembourg (3 of 5)

Direct Tax (3 of 3)

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Luxembourg (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes - Circular letter n°787 dated 11 June 2018.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	In their circular letter n°787 dated 11 June 2018, the Luxembourg VAT Authorities have indicated that cryptocurrencies should generally benefit from the same VAT exemption as the one applicable to "traditional currencies" if the purpose of the cryptocurrencies is to be used as a means of payment and is accepted as such by some operators (article 135.1.e) of the VAT Directive / article 44.1.c) seventh indent of the Luxembourg VAT law). The circular letter from the Luxembourg VAT Authorities is in line with the CJEU case Hedqvist, C-264/14, 22/10/2015). The Luxembourg VAT Authorities did not issue any guidance on the VAT treatment applicable to mining operations nor on the issuance/sale of tokens within the framework of an Initial Coin Offering.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No, there is no definition provided in the Luxembourg VAT law.
4. Treatment of NFTs sold in exchange for cryptocurrency?	The VAT treatment applicable to transactions related to NFTs usually depends on the specific facts and circumstances of the case - as the supplies of NFTs could potentially be qualified as supplies of services that could be subject to VAT in Luxembourg. An analysis is usually recommended.
5. Are there any other applicable exemptions relating to cryptoassets?	There is no specific exemption applicable to cryptoassets except the one provided in the circular letter n°787 from the Luxembourg VAT authorities.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Specific rules should apply when a marketplace is involved in the provision of ESS. These rules are laid down in Article 9a of the EU Regulation 1042/2013.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	The below comments are provided based on the assumption that the sales of NFTs would be made in a B2C context. The marketplace would have the obligation to account for VAT to the extent that (i) the NFTs were to fall within the definition of ESS as per Article 7 of the EU Regulation 282/2011, (ii) that the marketplace would meet the conditions laid down in Article 9a of the EU Regulation 1042/2013 and (iii) no specific exemption would be applicable.

Luxembourg (5 of 5)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No official guidance was published in that respect.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No official guidance was published in that respect.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	There are no specific rules or domestic consultations for crypto asset transaction reporting in Luxembourg applicable for indirect taxes.

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Malaysia (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There currently are no specific provisions or rules in Malaysia that deal with taxation of cryptocurrency or digital currency transactions. Hence, the tax treatment for cryptocurrency activities is based on the existing income tax rules. In this regard, the Malaysian tax authorities (i.e. Inland Revenue Board or "IRB") issued the Guidelines on Tax Treatment of Digital Currency Transactions dated 26 August 2022 ("the Guidelines") which provides guidance on the general tax treatment of digital currencies or digital tokens based on the existing income tax rules
2. If "yes", what is the scope of taxability?	**Income tax** The Guidelines issued by the IRB apply the prevailing tax rules under the Income Tax Act 1967 to treat taxation of digital currency transactions in Malaysia. In general, digital currency transactions would fall within the scope of Malaysian income tax if they relate to income accruing in or derived from Malaysia or received in Malaysia from outside Malaysia. The IRB regards such transactions as falling under the scope of Malaysian income tax if:- • the key activities and business operations are performed in Malaysia; or • where there is a business presence in Malaysia. **Capital gains tax** Malaysia has a 'limited' form of capital gains tax regime (i.e., real property gains tax (RPGT), which is imposed on chargeable gains accruing on the disposal of real properties (i.e., land and buildings) and shares in real property companies). Arguably, gains from disposal of digital currencies should not fall within the scope of RPGT.
3. What are the direct tax implications?	Any gains arising from the digital currency transactions will be subject to income tax if the gains are revenue in nature. In determining whether the gain or loss from the digital currency transaction is capital or revenue in nature, the badges of trade test which is derived from case law precedents (e.g. intention to trade, frequency of transactions, etc) is relevant.

Malaysia (2 of 5)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications? (cont'd)	No single test under the badges of trade is exhaustive and detailed analysis would need to be carried out for each digital currency activity taking into account the taxpayer's facts and circumstances to determine whether it is capital or revenue in nature. For example, a person who actively trades in digital currencies may be viewed as generating revenue while gains derived by an individual who trades occasionally may be viewed as capital gains. On the other hand, digital currencies obtained from a business transaction (e.g. payment received for sale of goods or provision of services) also could be treated as capital investment, subject to meeting the criteria for capital gains. Where gains from digital currency is regarded as capital gain, then such gain should not be subject to income tax.
4. Are there any other relevant/noteworthy tax considerations?	None.
5. What are the tax compliance/ reporting requirements?	There is no separate reporting requirement. Gains arising from the digital transactions that are revenue/income in nature should be declared by taxpayers in their annual income tax return.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Malaysia (3 of 5)

Direct Tax (3 of 3)

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Malaysia (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No. Currently, there is no VAT/GST regime currently in Malaysia. There is, however, a Sales and Service Tax (SST) regime is in place where sales tax applies to the manufacture and importation of taxable goods, and service tax applies to the provision of prescribed taxable services. In respect of sales tax, cryptocurrency is not classified as goods. Thus, the sales tax law does not cover it. In respect of service tax, the provision of digital services (including the provision of electronic medium that allows the suppliers to provide supplies to customers) is a prescribed taxable service and is subject to service tax. The definition of "digital service" is "any service that is delivered or subscribed over the internet or other electronic network and which cannot be obtained without the use of information technology and where the delivery of the service is essentially automated". To date, there has not been any guidance issued by the tax authorities on whether the provision of digital assets (such as digital currency, payment tokens, security tokens or utility tokens) would be considered to be the provision of a digital service. It also is not specifically prescribed to be a taxable service under the Service Tax law.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Non-fungible token (NFT) is not a defined term in any of the sales tax and/or service tax legislations.
4. Treatment of NFTs sold in exchange for cryptocurrency?	As mentioned under Item 1, the tax authorities have not provided any guidance on the tax treatment for digital assets, including NFTs. It is not clear whether NFTs should be considered as a digital service for this case as there is no guidance from the tax authorities.
5. Are there any other applicable exemptions relating to cryptoassets?	The sales tax and service tax legislations provide different exemptions for eligible persons subject to fulfilling the prescribed conditions. However, at this juncture, we consider that the exemptions do not apply to any crypto assets.

Malaysia (5 of 5)

Indirect Tax (2 of 2)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No. However, the Service Tax Regulations 2018 states that any person who operates online platform or marketplace, who provides digital service, including provision of electronic medium that allows the suppliers to provide supplies to customers or transaction for provision of digital services on behalf of any person, excluding provision of such services in relation to matters outside Malaysia.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Generally, the marketplace operator would be liable to account for service tax on the provision of digital service. However, it is not clear whether NFTs should be considered as a digital service in this case as there is no guidance from the tax authorities.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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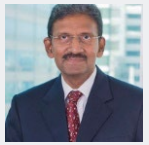

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Malta (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – specific guidance was issued by the Maltese Commissioner for Tax and Customs (MCTC) on the Income Tax Treatment of transactions or arrangements involving DLT assets (the "Guidelines"). The Guidelines were published on the MCTC's website and dated 01/11/2018. There have been no further updates since the release of this version.
2. If "yes", what is the scope of taxability?	**A. Types of DLT Assets for income tax purposes** In terms of the Guidelines, DLT assets are categorised as follows: • **Coins –** this category of DLT Asset typically is a cryptocurrency that is designed to be used as a means of payment or medium of exchange, or function as a store of value: functionally they constitute the cryptographic equivalent of fiat currencies. • **Financial tokens –** this category refers to DLT assets exhibiting qualities that are similar to equities, debentures, units in collective investment schemes, or derivatives, and would be equivalent to such instruments, where they grant rights in a similar fashion as the financial instrument. • **Utility tokens –** this category refers to DLT Assets whose utility, value, or application is restricted solely to the acquisition of goods or services either solely within the DLT platform on, or in relation to which they are issued or within a limited network of DLT platforms. They do not have any connection with the equity of the issuer and do not have the characteristics of a security. **B. General approach to Income tax treatment** The Guidelines provide that the tax treatment of any type of DLT asset depends on the purpose for and context in which it is used, rather than the categorization of the DLT (e.g. as a utility token or as a financial token). The Guidelines provide guidance on: (i) the determination of the value to be used for tax purposes, (ii) records to be kept, and (iii) the treatment of payments made or received using cryptocurrencies. The Guidelines also provide some examples of how the general tax principles apply to certain transactions.

Malta (2 of 5)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications?	In general, from a Maltese income tax perspective, transactions in DLTs should be analysed in the same way and manner as any other transaction. The Guidelines provide further the following guidance on the treatment of transactions in DLT Assets: • **Transactions in Coins** – the proceeds received from the sale of coins as part of a trade (and any gains or profits generated from the mining of cryptocurrency) are treated as ordinary income and taxed accordingly. On the other hand, gains derived from the sale of coins which are held for long-term capital purposes (i.e. which are not held as trading stock) should not be subject to Maltese income tax. • **Return on financial tokens** – The return derived on the holding of financial tokens (which return is similar to dividends, interest, premia, etc.), is treated as income, regardless of whether this return is received in cryptocurrency, fiat currency, or in kind. • **Transfers of financial and utility tokens** – The charging to Maltese income tax would mainly depend on whether the transfer is considered to be a trading transaction or a transfer of a capital asset. If the transfer is a trading transaction, the consideration will be treated as a receipt of income and taxed accordingly. On the other hand, if the transfer of the token is not a trading transaction, it must be determined whether the token is considered to be a "security" for Maltese income tax purposes (e.g. if the token participates in the profits of the company and is not limited to a fixed rate of return). In such an instance, any gain on the transfers of financial tokens should be subject to Maltese income tax. On the other hand, transfers of tokens that do not fall within the definition of "securities," should fall outside the scope of Maltese income tax. • **Treatment of initial offerings** - The proceeds of such an issue are not treated as income of the issuer and the issue of new tokens is not treated as a transfer for the purposes of taxation of capital gains.
4. Are there any other relevant/noteworthy tax considerations?	Refer to the previous section.
5. What are the tax compliance/ reporting requirements?	The tax compliance and reporting requirements should be similar to the tax compliance and reporting requirements for non-DLT asset related entities (e.g. in the case of companies, the filing of an annual Maltese income tax return prepared on the basis of audited financial statements, etc.)

Malta (3 of 5)

Direct Tax (3 of 3)

Question	Response
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	An announcement was published by the Maltese Commissioner for Tax and Customs whereby it indicated that Malta has agreed to the Proposal for a Council Directive amending Directive 2011/16/EU on administrative cooperation in the field of taxation (DAC 8), and, to the Standard concerning the automatic exchange of information agreed at the Organisation for Economic Co-operation and Development (OECD). It also communicated its interest in joining and publishing the Joint Statement: Collective engagement to implement the Crypto-Asset Reporting Framework. An official statement was recently made available at the Maltese Tax Authority website with a commitment to transpose DAC8 by 31 December 2025.
7. If "yes", is there an indication on the implementation and reporting timeline?	No communications other than that referred to in reply to question 6.
8. Are there/do you expect there to be any deviations from the OECD framework?	No communications other than that referred to in reply to question 6.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No communications other than that referred to in reply to question 6.

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Malta (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Issued 01/11/2018 Link: Guidelines for the VAT treatment of transactions or arrangements involving DLT assets
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	In line with case law, the exemptions provided for transactions in currency and related services in terms of the Maltese VAT Act likewise would apply to "transactions, including negotiation" in cryptocurrencies where these have as their sole purpose to serve as a means of payment as an alternative to legal tender. The exchange of cryptocurrencies for other cryptocurrencies or for fiat currency where such exchange constitutes a supply of services for consideration would be covered by these exemptions.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	This likely would depend on the nature of the underlying asset, however, there is no guidance available on the treatment
4. Treatment of NFTs sold in exchange for cryptocurrency?	No guidelines.
5. Are there any other applicable exemptions relating to cryptoassets?	Not that we are aware of.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	None available. However, there is a definition of exchange platforms which are defined as "online platforms which facilitate peer-to-peer trading or exchange of DLT Assets, whether such transactions involve the exchange of Virtual Currencies with fiat, the exchange of Virtual Currencies for other virtual currencies or the exchange/sale of tokens."
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	These should follow the normal VAT rules: a. In so far as the platform's services involves the provision of an electronic facility whereby holders of DLT Assets can trade/exchange (i.e. a technological service that enables and is a component of the execution of a transaction in DLT Assets by the holders/users) then such services should in principle be regarded as taxable. b. However, where the DLT Assets being traded classify as "currency" or "securities" for VAT purposes and where the platform's services go beyond the mere provision of a trading facility, with an increased level of involvement in the transfer or exchange, such services potentially may fall within the exemption.

Malta (5 of 5)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	None available.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	None available.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Mauritius (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Under the Mauritius Income Tax Act 1995, gains or profits derived from the sale of units, securities or debt obligations are tax exempt. With effect from 1 July 2024, the definition of "securities" for the purpose of the above exemption has been amended to include virtual assets and virtual tokens. Thus, any gains derived from sale of cryptocurrency from 1 July 2024 would be tax exempt.
2. If "yes", what is the scope of taxability?	The taxation profile for any sale of cryptocurrency prior 1 July 2024 will depend on the specific facts and circumstances. Where the cryptocurrency was traded as a revenue item, any profit realised on the disposal would be subject to income tax on first principles. Where the cryptocurrency was held as an item of capital nature and sold in a one-off transaction, such a transaction may not fall within the Mauritian income tax net.
3. What are the direct tax implications?	As mentioned above, the direct tax implications for any disposal pre-1 July 2024 would depend on the specific fact pattern.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Mauritius has expressed the intention to commit to join the Crypto-Asset Reporting Framework (CARF) and has joined the CARF working group.
7. If "yes", is there an indication on the implementation and reporting timeline?	Mauritius plans to exchange information on cryptocurrency holdings starting in 2027.
8. Are there/do you expect there to be any deviations from the OECD framework?	No.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Mauritius (2 of 4)

Direct Tax (2 of 2)

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Mauritius (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is no specific tax authority and guidance under the Mauritius Value Added Act 1998 (VATA). VAT may however be applicable based on the general rule. Under Item 50 of the First Schedule to the VAT Act, the issue, transfer or receipt of, or dealing with any stocks, bonds, shares, debentures and other securities are exempted from VAT. In light of the above, given that cryptocurrency is broadly classified as either a virtual asset or a virtual token, this would be classified as a security for income tax purposes, we would expect a similar treatment from a VAT perspective. This would result in supplies of cryptocurrency being exempt from VAT.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Please see above.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs not specifically defined in the Income Tax Act or VAT Act. Please see above with respect to virtual assets and virtual tokens.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not specifically addressed.
5. Are there any other applicable exemptions relating to cryptoassets?	No
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No guidance but general VAT rules may apply.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Mauritius (4 of 4)

Indirect Tax (2 of 2)

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Netherlands (1 of 7)

Direct Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Although there is no legislation specifically addressing the direct taxation on cryptocurrencies and/or crypto assets, a published general note from the Dutch State Secretary of Finance of the Netherlands provides that the regular Dutch tax rules apply to cryptocurrencies and crypto assets.
2. If "yes", what is the scope of taxability?	**Dutch corporate entities** Dutch corporate entities are subject to Dutch taxes for their worldwide income. As a result, any income derived from cryptocurrency activities by a Dutch corporate entity is subject to Dutch corporate income taxes. **Dutch natural persons** Cryptocurrency activities not performed through a Dutch corporate entity should be determined on a case-by-case basis. Dutch natural persons could be subject to taxes for their cryptocurrency activities in two situations. The first situation is that the activities qualify as an active business. For this, the following three cumulative requirements need to be met: 1. It is a sustainable organization of capital and labor; 2. Conducting economic activities; 3. With the intention to make profit. If these three cumulative requirements are met, the results derived from cryptocurrency activities are subject to Dutch personal income taxes up to 49,50%. The second situation is that Dutch natural persons have a cryptocurrency position exceeding the threshold for the Dutch wealth tax. Accordingly, the value of the cryptocurrency position based on the fair market value on one second after 00:00 AM on January 1 of each fiscal year is taken into consideration. If and insofar this fair market value exceeds the applicable threshold(s), 36% (2025 figure) Dutch wealth tax will be due based on a deemed return. These rules are subject to changes following recent case law (we address this in more detail below).

Netherlands (2 of 7)

Direct Tax (2 of 4)

Question	Response
3. What are the direct tax implications?	For Dutch corporate entities, the direct tax implications are that any income derived from crypto activities is included in the Dutch taxable base. For profits up to EUR 200.000 a tax rate of 19% applies and for any profit exceeding this amount a tax rate of 25,8% applies. For Dutch natural persons the direct tax implications are that depending on the actual facts and circumstances either the value of the crypto position could be subject to the Dutch wealth tax, or in case the activities qualify as an active business the income derived from the crypto activities is subject to Dutch personal income taxes at a maximum rate of 49.50%.
4. Are there any other relevant/noteworthy tax considerations?	The Dutch wealth tax rules are subject to changes. Historically, the value of the wealth of a Dutch natural person was taxed based on a deemed (fictional) return. As a result, in case the actual return deviated from the deemed return, the taxes levied could be either (very) low of excessively high. Following case law from 2021, the Dutch wealth tax regime will change in the upcoming period to a regime where the actual (un)realised gains are taxed. However, the rules are intended to enter into force as of 2027. For the interim period, a transitional regime with temporary rules applies. Based on the temporary rules, crypto's qualify as 'other assets' for the Dutch wealth tax regime. Taxation of 'other assets' is based on a deemed (fictional) return of 5.88%. The tax rate on that deemed return is 36% in both 2024 and 2025. We note from a completeness perspective that various Dutch lower courts recently ruled that not only the historic rules but also the temporary rules are in violation of the protection of property (article 1 first protocol of the equality and human rights commission) as the taxes due are based on a deemed (fictional) return. This is because the deemed (fictional) return can result in taxes being due while losses were incurred in a certain year. The Dutch Supreme Court has not decided on this matter yet, but based on the lower court cases there could be arguments that for certain situations the actual return should be taxed and not deemed (fictional) return. It should be reviewed on a case-by-case basis if this position is worthwhile to be taken. * It remains to be determined what elements will be included in the definition of 'actual gains' and how, for example, losses of a certain year could be taken into consideration. This should be determined once a draft and/or final bill of the future legislation is available.

Netherlands (3 of 7)

Direct Tax (3 of 4)

Question	Response
5. What are the tax compliance/ reporting requirements?	For Dutch corporate entities, the filing deadline for the Dutch corporate income tax return generally is 1 June of the year following the filling period. However, extensions are generally available for a total period of approximately 1.5 years after the year following the filing period. For Dutch natural persons, the filing deadline for the Dutch personal income tax return is 1 May of the year following the filing period
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Following the adoption of DAC8 in the European Union, the Dutch Ministry of Finance took action to align national legislation with the new directive. On 24 October 2024, the Ministry published a draft bill proposing changes to the International Law Assistance in the Levying of Taxes Act (Wet op de internationale bijstandsverlening bij de heffing van belastingen). This draft bill aims to implement DAC8 into Dutch national law, ensuring that the Netherlands complies with the expanded requirements for the automatic exchange of information regarding crypto assets and e-money transactions. The draft bill was submitted to the Dutch Parliament on July 7, 2025, and is expected to enter into force on January 1, 2026.
7. If "yes", is there an indication on the implementation and reporting timeline?	The directive must be largely implemented by January 1, 2026. From that date, providers of crypto-asset services are required to report data and information about executed transactions with crypto-assets to the competent authority of the member state. The first reports are scheduled for submission by 31 January 2027, covering transactions in the calendar year 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	Yes, in contrast to the OECD CARF Framework, the EU DAC8 and the proposed national Dutch law encompass both domestic and cross-border transactions, as well as domestic and foreign crypto-asset users.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Yes, to ensure compliance with domestic reporting requirements, the Dutch Ministry of Finance has proposed an amendment to the General Tax Act (AWR). This amendment will make the reporting of reportable transactions in crypto assets mandatory for domestic transactions. It is important to acknowledge that, as the legislation is currently in the draft and implementation phase, its scope remains subject to modification.

Netherlands (4 of 7)

Direct Tax (4 of 4)

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Netherlands (5 of 7)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	The Dutch tax Authorities released several documents which provide insights on the tax authorities' -internal- view on the Dutch VAT treatment of (services regarding) cryptos. Furthermore, there is a ruling by a lower court in the Netherlands dating early October 2021 that a bitcoin miner has a 75% right to recover paid input VAT based on statistics, but otherwise there is no formal guidance or article in the law covering cryptocurrency transactions.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Depending on the facts and circumstances of the specific service that is to be provided. In general, there should be room to apply a Dutch VAT exemption for certain services related to cryptos.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs are not defined in the Dutch VAT Act or any other law, decree or government publication. From a Dutch VAT perspective any transaction that does not constitute a supply of goods, is considered a supply of services for Dutch VAT purposes. A supply of goods is the transfer or transmission of the capacity to dispose of goods as owner. Based on this definition, immaterial objects are for Dutch VAT purposes generally labeled as services. Following the concept of NFTs and their intangible nature, we do not consider the sale of NFTs a supply of goods. Hence, we regard the sale of NFTs as a supply of services for Dutch VAT purposes and the likeliest qualification of supplying an NFT (so not minting) is indeed that of an electronic service or ESS.
4. Treatment of NFTs sold in exchange for cryptocurrency?	A supply of services in exchange for cryptocurrency is in scope for Dutch VAT insofar the cryptocurrency is considered as a means of payment (see paragraph 5 below). Our understanding is that the remuneration for the NFT in an amount of cryptocurrency has no other purpose than to act as a means of payment. This reasoning is based on the application of CJEU Hedqvist following from which it must be determined whether cryptocurrency acts as a means of payment and that it is accepted for that purpose by both parties involved. In that regard no barter trade would occur. It must be noted that in respect of a number of tokens it is still to be determined whether it acts as a means of payment.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes. According to CJEU Hedqvist, 'cryptocurrency' as such is categorised as a means of payment even though it's no official tender. This assessment must be made for each type of token to determine whether that is the case.

Netherlands (6 of 7)

Indirect Tax (2 of 3)

Question	Response
5. Are there any other applicable exemptions relating to cryptoassets? (cont'd)	According to a lower Dutch court, certain cryptocurrencies (i.e. Bitcoin) can be seen as a means of payment because Bitcoins can be used in different places to buy goods and services. The transfer of the cryptos should then not be taxable for VAT purposes. If cryptocurrency is not considered as a means of payment, then it should be assessed whether there are other VAT exemptions that could apply or whether the exchange results in VAT being charged.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The Dutch VAT Act provides for a description of an electronic interface, such as a marketplace, platform, portal, or a similar medium.* *In the non-binding explanatory notes the concept of an electronic interface is further explained as; a broad concept which allows two independent systems or a system and the end user to communicate with the help of a device or programme. An electronic interface could encompass a website, portal, gateway, marketplace, application program interface (API), etc.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	This depends on the function and involvement of the marketplace within the transaction. In the event the marketplace acts as a commissioner, and intervenes by taking part in the supply, the marketplace has to account for VAT on the sale of NFTs. This follows from a legal presumption that the marketplace is acting on its own name and on behalf of the provider of the NFT. If such intervention occurs depends on the contractual agreements between the parties (e.g. can the marketplace influence the price, does the marketplace issue an invoice and provide customer service?).
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	In 2023 the Dutch tax Authorities published a position paper on the sale of NFT tokenized art and detailed whether the special VAT scheme for works of art was applicable to the sale of this NFT. The special VAT scheme explicitly applies to a supply of goods. The DTA shared its view that a digital artwork, whether or not delivered electronically through an NFT, does not constitute a tangible object subject to human control and therefore is not considered a supply of goods for Dutch VAT purposes. From this position paper we conclude that the tokenisation does not follow the Dutch VAT treatment of the tangible object that is tokenized, but must be determined on its own merits. https://kennisgroepen.belastingdienst.nl/publicaties/kg20920232-btw-tarief-digitale-kunst/

Netherlands (7 of 7)

Indirect Tax (3 of 3)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	In so far cryptos qualify as e-money these might be reportable for CESOP. Where these do not qualify as e-money, it needs to be investigated whether the crypto-assets qualify as reportable product for either CARF or CRS2.0 (depending product and license of entity involved).

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New Zealand (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes. While there are no specific laws addressing the taxation of crypto assets (other than to confirm that crypto assets are not financial arrangements for New Zealand tax purposes), the New Zealand Inland Revenue Department (IRD) published guidance on the tax treatment of various crypto assets transactions (https://www.ird.govt.nz/cryptoassets). The IRD has also released a number of binding rulings (which set out IRD's interpretation of how tax law applies to a particular arrangement, person or item of property) in respect of certain crypto asset transactions.
2. If "yes", what is the scope of taxability?	While there is currently no defined term that dictates the scope of taxability, IRD uses the term "crypto asset" to cover a broad range of cryptocurrencies, tokens and other assets that are cryptographically secured digital representations of value that can be transferred, stored or traded electronically.
3. What are the direct tax implications?	Some of the key clarifications provided by the IRD with respect to the taxation of crypto assets are: • Crypto assets are classified as a form of intangible property for direct tax purposes. • While New Zealand does not have a comprehensive capital gains tax regime, in most cases gains derived from disposing of crypto assets (including selling for fiat currency, trading for another crypto asset, using crypto assets to acquire goods or services, staking income and sending crypto assets as a gift) will be subject to income tax due to an IRD presumption that the crypto assets are generally acquired for the purpose of disposal. There appears to be limited circumstances where IRD will accept that a taxpayer did not acquire the relevant crypto asset for the purpose of disposal. Some of the key clarifications provided by the IRD with respect to the taxation of non-fungible tokens (NFTs) are: • Any royalties derived by the creator of an NFT under a smart contract each time the NFT is sold will generally be subject to income tax. • Gains on the sale of NFTs will be subject to income tax if: 1. the taxpayer a business of creating NFTs; 2. the taxpayer buys and sell NFTs to make a profit; or 3. the taxpayer acquired NFTs for the purpose of disposal.

New Zealand (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	• Crypto assets are specifically excluded from New Zealand's financial arrangements tax rules (with effect from 1 January 2009). • Employers are required to account for either pay as you earn (PAYE) income tax or fringe benefit tax (FBT) in relation to crypto assets provided to employees. • In most cases, crypto assets received from mining will be treated as a form of taxable income (although the IRD accepts that in limited circumstances a taxpayer may be mining crypto assets as a non-taxable hobby).
5. What are the tax compliance/ reporting requirements?	• Any cryptocurrency gains and losses should be included in the taxpayer's annual income tax return filed with IRD. • Taxpayers are also required to keep records of their taxable crypto asset transactions to support the position taken in their income tax return, including the types of crypto assets, dates of transactions, number of units transacted, and the value of the crypto assets in NZD. These records are required to be retained for at least 7 years, even once the relevant crypto assets have been disposed of. • IRD recently announced that it is stepping up its compliance activities for taxpayers with crypto assets.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes, IRD consulted on the implementation of the OECD Crypto Asset Reporting Framework (CARF) in 2022. Legislation was passed in March 2025 to give legislative effect to the CARF.
7. If "yes", is there an indication on the implementation and reporting timeline?	The legislation enacting CARF will be implemented in New Zealand from 1 April 2026. On this timeframe: • New Zealand-based reporting crypto asset service providers are required to collect information on the transactions of reportable users that operate through them from 1 April 2026. • These reporting crypto asset service providers need to report this information to IRD by 30 June 2027. IRD would exchange this information with other tax authorities (to the extent it relates to reportable users resident in that other jurisdiction) by 30 September 2027.

New Zealand (3 of 5)

Direct Tax (3 of 3)

Question	Response
8. Are there/do you expect there to be any deviations from the OECD framework?	The legislation provides for the CARF to be incorporated into New Zealand law by reference to the OECD rules without any deviations. There is regulation-making power capable of blocking the effect of any future changes to the CARF if necessary.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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New Zealand (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – the Goods and Services Tax Act 1985 (NZ) ('GST Act') covers the position and sets out the rules. Inland Revenue issued commentary on the GST changes following the enactment of the GST rules for cryptocurrency in 2022.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Cryptocurrency (as defined) is excluded from GST - cryptocurrency is neither a taxable supply nor an exempt supply. The relevant definitions provide that a crypto asset means a digital representation of value that exists in (a) a database that is secured cryptographically and contains ledgers, recording transactions and contracts involving digital representations of value, that are maintained in decentralized form and shared across different locations and persons; or (b) another application of the same technology performing an equivalent function. Cryptocurrency means a crypto asset that is not a non-fungible token (NFT).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Yes, GST Act: NFT means a crypto asset that contains unique distinguishing identification codes or metadata.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Yes, standard rated at 15% (domestic transactions). See further below in relation to cross border NFT transactions and the ESS / remote services rules.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes - options over cryptocurrency and brokerage in respect of cryptocurrency transactions are GST-exempt.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Marketplace.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Yes, GST Act 1985 (NZ). electronic marketplace (a) means a marketplace that is operated by electronic means through which a person (the underlying supplier) makes a supply of goods, or of remote services by electronic means, through another person (the operator of the marketplace) to a third person (the recipient); and (b) includes a website, internet portal, gateway, store, distribution platform, or other similar marketplace; and (c) does not include a marketplace that solely processes payments.

New Zealand (5 of 5)

Indirect Tax (2 of 2)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	The rules around 'barter transactions' could apply with the GST position depending on the GST status of the parties.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Nigeria (1 of 7)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	**Capital Gains Tax**: Yes – The Capital Gains Tax Act (CGTA) as amended by the Finance Act, 2023 (FA) includes provisions relevant to the taxation of digital assets including cryptocurrency. Based on the amended law, gains on disposal of digital assets will be subject to 10% tax on capital gains. **Companies Income Tax**: There is no specific provision for the taxation of income earned from exchange of cryptocurrency. However, trading income and fees earned by a company from trading cryptocurrencies are liable to tax at an effective rate of 33% (similar to any other trading company) effective 1 September 2023. **Recent developments in regulatory framework:** The Nigeria Tax Act, 2025 (NTA). This new tax law has an implementation date of 1 January 2026 and replaces previous tax laws such as the Companies Income Tax Act, Capital Gains Tax Act, Personal Income Tax Act etc.. The NTA defines assets as follows: "digital assets" means digital representation of value that can be digitally exchanged, including, but not limited to, crypto assets, utility tokens, security tokens, non-fungible tokens (NFT), such other similar digital representation or derivatives of any of the listed or similar assets and any other asset as may be defined by the relevant regulatory authority. The rate of taxation of capital items such as the digital assets has been raised to 30%. However, if where the trading of digital assets forms the principal activity of a trading company such incomes would be taxed depending on whether the company is a small or large company. The NTA has modified the definition of a small and large company as follows: Small companies are companies with a gross turnover of NGN50m or less per annum with total fixed assets not exceeding NGN250m (doesn't apply to professional services). The profits of small companies are taxed at a rate of 0%. Any company that does not meet the criteria of a small company would be seen as a large company and its profits would be taxed at 30%. Hence, the rate of capital gains tax is dependent on whether the company selling it is small (0%) or large (30%).

Nigeria (2 of 7)

Direct Tax (2 of 3)

Question	Response
2. If "yes", what is the scope of taxability?	**Capital Gains Tax:** The Finance Act, 2023 amended Section 3(a) of the CGTA to include digital assets as part of assets liable to CGT. Based on this amendment, **gains arising** from disposal of such assets became taxable effective from 1 September 2023. Although the term "digital asset" is not explicitly defined in the CGTA, it is generally understood to capture virtual assets such as cryptocurrencies, non-fungible tokens (NFTs), Central Bank Digital Currency (CBDCs) amongst others. **Companies Income Tax:** Trading income and fees earned by a company from trading cryptocurrencies are liable to be taxed at an effective rate of 33% effective 1 September 2023
3. What are the direct tax implications?	**In the hands of seller (where it does not qualify as trading income)**: The gains from the sale of digital assets are taxable in the hands of the seller at 10%. CGT returns are to be filed at the earliest of 30 June or 31 December by the person disposing of the property. Losses from the digital assets are deductible against taxable gains from the same type of assets. Losses not utilised can be carried forward for a period of 5 years after the year they are incurred.
4. Are there any other relevant/noteworthy tax considerations?	**The Central Bank of Nigeria (CBN) prohibits trading in cryptocurrencies:** Despite the inclusion of digital assets as assets chargeable under the CGT Act, the CBN prohibits banks from holding, trading and/or transacting in virtual currencies on their own account.
5. What are the tax compliance/ reporting requirements?	**In the hands of seller (Where it does not qualify as trading income)**: • As stipulated in Section 2(4) of CGTA, the seller is to compute Capital Gains Tax, file self-assessment returns and pay the tax computed in respect of chargeable assets disposed to the relevant tax authority before the due date. • Due date of filing Capital Gains Tax returns and payment of Capital Gains Tax is the earlier of 30 June and 31 December of the year of disposal of the chargeable asset.

Nigeria (3 of 7)

Direct Tax (3 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	• To provide clarity to stakeholders, the FIRS published an information circular on Clarifications on the Provisions of Capital Gains Tax (CGT) Act, No. 2021/09 dated 3 June 2021 ("CGT Circular"). The CGT Circular clarifies that the due dates for filing returns and payment of CGT for a given transaction shall be the earlier of 30 June or 31 December.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Nigeria (4 of 7)

Direct Tax (4 of 4)

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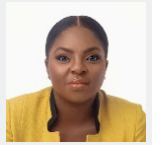

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Nigeria (5 of 7)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	**GST/VAT:** No – The Value Added Tax (VAT) Act does not have any specific provision for the taxation of cryptocurrency in Nigeria. The tax authorities have also not issued any specific guidance on the applicability of VAT on cryptocurrency. Nonetheless, in 2020, the Nigerian Securities Exchange Commission (SEC) issued a statement which highlighted that virtual crypto assets are securities, unless proven otherwise by the issuer or sponsor. The SEC continues to hold this position in subsequent amended publications issued in 2024. Based on the VAT Act, securities are out of scope and excluded from the definition of a taxable good or service. Thus, sale / transfer of cryptocurrency to the extent that they are securities, and not intangible property would not be liable to VAT in Nigeria. **ESS:** Our understanding is that ESS relates to electronically supplied services, i.e. services provided over the internet or an electronic network using automated information technology with little to no human intervention. There are no specific VAT rules for ESS cryptocurrency transactions. Consequently, the position highlighted above regarding GST/VAT also applies to ESS cryptocurrency transactions, to the extent that such transaction is deemed to be strictly a supply of cryptocurrency without any additional services/value offered e.g. trade facilitation. Based on the VAT Act, the supply of money or securities is out of scope and excluded from the definition of taxable good or service. However, where the service provider earns additional fees that are not limited to the supply of crypto currency e.g. trade facilitation fees, such additional service will be deemed as VATable and the fees earned will be subject to VAT at 7.5%.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	N/A
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	**Definition:** No, non-fungible tokens (NFTs) are not defined by the VAT Act. Although there is no clarification on the nature and taxation of NFTs, money and securities do not constitute taxable goods or services under the VAT definition in Nigeria. Intangibles on the other hand are referred to as services for VAT purposes. The categorisation of an NFT as money, security or intangible property is not clearly defined in our VAT law. This therefore leaves room for direction and clarity from the tax authority or a court of competent authority.

Nigeria (6 of 7)

Indirect Tax (2 of 3)

Question	Response
4. Treatment of NFTs sold in exchange for cryptocurrency?	Same as above.
5. Are there any other applicable exemptions relating to cryptoassets?	No, there is not.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No, there is no specific definition of marketplace for VAT/ESS/remote services. However, there is a Guideline issued by the tax authority to clarify the obligations, process and procedures for compliance of non-resident suppliers of goods and services through digital means to businesses or consumers in Nigeria. The Guideline expressly indicates that goods or services supplied through a marketplace / platform (although the term is not defined) are liable to VAT in Nigeria. This aligns with the broad description of services liable to VAT in the Act. This includes all services (except specifically exempt) provided to or consumed by a person in Nigeria regardless of location of service provider.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Based on Section 10 and Section 14 of the VAT Act, a non-resident, local supplier involved in the supply of a taxable good or service in Nigeria is required to account for VAT on its invoice. Furthermore, the tax authority in a published Guideline appointed all non-resident suppliers providing a taxable supply through digital means to collect VAT and remit the same to the tax authority. In the event where such VAT is not included in the invoice, the person to whom taxable supply is made in Nigeria is required to self-account for the VAT payable and remit to the tax authority.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No, there is no specific guidance on the application of VAT on ESS or the tokenisation of real-world assets.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No, there are no specific de-centralised finance rules for VAT and ESS.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No, Nigeria has no specific rules or domestic consultations for crypto asset transaction reporting for indirect taxes.

Nigeria (7 of 7)

Indirect Tax (3 of 3)

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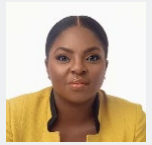

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Norway (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes. Cryptocurrency and other virtual instruments follow the same tax principles as other capital investments. Hence, gains are taxable and losses are deductible. The Norwegian Tax Administration has issued general guidance on taxation and declaration of virtual assets: https://www.skatteetaten.no/en/person/taxes/get-the-taxes-right/shares-and-securities/about-shares-and-securities/digital-currency/ and https://www.skatteetaten.no/en/person/taxes/get-the-taxes-right/shares-and-securities/about-shares-and-securities/digital-currency/tax-regulations-virtual-currency/
2. If "yes", what is the scope of taxability?	Virtual assets, including cryptocurrency, are treated the same way as other financial assets. Virtual assets are not subject to exemptions or special tax rules that apply to regular currencies, shares, bonds, financial instruments, or other types of assets with special exemptions. Concrete assessments must be made in respect to deducting or booking cost for tax purposes.
3. What are the direct tax implications?	All income from virtual assets is taxable at a rate of 22% • In the event of realization of cryptocurrency, capital gains are taxable and losses deductible. Gain or loss is calculated by the difference between the input value and the exit value. • Income from 'mining' cryptocurrency that is considered business activity will be included in the calculation of personal income for self-employed individuals. • Expenses that incur when generating income from virtual assets are considered capital expenses and can be deducted at a rate of 22%.
4. Are there any other relevant/noteworthy tax considerations?	Norway imposes a wealth tax on personal taxpayers where the net wealth surpasses NOK 1.7m. Virtual assets are included in the assessment of a person's wealth.

Norway (2 of 5)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements?	Purchases and mining of virtual assets must be declared in the annual tax return for income tax and wealth tax purposes. As a starting point, the Norwegian Tax Administration pre-files the annual tax return for individuals. However, holding, purchase or sale of Bitcoin or other virtual currencies is not reported automatically to the Tax Administration. It is the taxpayer's responsibility to report any holdings for wealth tax purposes and gains/losses of Bitcoin or other virtual currencies in their annual tax return. The form RF-1159 is no longer in use starting from the income year 2023).
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The Norwegian Ministry of Finance has announced their proposal to implement CARF into Norwegian law. The Norwegian Tax Administration has also issued a guidance on international reporting (CRS/FATCA). Several changes were made concurrently with the development of CARF, aimed at simplifying the reporting process and preventing the duplication of information that falls under CARF. https://www.skatteetaten.no/globalassets/bedrift-og-organisasjon/rapportere-og-bransjer/tredjepartsopplysninger/internasjonal-rapportering/2024/guidance-on-international-reporting-crs-and-fatca.pdf
7. If "yes", is there an indication on the implementation and reporting timeline?	The Ministry proposes that the legislative amendments to implement CARF into Norwegian law take effect on January 1, 2026, with the first reporting to tax authorities in 2027.
8. Are there/do you expect there to be any deviations from the OECD framework?	The new provisions in Norwegian legislation for the implementation of CARF are intended to be sufficiently broad to encompass new technologies, emerging markets, and new market participants, rather than being confined strictly to the stipulations of CARF. Nevertheless, the provisions should be interpreted in alignment with CARF and its interpretative guidelines.

Norway (3 of 5)

Direct Tax (3 of 3)

Question	Response
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	The proposed amendments to Norwegian law also require service providers to: • disclose information about all their users, not just those who are tax residents in Norway. • disclose the value of the user's held cryptocurrency assets. It is noted that service providers not tax resident in Norway, but still required to report here, should provide the same information as those who are tax residents.

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Norway (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes, the Norwegian Tax Administration has published general guidelines on the tax and VAT treatment of cryptocurrency: https://www.skatteetaten.no/en/business-and-organisation/reporting-and-industries/industries-special-regulations/internet/tax-and-vat-on-virtual-currencies/
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Cryptocurrency is normally split into two main segments, cryptocurrency mining and cryptocurrency exchange service. Both cryptocurrency exchange service and mining of cryptocurrency such as Bitcoin normally will be regarded as financial services which are exempt from VAT. However in relation to mining, a company that only provides the data power (data centers) will be subject to VAT (25%).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	The term "NFT" serves as a collective descriptor for artworks created using digital tools. These artworks are digital files generated and stored in a digital format, either as regular data files or on a blockchain. The primary ruling regarding the VAT treatment of NFTs is a statement from the Norwegian Tax Authority from February 2023, where the Norwegian Tax Authorities states that NFT is considered as an "electronic service": https://www.skatteetaten.no/en/rettskilder/type/uttalelser/prinsipputtalelser/merverdiavgift---avgiftsbehandling-av-digitale-kunstverk-etter-merverdiavgiftsloven--3-7-fjerde-ledd/ As a general rule, electronic services are subject to Norwegian VAT. However, the sale of the copyright of NFTs is exempt from VAT (same assessment as "traditional art") if: 1. The NFT in question is considered intellectual property according to the Norwegian Intellectual Property Act, and 2. The NFT is sold by the creator of the NFT (or someone acting on their behalf).
4. Treatment of NFTs sold in exchange for cryptocurrency?	NFTs sold in exchange for cryptocurrency should be exempt from VAT, ref. question 3. This is due to the fact that both the purchase and sale of NFTs and cryptocurrency trading are normally exempt from VAT.

Norway (5 of 5)

Indirect Tax (2 of 2)

Question	Response
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable provided that the sale of NFTs is exempt from VAT, ref. Q3. In the event that sales of NFTs do not meet the requirements to be treated as VAT exempt, the sales could be regarded as VAT relevant supplies of electronical services for both the seller and the marketplace, cf. section 3-1 (4) of the Norwegian VAT Act. Since the marketplace would then normally be party which is considered to "supply" the service to the customer from a VAT perspective, only the marketplace would normally be required to register for Norwegian VAT when the electronic service is purchased from outside the Norwegian VAT area. However, this would depend on a concrete assessment of the facts (e.g. the VAT status of the customer etc.).
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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Oman (1 of 4)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No.
2. If "yes", what is the scope of taxability?	Gains/losses from cryptocurrency are likely to be taxed/deducted as capital gains under the existing Oman Income tax law.
3. What are the direct tax implications?	Same as above.
4. Are there any other relevant/noteworthy tax considerations?	None that we are aware of.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	None that we are aware of.
7. If "yes", is there an indication on the implementation and reporting timeline?	None that we are aware of.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Oman (2 of 4)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, Oman Value Added Tax Executive Regulations (Article 29) **Electronically Supplied Services** mean, in application of item (4) of Article (24) of the VAT Law, services supplied directly through the internet or an electronic network, where the supply of the services is principally automatic and requires minimum human interference and can be supplied only with the use of information technology, and include in particular the following services: • Supply of digitised products generally including software and changing or upgrading a software. • Providing or supporting a business or personal presence on an electronic network such as a website or a webpage. • Services automatically generated from a computer via the Internet or an electronic network in response to specific data input by the recipient. • Transfer of the right to put goods or services up for sale on an internet site operating as an online market on which potential buyers make their bids by an automated procedure for a consideration and on which the parties are notified of a sale by electronic mail automatically generated from a computer. • Internet Service Packages (ISP) of information in which the telecommunication component forms an ancillary and subordinate part (i.e., packages going beyond mere Internet access and including other elements such as content pages giving access to news, weather or travel reports, playgrounds, website hosting and access to online debates).

Oman (3 of 4)

Indirect Tax (2 of 3)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	• Internet access and including other elements such as content pages giving access to news, weather or travel reports, playgrounds, website hosting and access to online debates). • Website hosting and webpage hosting. • Providing digitised content of books and other electronic publications. • Providing access and subscriptions to online newspapers and journals, online news, traffic information and weather reports. • Accessing or downloading music, jingles, excerpts, ringtones, or other sounds. • Accessing or downloading films, video, games, including online games that are dependent on the internet, or other similar electronic networks, where players are geographically remote from one another. • Supply of distance education services. • The supply of advertising space on a website and the related rights to that advertisement. • Live broadcast via the internet. Based on the e-commerce VAT guide released by the Oman Tax Authority - E-commerce means the supply of goods and services through electronic means such as websites, electronic platforms, social media stores, or an electronic application. The online marketplace, forum, or similar applications may act as an agent or intermediary to facilitate transactions of selling goods or services from the supplier to the customer that allow the completion of the transaction through them.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable. There are no provisions around this at the moment.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No, not at this stage.

Oman (4 of 4)

Indirect Tax (3 of 3)

Question	Response
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No, not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	As per Article 30 of the Oman VAT Executive Regulations. The place of supplying the Electronically Supplied Services is located in the place of actual usage of these services or enjoying them.

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Panama (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No – However there was a Bill approved in the National Assembly regarding crypto assets which was not approved by the Executive Branch and ultimately deemed “Unjustifiable” by the Supreme Court of Justice (August 9, 2023). The Court found the Bill to be unjustifiable because in the opinion of the Court certain procedures were not appropriately followed; the ruling was not specifically due to the purpose or nature of the Bill.
2. If “yes”, what is the scope of taxability?	Not applicable.
3. What are the direct tax implications?	Not applicable.
4. Are there any other relevant/noteworthy tax considerations?	There are no restrictions duly established by law. In fact, the activities carried out through this or another instrument of that category do not fall within the competence/supervision of the Superintendency of Banks of Panama (SBP) or the Superintendency of the Securities Market of Panama (SMV) considering cryptocurrencies are not securities according to the regulation (these Regulators emphasize that cryptocurrencies are not regulated in Panama and therefore there is a risk in using these cryptocurrencies). Finally, it should be noted that recent opinions state that authorized traders cannot trade cryptocurrencies. In any case, if income is being earned as a result of these activities within Panama, such income could be subject to income tax. Also, if a fee is being charged by a non-resident, the service is related to the generation of taxable income by the recipient in Panama and such recipient wants to consider the payment deductible for income tax purpose, withholding tax could be applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No.
7. If “yes”, is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Panama (2 of 4)

Direct Tax (2 of 2)

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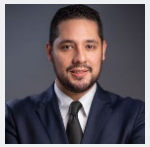

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Panama (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No – However the Bill was approved in the National Assembly regarding crypto assets. It was not approved by the Executive Branch and ultimately deemed “Unjustifiable” by the Supreme Court of Justice (August 9, 2023). The Court found the Bill to be unjustifiable because in the opinion of the Court certain procedures were not appropriately followed; the ruling was not specifically due to the purpose or nature of the Bill.
2. If “yes”, what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not applicable.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not currently regulated but in theory “no” as it is an intangible.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not regulated.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not regulated.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Panama (4 of 4)

Indirect Tax (2 of 2)

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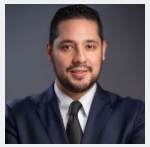

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Philippines (1 of 6)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is no specific tax law or special regulations on cryptocurrencies in the Philippines, however, cryptocurrency transactions are subject to general income tax rules.
2. If "yes", what is the scope of taxability?	The entire income arising from cryptocurrency transactions within a taxable period shall become part of the gross income of the taxpayer for that period. Under general tax law, gross income includes all income derived from whatever source (subject to exceptions). However, the scope of the Philippines' tax jurisdiction differs based on the taxpayer's tax residency and the situs of the source of income, as follows: • An individual who is a citizen of the Philippines and residing therein is taxable on all income derived from sources within and without the Philippines; • A nonresident citizen is taxable only on income derived from sources within the Philippines; • A non-citizen of the Philippines, whether resident or not, is taxable only on income derived from sources within the Philippines; • A Philippine corporation is taxable on all income • derived from sources within and without the Philippines; and • A foreign corporation, whether engaged or not in trade or business in the Philippines, is taxable only on income derived from sources within the Philippines.
3. What are the direct tax implications?	Cryptocurrencies are treated as property for tax purposes, thus, gains from selling or exchanging these are taxable either as capital or ordinary asset depending on its treatment. If classified as a capital asset, the applicable tax is 15% Capital Gains Tax (CGT). If classified as ordinary asset, the income covered in the immediately preceding item are generally treated as follows, subject to exceptions (e.g. certain types of income which are subject to a fixed withholding tax rate): • For citizens of the Philippines and resident alien individuals: A graduated rate ranging from 0% to 35% or an option to avail an eight percent (8%) tax on gross sales/gross receipts and other non-operating income in excess of P250,000 for purely self-employed individual and/or professionals who gross sales or gross receipts and other non-operating income does not exceed the VAT threshold.

Philippines (2 of 6)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications? (cont'd)	• For non-resident alien individuals doing business in the Philippines (i.e. stayed in the Philippines for an aggregate period of 180 days in a calendar year), and non-resident foreign corporations: The same graduated rate ranging from 0% to 35% • Domestic and resident foreign corporations are subject to a 25% corporate income tax; and • Non-resident foreign corporations, or non-resident alien individuals not doing business in the Philippines are generally subject to withholding tax at a rate of 25% on their Philippine-source income, unless qualified for exemption under a relevant tax treaty
4. Are there any other relevant/noteworthy tax considerations?	Depending on the tax residency of the income earner, specific types of income are subject to the withholding tax system wherein the direct income tax is captured by the withholding agent, who then remits the same to the tax authority. For example, a domestic corporation paying royalties to a resident Filipino citizen for his/her musical work must withhold withholding tax at a rate of 20% which must be remitted to the Tax Authority. Concurrently, the withholding agent must also issue a withholding tax certificate to the income earner. Additionally, individuals and companies listed in a published list of top withholding agents (TWAs) are required to withhold income at a rate of 1% for goods and 2% for services. Thus, TWAs making payments through a cryptocurrency transaction may be required to deduct 1% withholding tax for goods and 2% withholding tax for services. Thus, TWAs making payments through a cryptocurrency transaction may be required to deduct 1% withholding tax for goods and 2% withholding tax for service. If considered Philippine-sourced income, cryptocurrency payments to non-resident foreign corporations, or non-resident alien individuals not engaged in trade or business in the Philippines are generally subject to withholding tax at a rate of 25% unless qualified for exemption under a relevant tax treaty. The foregoing rates are just the general rule, and it needs to be emphasized that the Philippines' withholding tax system can be more complex.
5. What are the tax compliance/ reporting requirements?	All taxpayers are required to file an income tax return (ITR). Generally, individual taxpayers file their ITR annually, unless they are engaged in business, in which case they will file three (3) quarterly ITR and one (1) annual adjustment return. The ITRs must include income arising from cryptocurrency operations and/or transactions.

Philippines (3 of 6)

Direct Tax (3 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	As for withholding taxes, the withholding agent is required to report and/or remit withholding taxes to the Government monthly except for the third month of each taxable quarter, in which case the withholding taxes are remitted and reported through a quarterly return (which should also include information pertaining to preceding two months of the taxable quarter).
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The tax authority has not yet issued guidance that specifically provides a framework for the reporting of crypto assets. In view thereof, existing tax reporting rules shall generally apply to crypto assets. Nevertheless, the Philippines announced its commitment to adopt the OECD's Crypto-Asset Reporting Framework (CARF), which introduces standardized reporting obligations and facilitates the automatic exchange of information on crypto assets across jurisdictions. This commitment signals a move toward greater transparency and alignment with international tax compliance standards.
7. If "yes", is there an indication on the implementation and reporting timeline?	The Philippines commits to adopt and implement CARF by 2028.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Philippines (4 of 6)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	While there is no clear guidance yet from the tax authority specifically on cryptocurrency, other government agencies, e.g., the Securities and Exchange Commission (SEC), have issued guidance treating cryptocurrencies as securities, while the Bangko Sentral ng Pilipinas (BSP) issued regulations on cryptocurrency exchanges. The SEC has also advised that those who do not comply with the registration and disclosure requirements—where the virtual currencies offered are in the nature of a security—would be reported to the BIR so that the appropriate penalties and/or taxes can be assessed. Further, recent issuances by the tax authority may have an impact on certain cross-border transactions, including those involving cryptocurrencies, e.g., Cross-border services, i.e. those rendered outside of the country, but the output or results are used or consumed in the Philippines, are now subject to 12% VAT. The Philippines also passed a recent law subjecting digital services to VAT (e.g., Digital Services Act). Digital service refers to any service that is supplied over the internet or other electronic network with the use of information technology and where the supply of the service is essentially automated, and shall include, among others, online search engine, online marketplace or e-marketplace, cloud service, online media and advertising, online platform, or digital goods. In this regard, the law provides that: • The services of non-Philippine resident digital service providers (DSPs) are now subject to 12% VAT; • Non-Philippine resident DSPs (NDSPs) are now required to withhold and remit 12% VAT from payments made by customers in the Philippines who are not VAT-registered. For this purpose, the NDSPs shall register with the Tax Authority for VAT purposes.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Pursuant to the Digital Services Act, exchanges involving cryptocurrencies may be deemed sale of digital or intangible goods subject to 12% value added tax (VAT). Digital services (including digital goods) provided by a resident or nonresident supplier of digital services to a consumer who uses digital services are now subject to 12% VAT.

Philippines (5 of 6)

Indirect Tax (2 of 3)

Question	Response
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No. There is no special recognition of Non-Fungible Tokens (NFT) in Philippine tax laws. On the other hand, these may come within the ambit of “digital goods” as mentioned under the Digital Services Act, which imposes 12% VAT on digital services and goods supplied over the internet and consumed in the Philippines.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Cryptocurrencies and NFTs are treated as property for tax purposes under general tax principles. If sold or exchanged in the course of trade or business, these transactions may be subject to income tax and, where applicable, VAT under rules for digital goods and services. While there is no explicit provision classifying NFTs or cryptocurrencies as “digital goods,” they may fall under this category when supplied digitally. For regulatory purposes, cryptocurrencies and other virtual assets are covered under the Anti-Money Laundering Act, and entities facilitating such transactions (e.g., exchanges and service providers) must comply with AML/CFT requirements.
5. Are there any other applicable exemptions relating to cryptoassets?	There are no special exemptions on crypto assets.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes. Under pertinent tax regulations, the following types of transactions are mentioned under which ESS/remote services may fall: a. Online shopping or online retailing; b. Online intermediary service; c. Online advertisement/classified ads; and d. Online auction. Further, as mentioned under the Digital Services Act, digital service providers include, among others, online search engines, online marketplaces or e-marketplaces, cloud services, online media and advertising, and online platforms.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Under the Digital Services Act, a nonresident digital service provider (NDSP) required to be registered for VAT shall be liable for the remittance of VAT on the digital services that are consumed in the Philippines, if the consumers are non-VAT registered. If a VAT-registered NDSP is classified as an online marketplace or e-marketplace, it shall also be liable to remit the VAT on the transactions of nonresident sellers that go through its platform.

Philippines (6 of 6)

Indirect Tax (3 of 3)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	There are currently no specific tax guidelines or regulations on the tokenization of real-world assets in the Philippines. While the Digital Services Act covers digital goods and services supplied online, tokenized assets are not explicitly addressed. In practice, the token is treated as a digital representation of the underlying asset, which means its tax treatment may differ from that of the real-world asset, depending on the nature of the transaction.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	There are currently no specialized VAT rules or regulations on decentralized finance (DeFi) in the Philippines. Existing VAT provisions under the Digital Services Act apply to digital goods and services supplied online, but DeFi platforms are not explicitly covered. Income from DeFi activities may be subject to income tax under general tax principles, but no indirect tax guidance has been issued.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	There are currently no specific rules or consultations in the Philippines focused on indirect tax reporting for crypto-asset transactions. While the Senate has initiated inquiries on the regulatory framework for cryptocurrencies and digital currencies, these discussions primarily address oversight and consumer protection rather than VAT compliance. Existing VAT rules under Republic Act No. 12023 apply to digital services and goods supplied online, which may include certain services offered by crypto platforms, but there is no dedicated guidance for crypto transactions.

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Portugal (1 of 7)

Direct Tax (1 of 5)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes, since 2023. For the purposes of PIT (and SD taxation), the law establishes a definition of crypto assets, which includes all digital representations of values or rights that can be transferred or stored electronically using distributed ledger technology or similar. Unique and non-fungible crypto assets (e.g. NFT) are excluded from this definition.
2. If "yes", what is the scope of taxability?	**Corporate Income Tax (CIT)** No specific scope of taxability applies to crypto assets under the Portuguese CIT rules. Nonetheless, profits generated by crypto assets may give rise to taxable events under the CIT general provisions. **Personal Income Tax (PIT)** The income arising from crypto assets may be taxed under three different income categories (business and professional income, investment income or capital gains), depending on certain circumstances. Please see point 3. below for further clarifications
3. What are the direct tax implications?	**Corporate Income Tax (CIT)** There is no specific guidance and, in general, no specific provisions apply to crypto assets, nonetheless, profits generated from crypto assets generally are subject to CIT. In the 2023 State Budget, the simplified taxation regime for taxpayers with low turnover was adjusted to be aligned with the PIT, regarding the coefficients related to crypto assets related to business income. **Personal Income Tax (PIT)** 1) Business and Professional Income The validation of crypto assets transactions through consensus mechanisms (mining and on-chain staking) are considered commercial and industrial activities, and the related income is subject to PIT accordingly within the scope of the Category B of income (Business and Professional Income).

Portugal (2 of 7)

Direct Tax (2 of 5)

Question	Response
3. What are the direct tax implications? (cont'd)	For the purposes of the simplified taxation regime, the taxable income is computed by applying the coefficient of 0.15 to the sales of crypto assets. The coefficient is 0.95 in the case of mining of crypto assets (penalization of mining activities due to its non-sustainable impact). The income is deemed realised at the moment of the transfer of the crypto assets for consideration. Additionally, both the termination of the (self-employment) activity and the cease of Portuguese residency are equivalent to transfers for consideration (exit tax). 2) Investment income Any type of remuneration derived from investment of crypto assets (as defined by the Portuguese tax legislation) qualifies as investment income for PIT purposes. As a rule, investment income is liable to a 28% flat tax rate, or 35% in case the income is deemed as sourced from a "blacklisted" jurisdiction. However, in case the income is received in the form of crypto assets, capital gain (rather than investment income) taxation applies. In this case, the taxation is deferred to the moment in which the crypto assets received are transferred for consideration and some exclusions may apply as referred below. According to the forms available last here for the submission of the Portuguese annual personal income tax returns, there are no reporting obligations if the investment income is received in the form of crypto assets. 3) Capital gains Gains obtained with the transfer for a consideration of crypto assets are regarded as capital gains for PIT purposes. The taxable gain corresponds to the difference between the sales proceeds (presumably the market value at the time of the transfer) and the acquisition value. Necessary and effective expenses incurred with the acquisition and transfer are deductible. The FIFO (First In, First Out) method is used to determine the taxable income. The positive balance between capital gains and capital losses is subject to a flat rate of 28%. The taxpayer can opt to aggregate the amount to the remainder income and have it rather taxed at progressive rates up to 48%, plus solidarity tax when due. Any capital loss on a transfer of crypto assets can be carried forward for five years, when the taxpayer opts to aggregate its income.

Portugal (3 of 7)

Direct Tax (3 of 5)

Question	Response
3. What are the direct tax implications?	**Exclusions** Gains arising from the transfer for a consideration of crypto assets held for 365 days or more are excluded from taxation (although excluded, the taxpayer is still required to report these gains in the section for non-taxable capital gains in their annual personal income tax return). As a rule, losses with crypto assets held for 365 days or more are also disregarded. In the case of crypto assets acquired prior to 1 January 2023, on the computation of this period of time, it is relevant the holding period that has already elapsed. No taxation arises on crypto assets held for less than 365 days whose consideration on a transfer is also crypto assets. The acquisition value of the crypto assets received is the same as that of the crypto assets delivered. However, the exclusions above are not applicable if the taxpayers or the paying entity are not tax resident in another Member State, or in a State member of the European Economic Area or in another State with which a convention for the avoidance of double taxation, or a bilateral agreement or a multilateral agreement is in force and foreseen the exchange of information for tax purposes. **Exit tax** The cease of Portuguese tax residency is equivalent to triggering a transfer for a consideration, which is taxed as a capital gain.
4. Are there any other relevant/noteworthy tax considerations?	As a rule, taxation of capital gains only applies to exchanges for fiat currency, and there is an exemption on capital gains on assets older than 365 days or more. There is now an exit tax. There are still several open topics for which there is still no clear answer (for example, some questions on how to operationalise the reports in the annual personal income tax return and on how to comply with other obligations [e.g., invoicing] associated with Business and Professional activity/income).

Portugal (4 of 7)

Direct Tax (4 of 5)

Question	Response
5. What are the tax compliance/ reporting requirements?	**In the hands of the taxpayer**: filing annual income tax returns. In case of a Business and Professional activity with crypto assets, there are some registration and reporting obligations to be followed. **In the hands of Exchange/ Broker:** there may be some tax reporting obligations for natural or legal persons, organisations and other entities without legal personality, all providing services of custody and management of crypto assets on behalf of third parties or managing one or more platforms for the negotiation of crypto assets. However, currently, there is no tax authority guidance on how to proceed.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No, there are currently no predictions on when the tax authorities will implement the Crypto Asset Reporting Framework. However, given the commitments made by the Portuguese Republic within the European Union, it is expected that Council Directive (EU) 2023/2226 of 17 October 2023 amending Directive 2011/16/EU on administrative cooperation in the field of taxation (DAC8) will be transposed into Portuguese law by 31 December 2025.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Portugal (5 of 7)

Direct Tax (5 of 5)

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Portugal (6 of 7)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The Portuguese Tax Authorities ("PTA") follow the ECJ decision regarding cryptocurrency and understands that it qualifies as "coins used as legal tender". As such transactions related to bitcoins are exempt under Article 135 (1) (e) of the VAT Directive.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is no definition of NFTs in the Portuguese Law. In principle, they are subject to VAT.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Subject to VAT.
5. Are there any other applicable exemptions relating to cryptoassets?	No exemption is foreseen for crypto assets that are not qualified as "coins used as legal tender."
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, in the Portuguese VAT Code.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	When a marketplace is involved, the ESS rules apply made, meaning that in B2B transactions the acquirer should self-assess the VAT and in B2C transactions the supplier must account for VAT. Any taxable person, regardless of their place of establishment, who provides an electronic interface that allows third parties to sell goods or offer services, is jointly liable for the VAT due on those transactions if they know or should know that the seller or service provider is not remitting the VAT to the Portuguese tax authorities.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Portugal (7 of 7)

Indirect Tax (2 of 2)

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Qatar (1 of 2)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No. There are no specific tax rules for cryptocurrency.
2. If “yes”, what is the scope of taxability?	Not applicable.
3. What are the direct tax implications?	Not applicable.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Not applicable.
7. If “yes”, is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Qatar (2 of 2)

Indirect Tax

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is no GST / VAT / ESS regime in Qatar.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not applicable.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not applicable.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not applicable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not applicable.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not applicable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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Saudi Arabia (1 of 3)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No
2. If "yes", what is the scope of taxability?	Domestic tax rules will apply in respect of income accruing from cryptocurrency. KSA WHT applicable in case of payments to non-resident entities (subject to available relief under applicable DTAs), unless the non-resident entity has a permanent establishment in KSA.
3. What are the direct tax implications?	Corporate tax at 20% (for corporate taxpayers) and 2.5% Zakat (for Zakat-payers).
4. Are there any other relevant/noteworthy tax considerations?	N/A
5. What are the tax compliance/ reporting requirements?	KSA residents – part of annual tax filing (120 days after the end of the financial year) Non-KSA residents – resident party to file a WHT return 10 days following the month in which the payment was made.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	N/A
7. If "yes", is there an indication on the implementation and reporting timeline?	N/A
8. Are there/do you expect there to be any deviations from the OECD framework?	N/A
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	N/A

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Saudi Arabia (2 of 3)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No, the KSA VAT Law and its Implementing Regulations do not contain any specific treatment for cryptocurrency, neither has any guidance been issued by the tax authority.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	NFTs has not been defined neither any specific ta treatment is provided by the tax authority.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No such treatment has been defined.
5. Are there any other applicable exemptions relating to cryptoassets?	No specific treatment/exemption has been mentioned in the prevailing VAT legislation.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	The KSA VAT Implementing Regulations state under Article 47(4) that an electronic marketplace refers to an electronic or digital platform, or its equivalent, whose primary purpose, or one of its primary purposes, is to enable suppliers to showcase their products (whether goods or services) or provide, make available, or contract them with the customers benefitting from them.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No specific guidance on sales of NFTs are available at the moment. Generally speaking Article 47 of the KSA VAT Implementing Regulations details specific features of transactions related to electronic marketplaces which will determine which entity will have the obligation to account for VAT. Ultimately, the marketplace's VAT liability depends on the extent of its involvement in the transaction, residency and tax registration status of the supplier and the clarity of the contractual and invoicing arrangements, which need to be assessed on a case-by-case basis.

Saudi Arabia (3 of 3)

Indirect Tax (2 of 2)

Question	Response
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No specific guidance is available at the moment.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No specific guidance or public consultations for crypto assets are currently or historically been available.

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Singapore (1 of 8)

Direct Tax (1 of 5)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	The Inland Revenue Authority of Singapore ('IRAS') has published an e-Tax Guides, namely Income Tax Treatment of Digital Tokens on 17 April 2020.
2. If "yes", what is the scope of taxability?	The IRAS e-Tax Guide seeks to provide a certain level of clarity on the treatment of digital tokens and the tax implications in connection with income derived from such investments / transactions. The e-Tax Guide is not legally binding on taxpayers, however, it is based on general tax principles and provides an indication of the IRAS's views. Digital Tokens are cryptographically-secured digital representation of value that can be transferred, stored or traded electronically. The IRAS classifies digital tokens into 3 types: (i) payment tokens; (ii) utility tokens; and (iii) security tokens. The general income tax treatment is summarised below.
3. What are the direct tax implications?	**Payment tokens** • Businesses/individuals are subject to normal corporate income tax rules, regardless of whether the payment is in the form payment tokens or cash for goods and services. • The tax treatment of gains or losses derived from disposal of digital tokens will depend on whether it is capital or revenue in nature unless Section 10L detailed further at (4) below is applicable. • Businesses can claim a tax deduction when it uses payment tokens to pay for goods or services. The value is based on the underlying goods or services when received. Currently, IRAS does not prescribe any methodology to value payment tokens. Taxpayers can use an exchange rate that best reflects the value of tokens received, provided that two conditions are satisfied: (i) the exchange rate must be reasonable and verifiable; (ii) the methodology used to determine the exchange rate should be consistently applied year on year. The valuation method used should be substantiated by supporting documentation. IRAS retains the right to enquire into the valuation method used by taxpayers. • Generally, where the payment tokens are not accounted for under Financial Reporting Standard 109, unrealised changes in the fair value of the payment tokens should not be taxable or deductible.

Singapore (2 of 8)

Direct Tax (2 of 5)

Question	Response
3. What are the direct tax implications? (cont'd)	**Utility tokens** • The acquisition of utility tokens is treated as prepayment for goods or services to be provided in the future. • Issuers are subject to income tax when the goods or services are provided or performed. • Businesses can claim a tax deduction on the amount incurred when a token is used in exchange for goods or services. Subject to tax deduction rules, a deduction should be allowed on the amount incurred at the point the token is used to exchange for the goods or services. **Security tokens** • The rights and obligations of security tokens will determine whether the token is regarded as debt or equity for tax purposes. This determines the nature of the returns derived from the security token (e.g., interests, dividends, or other distributions) and accordingly, their tax treatment. • Interest or dividend derived by the holder (depending on whether the token is characterised as debt or equity) should be treated according to normal tax rules. Issuer who incurs interest, or other distributions may claim tax deduction on such payments. • Withholding tax obligations may apply to interest and/or other distributions made to non-tax residents. • The tax treatment of gains or losses derived from the disposal of digital tokens will depend on whether the security token is capital or revenue in nature and whether section 10L detailed further at (4) below is applicable. The e-Tax Guide also discusses the tax treatment of initial coin offerings (ICOs) and the taxability of mining activities, airdrop and hard fork. i. ICOs The taxability of the ICO proceeds in the hands of the issuer depends on the rights and functions of the tokens issued to investors. Besides the initial taxability of the proceeds from the ICO, an issuing entity may also be subject to income tax on subsequent realisation gains.

Singapore (3 of 8)

Direct Tax (3 of 5)

Question	Response
3. What are the direct tax implications? (cont'd)	ii. Receiving payment token through mining. The taxability of a miner's profits from the disposal of payment tokens (including those obtained from a mining pool) depends on whether the miner performs the mining activity with an intention to profit. iii. Receiving payment token through airdrop The taxability of receipt of a payment token through airdrop depends on whether the payment token was received in return for any goods or services performed. If it is, it could be viewed as income subject to tax. On the other hand, if it is not, it should not be regarded as income of the recipient and hence is not taxable. iv. Receiving payment token through hard fork This can be viewed as a windfall to the recipient as he had received the additional token without doing anything in return. As this is not an income, it should not be taxable for the recipient at the point of receipt. Where the recipient is trading in payment tokens, the gains from the subsequent disposal of the tokens (including tokens received through hard fork or through airdrop) should be taxable.
4. Are there any other relevant/noteworthy tax considerations?	Effective 1 January 2024, section 10L of the Singapore Income Tax Act introduces a new provision that taxes gains from the sale or disposal of foreign assets when such gains are received in Singapore by entities within a relevant group. This provision applies to entities, including corporations, general partnerships, limited partnerships, and trusts, that are part of a group with consolidated financial statements, where at least one member conducts business outside Singapore. However, certain entities, such as financial institutions, those with specific tax incentives, and those meeting economic substance requirements, are exempt. For section 10L, the gain subject to tax is calculated using sales proceeds less the historical cost. Foreign assets include securities issued by a company and intangible movable property (including any right or interest in such intangible movable property) , with the location of such assets determined according to specific rules. In this regard, digital assets, including cryptocurrencies or security tokens, may be considered foreign assets that are subject to section 10L.

Singapore (4 of 8)

Direct Tax (4 of 5)

Question	Response
4. Are there any other relevant/noteworthy tax considerations? (cont'd)	Entities within a relevant group that hold or trade digital assets should evaluate whether gains from the disposal of these assets, when received in Singapore, might be subject to Singapore's corporate income tax at a rate of 17% under section 10L. For further information on section 10L, please refer to the attached tax bulletin: https://www.pwc.com/sg/en/tax/assets/bulletin/2024-01.pdf
5. What are the tax compliance/ reporting requirements?	Taxpayers are subject to the normal compliance / reporting requirements on crypto transactions. IRAS has stipulated that taxpayers should keep proper records of transactions and provide them to IRAS upon request. These supporting records should include information such as: 1. Date of transaction 2. Number of units of digital tokens received or sold 3. Value of digital token at the time of the transaction 4. Exchange rate used 5. Purpose of the transaction 6. Details of customers/suppliers (for buy-sell transactions) 7. Details of the ICO 8. Receipts/invoices of business expenses.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	On 26 November 2024, Singapore committed to the implementation of the Crypto-Asset Reporting Framework ("CARF") and is expected to commence exchanges in information by 2027 or 2028 at the latest. The IRAS has not released guidance in connection with the implementation of CARF.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.

Singapore (5 of 8)

Direct Tax (5 of 5)

Question	Response
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Singapore (6 of 8)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – the Goods and Services Tax Act 1993 (“GST Act”) and e-tax guide GST: Digital Payment Tokens (Second Edition) https://www.iras.gov.sg/media/docs/default-source/e-tax/e-tax-guide_gst_digital-payment-tokens.pdf?sfvrsn=da8cafda_22
2. If “yes”, what is the position for GST / VAT / ESS or equivalent?	Prior to 1 January 2020, supplies of digital tokens / virtual currencies / cryptocurrencies were treated as a taxable supply of service and subject to GST at either the standard rate of 7% or zero-rated. With effect from 1 January 2020, supplies of “digital payment tokens” (“DPT") is treated as follows: • The use of DPTs as payment for goods or services will no longer give rise to a supply of those tokens. • A supply of DPTs in exchange for fiat currency or other DPTs, and the provision of any loan, advance or credit of DPTs will be exempt from GST. The GST treatment for digital tokens / virtual currencies / cryptocurrencies that do not qualify as “DPT” remain unchanged. The definition of DPT is legislated in the GST Act.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No, NFT is not defined in the GST legislation. Currently, only the term “digital payment token” is defined in the GST Act, NFTs do not qualify as DPTs based on the legislative definition of DPT as they are non-fungible. Hence, GST at the standard rate (9% with effect from 1 January 2024) will apply unless the supply qualifies for zero-rating.

Singapore (7 of 8)

Indirect Tax (2 of 3)

Question	Response
4. Treatment of NFTs sold in exchange for cryptocurrency?	GST treatment on the supply of NFT Please refer to question 3 above. Supply of NFT, cryptocurrency used as payment is not a DPT Barter transaction (i.e. Seller of NFT is making a supply to customer; Customer is making a supply of cryptocurrency to Seller). Supply of NFT, cryptocurrency used as payment is a DPT The customer is not regarded as making a supply of cryptocurrency to the seller as the use of DPT as a form of payment will not give rise to a supply.
5. Are there any other applicable exemptions relating to cryptoassets?	Generally, no, although certain crypto-assets such as tokens which grant the holder shares in the issuer's company would qualify for exemption under another legislative provision in the GST Act.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, the term "electronic marketplace" is defined under the Seventh Schedule to the GST Act as a medium that: • allows the suppliers to make supplies available to customers by electronic means; and • is operated by electronic means. The definition excludes any medium that is solely for processing any payment for any supply. The operator of an electronic marketplace will be regarded as the supplier, if any of the following conditions are met: • The operator authorises the consideration for the supply to be charged to the customer; • The operator authorises the delivery of supply to the customer (e.g. sends approval to commence delivery, delivers the service itself or instructs developer / third party to make delivery etc.); • The operator sets the terms and conditions under which the supply is made (e.g. having control over pricing etc.);

Singapore (8 of 8)

Indirect Tax (3 of 3)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes? (cont'd)	• There is documentation provided to the customer identifying the supply as being made by the operator and not the underlying supplier; or • The operator and the underlying supplier contractually agree that the operator is liable for GST.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Usually the marketplace operator, subject to the operator meeting the conditions to be regarded as supplier (refer to question 6 above). The obligation applies to the supply of NFTs made on behalf of the overseas suppliers listed on the operator's platform to non-GST registered customers ("B2C") in Singapore. This is unless the marketplace opts to (and have obtained approval from the tax authority) to charge and account for GST on all B2C remote services made by both local and overseas suppliers through the marketplace.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	None currently. The token would generally be regarded to have a different character/nature from the underlying real-world asset.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not at this stage.

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Slovakia (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Taxation of cryptocurrency is prescribed by the Slovak Income Tax Act. Also, there is a methodical guideline issued by the Ministry of Finance back in 2018, and some additional clarifications in the online portal of SK tax authorities.
2. If "yes", what is the scope of taxability?	Sale of crypto assets is subject to tax. For direct tax purposes sale means sale of crypto assets for currency, crypto assets exchange for any assets (including other crypto assets) or services. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2003/595/?ucinnost=28.01.2025#paragraf-2.pismeno-ai
3. What are the direct tax implications?	Income gained from the sale of crypto assets is reported as a part of general taxable income. There are no specific tax rates for crypto assets. Income of non-residents from crypto assets sale can be also subject to SK taxation if paid by SK tax residents of SK PE of non-residents. Tax rates for CIT are 10%/21%/24% depending on the annual level of taxable revenue. Tax rates for PIT are 19%/25%/30%/35% depending on the annual level of taxable revenue.
4. Are there any other relevant/noteworthy tax considerations?	Losses from the sale of crypto assets cannot be recognized. https://www.slov-lex.sk/ezbierky/pravne-predpisy/SK/ZZ/2003/595/?ucinnost=28.01.2025#paragraf-19.odsek-2.pismeno-v
5. What are the tax compliance/ reporting requirements?	No specific reporting for the direct tax. For non-resident's income taxation tax return should be submitted in SK together with payment of SK tax.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No, but Slovakia will have implement DAC8 requirements on exchange of information about crypto assets in its local legislation. First exchange of information is anticipated in 2027 for 2026. https://www.financnasprava.sk/sk/infoservis/avi#:~:text=kB%3B%20nov%C3%A9%20okno%5D-,DAC8%2FCARF,okt%C3%B3bra%202023%20(tzv

Slovakia (2 of 4)

Direct Tax (2 of 2)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Slovakia (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes, the tax authorities issued several guidelines (legally non-binding) related to the VAT treatment of cryptocurrencies.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Cryptocurrency (as defined) is generally excluded from the VAT as it does not represent taxable supply. However, supply of goods or services, where the remuneration is received in cryptocurrency, is subject to VAT. Similarly, exchange of cryptocurrencies for another cryptocurrency is subject to VAT (VAT exempt service). The relevant definitions are: **Crypto-assets** generally mean a digital expression of value or rights that can be transferred and stored electronically using "distributed ledger" or similar technology. Crypto-assets cannot be considered as securities or financial instruments. **Cryptocurrencies** are cryptoassets that function exclusively as a unit of account and means of payment for VAT purposes. https://www.financnasprava.sk/_img/pfsedit/Dokumenty_PFS/Zverejnovanie_dok/Dane/Metodicke_usmernenia/Nepriame_dane/2023/2023.05.30_004_DPH_2023_MU.pdf
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No specific guideline related to non-fungible token has been released.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No guidelines with respect to NFT. Generally, exchange of cryptocurrency for another cryptocurrency is treated as a VAT exempt service.
5. Are there any other applicable exemptions relating to cryptoassets?	If the providers of digital wallets provide services for consideration (e.g. managing, keeping a digital wallet, storing and transferring cryptocurrency) and there is a direct connection between this consideration and the services provided, such service is VAT exempt. https://www.financnasprava.sk/_img/pfsedit/Dokumenty_PFS/Zverejnovanie_dok/Dane/Metodicke_usmernenia/Nepriame_dane/2023/2023.05.30_004_DPH_2023_MU.pdf
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, specific concept of electronic marketplace is applied when a taxable person facilitates the B2C supply of goods in the territory of the European Union ("EU") by a taxable person not established in the territory of the EU through the use of an electronic communication interface.

Slovakia (4 of 4)

Indirect Tax (2 of 2)

Question	Response
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Generally, electronic marketplace has the obligation to account for VAT in B2C supplies realized by a non-EU entity as described above. However, no specific guidelines related to NFTs with respect to electronic marketplace has been released.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No specific guidance.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No specific guidance.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No specific reporting of crypto asset transaction for indirect taxes.

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Slovenia (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	The Slovenian tax authorities have issued general guidance on the tax treatment from Personal Income Tax, Corporate Income Tax and from the Financial Services Tax perspective. • The Slovenian government already has received various proposals for laws on this topic, but to date none of them have been implemented.
2. If "yes", what is the scope of taxability?	Income derived from trading and mining of virtual currencies (i.e. crypto tokens), receipt of payments or other income, payment for a service performed in virtual currencies are all considered within the scope of taxability.
3. What are the direct tax implications?	**Personal income tax:** • Personal income tax is not paid on capital gain from disposal of virtual currencies if the currencies are not considered as capital (per Article 93 of the Slovene PIT Act) or are considered as derivative financial instruments, under the condition that the natural person does not generate such income in connection with a business activity. • Income generated by a natural person by virtual currency mining is taxed in accordance with the PIT Act either as other income or income from business activity. • In the taxation of a natural person who receives such tokens for free upon the issue of new tokens, the general bases for income taxation as per the Personal Income Tax Act are considered (i.e. with regard to the nature of income that was paid as a token and with regard to the relationship between payer and recipient resulting in the provision of income). • A natural person performing a business activity is obliged to pay personal income tax on income from business activity, and to calculate and pay social security contributions. An individual's income derived from virtual currency trading or mining is considered as income from business activity when it is achieved by the permanent, independent and autonomous performance of an activity. **Corporate income tax:** • Possession of Bitcoins and other virtual currencies in business ledgers must be reported as financial investments valued at fair value through P/L statement and noted in the balance sheet on a certain cut-off date.

Slovenia (2 of 4)

Direct Tax (2 of 2)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	**Personal income tax:** • The tax return form for assessing personal income tax prepayment for other income must be submitted by the taxable person to the tax authority within fifteen days of the date of receiving income.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes - a draft law proposes a 25% tax on individuals' gains from crypto disposals and sets out a crypto-asset reporting approach (with DAC8/CARF to be implemented via the Tax Procedure Act), which requires reporting on crypto payments exceeding EUR 500.
7. If "yes", is there an indication on the implementation and reporting timeline?	No schedule on implementation date yet. The act is planned to apply to tax periods starting 1 January 2026.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Slovenia (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	The Slovenian tax authorities have issued general guidance on the tax treatment from the Value Added Tax perspective and from the Financial Services Tax perspective. The Slovenian government already has received various proposals for laws on this topic, but to date none of them have been implemented.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	The **commission or payment for exchanging a traditional currency for a virtual currency or vice versa** is exempt from VAT. **Virtual currency mining** is a transaction not subject to VAT. The **services of exchange platforms** which operate as brokers are subject to VAT. **Digital wallet services** performed for payment are exempt from VAT payment. If a start-up company issues a crypto token when it is still not known for which products and services the token could be exchanged in the future, the condition of direct connection between the performed service and received counter-value is not fulfilled yet and the transaction of token issuance is not subject to VAT. When the crypto token is used to pay for individual products and services, these transactions will be subject to VAT (considering the nature of the supply of goods or services, transactions will be taxed at the prescribed tax rate or exempt from VAT payment). If a certain functionality is already installed in issued tokens – meaning that by purchasing the tokens, supporters acquire the option to use a product or service (in the initial phase, supporters receive them at a lower price than users who buy them later) or they can be considered as a security that generates some kind of yield for investors (payment of dividends or distribution of profit from operations), or they can even have a hybrid character (the functionality and character of a security) – and in such a context, a direct connection between the performed service and received payment can be determined, then the token transaction is subject to VAT, whereby the taxation depends on the character of an individual token and is assessed on a case-by-case basis
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No guidance available.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No guidance available.
5. Are there any other applicable exemptions relating to cryptoassets?	No.

Slovenia (4 of 4)

Indirect Tax (2 of 2)

Question	Response
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No guidance available.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidance available.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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South Africa (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes.
2. If "yes", what is the scope of taxability?	In terms of South African income tax law, cryptocurrencies or crypto assets are financial instruments. As cryptocurrencies are neither legal tender in South Africa nor widely used and accepted as a medium of payment or exchange, cryptocurrencies are not regarded by the South African Revenue Service ('SARS') as a currency for income tax or Capital Gains Tax ('CGT') purposes.
3. What are the direct tax implications?	The tax treatment of any transaction must be considered on a case-by-case basis, e.g., the income tax treatment of gains or losses derived from mining or trading cryptocurrencies, as opposed to holding the assets for long term capital appreciation, will be determined based on general revenue vs capital considerations. Goods or services purchased (or rather traded) for cryptocurrency will be barter transactions and will be taxed accordingly. SARS has further confirmed that taxpayers are entitled to claim expenses associated with crypto assets receipts or accruals as deductions, provided that such expenditure meets the requirements of the general deduction provisions of the Income Tax Act 58 of 1962 ('the Act'), which (amongst others) includes requirements that the expenditure must be incurred in the production of the taxpayer's income and for purposes of his/her trade.
4. Are there any other relevant/noteworthy tax considerations?	It is worth noting that where crypto asset gains or losses are classified as revenue in nature, crypto trading losses can be deducted in accordance with the applicable provisions of the Act. However, in this regard, it is important to note that since the acquisition and disposal of a crypto asset has been listed as a 'suspect trade', crypto losses will be ring-fenced (i.e., crypto losses can only be set off against future crypto gains and not gains derived from any other trade) for natural persons where the maximum marginal rate of tax (i.e., 45%) is applicable to them, unless there is a reasonable prospect of deriving taxable income within a reasonable period having regard to certain predefined factors contained within the Act. Another important consideration is the existence of stringent exchange control regulations in South Africa which regulate cross border flows of funds into and out of the country. In terms of these regulations, cryptocurrency and virtual currency are not considered legal tender in South Africa and are, therefore, not recognised as a legitimate payment method or electronic money. Cross border transactions must, therefore, occur through the physical flow of funds and any such payments in the form of cryptocurrency will not be allowed under the regulations.

South Africa (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations? (cont'd)	Lastly, since the last publication of this report, the South African Reserve Bank ('SARB') has published a working paper which provides an analysis of the potential benefits, risks, and regulatory implications of adopting crypto assets in the South African financial sector.
5. What are the tax compliance/ reporting requirements?	Crypto assets have been included in the definition of 'financial products' in the Financial Advisory and Intermediary Services Act 37 of 2002 (FAIS) effective from 19 October 2022. Consequently, crypto asset service providers (including exchanges, brokers, platforms, and advisors) will be required to register as financial service providers (also known as "Crypto Asset Service Providers" ('CASP')) under the FAIS. Issuers of crypto "tokens" are, however, not specifically regulated under South Africa's securities and financial markets laws. The Financial Sector Conduct Authority ('FSCA') has indicated in its 2024 Regulation Plan that this gap will be addressed in future amendments. The regulatory framework for crypto assets is expected to be updated when the Conduct of Financial Institutions ('COFI') Bill is introduced. CASPs have also been included in the list of accountable institutions in Schedule 1 to the Financial Intelligence Centre Act ('FICA'). Consequently, CASPs will be required to register with the Financial Intelligence Centre and will be subject to the customer due diligence, risk management compliance obligations set out in FICA. Lastly, it is expected that crypto asset service providers will soon be required to submit third party returns in accordance with section 26 of the Tax Administration Act 28 of 2011.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes. In November 2023, South Africa, together with 46 other countries and the United Kingdom's overseas territories, issued a joint statement to work towards transposing the OECD's Crypto-Asset Reporting Framework ('CARF') into its domestic law.
7. If "yes", is there an indication on the implementation and reporting timeline?	South Africa intends to incorporate the CARF into its domestic law and activate exchange agreements in time for exchanges to commence by 2027, subject to the completion of its applicable local legislative procedures.

South Africa (3 of 5)

Direct Tax (3 of 3)

Question	Response
8. Are there/do you expect there to be any deviations from the OECD framework?	Historically, South Africa has implemented the OECD's guidelines (e.g., the OECD's Transfer Pricing Guidelines) with minimal or no modification in order to ensure that its domestic law aligns with international best practices. We, therefore, do not expect there to be any significant deviations from the CARF.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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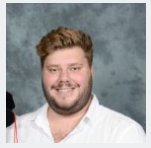

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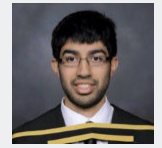

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South Africa (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – Value-Added Tax Act 89 of 1991 ("VAT Act") covers the position and sets out the rules.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Section 12 of the VAT Act provides for the exemption of financial services as defined. Section 2 of the VAT Act defines financial services and includes the issue, acquisition, collection, buying or selling or transfer of ownership of any cryptocurrency. Therefore, cryptocurrency is exempt from VAT.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No, it is not defined. The current position on the taxation of NFTs is unclear as no guidance has been published to date from a VAT perspective. In the absence of specific guidance on the taxability of NFTs the ESS rules need to be applied. Generally, NFTs are considered to fall within the ambit of the ESS rules and are thus subject to VAT. This is for non-resident suppliers of such NFTs. Local suppliers of NFTs fall under the standard enterprise rules.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No specific guidance has been published to date from a VAT perspective by the Revenue Authority on any cryptocurrency related transactions. As mentioned, the sale of NFTs by a non-resident will likely be subject to VAT under the ESS rules but the supply of cryptocurrency in exchange therefore is exempt from VAT.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No definition for this in the legislation but the guidance issued in respect of ESS in the past refers to an 'intermediary' which is defined in the law as a person who facilitates the supply of electronic services on behalf of a supplier and who is responsible for issuing the invoices and collecting payment for the supply.

South Africa (5 of 5)

Indirect Tax (2 of 2)

Question	Response
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	The intermediary (marketplace) accounts for VAT if the principal supplier is a non-resident of South Africa and is not registered for VAT. If the principal supplier has an obligation to register for VAT, the principal supplier will need to account for the VAT itself, even if made available through a marketplace. This typically happens when the supplies are directly made by the principal supplier and available through a third-party platform. We note that there are current legislative changes coming into operation on 1 April 2025 which will change the above to the supply being deemed to be made by the intermediary if the intermediary and principal agree as such.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidance has been published on this aspect as yet. The VAT treatment will depend on the circumstances and nature of the transaction and has not been clarified yet. There are specific rules relating to the VAT treatment of vouchers / tokens, however, these may not necessarily apply to these circumstances. It is recommended that these transactions be considered on their merit to determine the correct VAT treatment.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No specific rules – the standard VAT reporting rules will apply.

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Spain (1 of 8)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – There are specific rules in connection with the reporting of operations with crypto currencies which became applicable in 2023, and declared for the first time in 2024. In connection with any other tax field, not specific rules but only binding rulings issued by the tax administration.
2. If "yes", what is the scope of taxability?	Those binding rulings have been issued regarding VAT, Personal Income Tax, Non-Resident Tax, Wealth Tax and Tax on Economic Activities (Local Tax)
3. What are the direct tax implications?	Broadly speaking, cryptocurrency trading implies capital gains/losses for Personal Income Tax Purposes. Regarding Corporate Income Tax, the applicable taxation will depend on the accounting treatment.
4. Are there any other relevant/noteworthy tax considerations?	Losses have to be well supported and documented in order to obtain the corresponding tax deductibility in the Personal Income Tax.
5. What are the tax compliance/ reporting requirements?	**TAX REPORTING FOR EXCHANGERS AND CUSTODIANS** Widely speaking, the information to be provided relates to the operations (acquisition, transmission, exchange, transfer, collection and payments) and balances on virtual currencies: (i) the nominal relationship of subjects involved, with indication of their address and tax identification number, (ii) class and number of virtual currencies transmitted or held by December 31st, (iii) price and date of the operation or value of the virtual currencies held by December 31st. The persons obliged to report the relevant information are: • Regarding the balance held in virtual currencies: persons and entities resident in Spain and permanent establishments in Spanish territory of persons or entities resident abroad, providing services on behalf of third parties for safeguarding private cryptographic keys and to maintain, store and transfer virtual currencies, whether said service is provided on a principal or in connection with another activity.

Spain (2 of 8)

Direct Tax (2 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	**TAX REPORTING FOR EXCHANGERS AND CUSTODIANS** • Regarding the operations with virtual currencies: the following persons and entities resident in Spain and the permanent establishments in Spanish territory: (i) those who provide exchange services between virtual currencies and legal tender or between different virtual currencies or intervene in any way in the realization of said operations, or provide services for safeguarding private cryptographic keys and to maintain, store and transfer virtual currencies (ii) those who make initial offers of new virtual currencies (called ICOs), with respect to those that they deliver in exchange of other virtual currencies or legal tender. Spanish taxpayers will have the obligation to report on cryptocurrencies located abroad of which they are the owner, or in respect of which they have the status of beneficiary or authorized or otherwise held power of disposal, guarded by persons or entities that provide services to safeguard private cryptographic keys on behalf of third parties, to maintain, store and transfer virtual currencies. This obligation will extend to those who have the consideration of beneficial owners in accordance with the provisions of the section 2 of article 4 of Law 10/2010, of April 28, on the prevention of money laundering and the financing of terrorism. Among other exceptions, this obligation will be excused as long as the overall balance in cryptocurrencies doesn´t exceed 50.000 euros.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	There is a draft bill to implement DAC8 in Spain before January 1st, 2026
7. If "yes", is there an indication on the implementation and reporting timeline?	It is foreseen that DAC 8 will be in force as from January 1st, 2026
8. Are there/do you expect there to be any deviations from the OECD framework?	DAC 8 is aligned with the OECD framework
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

Spain (3 of 8)

Direct Tax (3 of 3)

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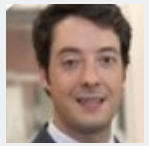

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Spain (4 of 8)

Indirect Tax (1 of 5)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	There is not a guidance, nor particular regulation, on the VAT treatment for cryptocurrencies. Up to the moment, in Spain, it is the Spanish General Directorate of Taxation ("SGDT") who is interpreting through Binding Tax Rulings what is the VAT treatment to be applied for income accrued from this kind of assets. Note that the EU Markets in Crypto-Assets Regulation (MiCA), establishing a common framework for crypto-assets and related services across all EU territories will be fully in force up from the following 30 December 2024, so Spain will be also affected by the common Regulation contained there for definitions of products/services as tokens or other crypto´ different from NFTs, who are in principle excluded.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	According to article 1.5 of Spanish Law 10/2010 on anti-money laundering and terrorism financing, "virtual currencies" are defined as digital representations of value that are neither issued, nor guaranteed by a central bank or public authority, not necessarily associated with a legally established currency and that do not have the legal status of currency or money, but are accepted as an exchange consideration and could be electronically transferred, stored or traded. For VAT purposes, according to the Judgement of the ECJ C-264/14, "Skatteverket v David Hedqvist", cryptocurrencies are identified as currencies as such, used as a payment method in consideration exchange. Based on this definition, the SGDT has analyzed the VAT treatment that should be given to different activities related with cryptocurrencies in Binding Tax Rulings as V2034-18, of July 9, 2018. In connection with all financial and trading (over the counter) services, and intermediation in those one, linked to cryptoassets, the SGDT (in the mentioned ruling and others as V3513-19 of December 20, 2019 or V2679-21, of November 5, 2021) considers that these one should be treated as subject but exempt from VAT under Article 20.One.18º of Spanish VAT Law.

Spain (5 of 8)

Indirect Tax (2 of 5)

Question	Response
2. If "yes", what is the position for GST / VAT / ESS or equivalent? (cont'd)	However, in relation to the safekeeping of cryptocurrencies through a platform not connected to the Internet (so-called "cold wallet"), the SGDT considers that its treatment should be similar to the rental of deposits and, thus, subject and not exempt from VAT. In the same line has pronounced the SGDT in the Binding Tax Ruling V1657-22, of July 8, 2022 for the management and advisory along the purchase and sale of cryptocurrencies, that are subject and not exempt from VAT assimilating the treatment to the discretionary investment management services. As further explained in question 5 below, the approach of the SGDT has not changed as from its Binding rulings as V1748-18 of June 18, 2018, V2670-18 of October 2, 2018, V1274-20 of May 6, 2020 or V2407-23 of September 7, 2023, for the mining or mere cryptocurrency exchange services (or cryptocurrency exchanging as means of payment), which are expressly disregarded or not subject to VAT. More recently, in the ruling V0078-24 of February 15, 2024, the SGDT considered that a fungible token (underlying by gold and silver) may be considered as a supply of goods because the token represents actual gold or silver - tangible - and owning the token gives you the right to access for the physical gold or silver. In 2024, the SGDT has also pronounced that a content creator using tokens accessing to videogames ("utility" token) are subject to VAT at standard VAT rate at 21% if they deemed taxed in the Spanish VAT territory, as kind of ESS and cannot be treated as electronic currencies or vouchers.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	There is not a definition in the VAT Law about the NFTs and it is the SGDT who has defined its nature for tax purposes. In Binding Tax Rulings V0486-22, of March 10, 2022 and V2274-22 of October 10, 2022, NFTs are defined as digital certificates that, through blockchain technology, are associated with a single digital file. Therefore, NFTs are single digital assets that cannot be exchanged with each other -each one is different to the others-, and whose underlying asset can be anything that can be digitally represented such as an image, a graphic, a video, music or any other digital content, even a piece of art.

Spain (6 of 8)

Indirect Tax (3 of 5)

Question	Response
4. Treatment of NFTs sold in exchange for cryptocurrency?	NFTs are not considered as cryptocurrencies according to the doctrine stated by the SGDT (confirmed in the recent Binding Tax Ruling V1753-23, of June 15, 2023), as long as they are not configured as currencies nor fungible goods. In accordance with the above, the sale of a NFT in exchange for cryptocurrency, that has been transformed to be considered as a single and original digital asset, should be included within the nature of electronically supplied services, subject and not exempt from VAT. According to the ECJ and SGDT, cryptocurrencies are treated as normal currencies as such, so the VAT treatment should be the same as the payment through any other method.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes. The SGDT has analyzed some other services related with cryptocurrencies, excluded from the VAT taxation (Binding Tax Ruling V2679-21, of November 5, 2021). Firstly, as anticipated above, it should be noted that crypto mining services do not imply a service in which two parties have an economic relationship, as the new cryptos are generated by the network automatically. Therefore, these transactions would be treated as out of scope of VAT. In the case of the income obtained by holders of cryptocurrencies by staking, this constitutes a transaction subject but exempt from VAT since such income comes from crypto stocked in a “wallet” with non-disposal of the assets. Notwithstanding this, the “smart contract” staking, which allows users to participate in staking operations without an intermediary, is not considered by the SGDT as a financial activity, due to the direct disposal of assets, being treated as subject and not exempt from Spanish VAT.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	There is not definition as such, but it may be understood as any marketplace that is operated by electronic means through which a person (the underlying supplier) makes a supply of goods or remote services, by electronic means, through another person (the operator of the marketplace) to a third person (the recipient).

Spain (7 of 8)

Indirect Tax (4 of 5)

Question	Response
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	According to the mentioned Binding Tax Rulings as the V486-22, it depends on the condition in which the platform is acting. In case acting with an undisclosed agent role, the intermediary marketplace would have the obligation to account for VAT. Simply note here that this undisclosed role of the marketplace would be presumed in case the recipient cannot be known by the supplier of the ESS for the purposes of compliance with its tax obligations.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Not at this stage. The guidance is proposed by the SGDT. In Binding Tax Ruling V1753-23, of June 15, 2023 the SGDT considers that tokens, as digital certificates, have different nature from the underlying real-world assets. In particular: “appear to be two digital assets with their own entity (…) the underlying digital file and the “non-fungible token” or NFT that would represent the digital property of the underlying asset”.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage. According to the latest update about MiCA, De-Fi (decentralized finance) and NFTs (non-fungible tokens) are to be excluded from the European Regulation. In fact the close entry into force in general seems to confirm this point.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Note that there are not reporting obligations as such in Spain for crypto-assets related exclusively to indirect taxation. It is true that those supplies/services related to it should be reported in real-time filings for VAT invoicing Ledgers (so-called “SII”), but this is as in any other transaction to be reportable on this system. In addition, EU CESOP Directive implemented in the Spanish VAT legislation may be applicable to PSPs in international payment services where crypto may be exchanged and Spain would be the territory of supply/reception. Not related with indirect taxation as such but note that in 2024 the Spanish Government implemented the DAC8 EU Directive with certain information obligations for cryptocurrencies suppliers.

Spain (8 of 8)

Indirect Tax (5 of 5)

Question	Response
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes? (cont'd)	And, also, the Spanish CNMV (Stock Market Commission in Spain) published a form to be filed by those entities affected by MiCA activities in order to recover information and subsequently starting authorization procedure.

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Sweden (1 of 6)

Direct Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes, guidance only.
2. If "yes", what is the scope of taxability?	The Swedish Tax Agency ("STA") has issued general guidance on how crypto is taxed and how to declare income from crypto. The STA has also released some official opinions on the following subjects: • Taxation of mining of bitcoin and other virtual currencies. • Taxation when transferring crypto-assets to a platform for lending, trading and custody. The guidance and official opinions from the STA are addressed to individuals and written from a capital income perspective. According to the Supreme Administrative Court of Sweden ("SAC"), bitcoin does not qualify as shares, securities or foreign currency. Instead, bitcoin should be taxed according to the rules on "other assets". While the SAC's verdict applied to bitcoin, we assume that most cryptocurrencies should be treated as "other income" as well. The STA has issued guidance as to which events involving crypto-assets are deemed to be taxable. While the guidance specifies bitcoin, it can be assumed that the guidance applies to other types of cryptocurrencies. The following situations are inter alia commented by the STA: • Payment of goods and services using bitcoin is seen as a trade and is therefore subject to capital gains taxation. • Lending of bitcoin, assuming that the lendee has a right to sell, or otherwise freely dispose of the asset, is deemed to be a sale for the lender. • Transfer of crypto to a liquidity pool in exchange for a receivable (token) which gives a right to a future withdrawal of assets from the pool, is seen as a trade (capital gains taxation). • Transfer of crypto to a custodian or pledging the crypto-asset against a commitment is not a taxable event.

Sweden (2 of 6)

Direct Tax (2 of 4)

Question	Response
2. If "yes", what is the scope of taxability? (cont'd)	• For individuals, mining of bitcoin is taxed as salary income, and in some cases as business income (if certain criteria are fulfilled). • Sale of bitcoin and other cryptocurrencies are subject to capital gains taxation. • Staking of ether in Ethereum 2.0 should not be subject to tax. From April 2023, it is possible to withdraw both deposited ether and yield. The yield is subject to tax at the point of time when ether is available for withdrawal. • Exchange of one cryptocurrency for one or several other cryptocurrencies. • Exchange of one cryptocurrency for a FIAT currency. • The use of cryptocurrency as a stake in gambling. When calculating the capital gain, the average method should be used when determining the acquisition value. I.e. the acquisition cost of all the purchased bitcoins is added together, and then divided by the number of bitcoins. In case of divestment of bitcoin, the average acquisition cost is used in determining potential capital gain or loss. This means that the acquisition cost pertaining to the number of sold bitcoins will reduce the total acquisition cost and then be divided by the number of the remaining bitcoins. The capital gains taxation is to be determined separately for each cryptocurrency of the same kind. The aforementioned means that the calculation of the average acquisition cost should be done separately for e.g. Bitcoin, Ethereum and Ripple. The average method is generally not to be used in case of non-fungible tokens ("NFTs"). Certain crypto-assets, such as NFTs, can, depending on their use, be treated as personal assets. For such crypto-assets, the acquisition cost in the capital gains calculation can be estimated at 25 percent of the received compensation. However, bitcoin and similar crypto-assets are not deemed to be personal assets and are, therefore, not covered by the current standard rule as explained above (see SAC's judgment in HFD 2018 ref. 72). When mining bitcoin, the acquisition cost will be the market value of the bitcoin at the time of the completed mining (for the purposes of capital gains taxation). If bitcoin is mined by an individual, the market value at the time of the completed mining will be treated as salary or business income, depending on the factual circumstances.

Sweden (3 of 6)

Direct Tax (3 of 4)

Question	Response
3. What are the direct tax implications?	**Individuals** • If subject to capital gains taxation, 30% tax will apply to the gain. Losses are only deductible up to 70%. Gains on personal assets up to SEK 50,000 in total are tax exempt, and losses from the disposal of personal assets may not, however, be deducted. • If treated as salary/business income, subject to progressive tax rate depending on annual salary/business income and where the individual lives (municipality tax). Tax rate varies between approx. ~29% to ~56%). **Corporates (limited liability companies)** • Subject to corporate income tax, currently 20.6%.
4. Are there any other relevant/noteworthy tax considerations?	More detailed information and guidelines can be found on the STA's website "Rättslig vägledning".
5. What are the tax compliance/ reporting requirements?	Income from the sale (or other events treated as a sale for tax purposes) must be included in the individual's/company's income tax return. The Council Directive (EU) 2023/2226 of 17 October 2023 amending Directive 2011/16/EU on administrative cooperation in the field of taxation ("DAC8") was adopted by the EU on 17 October 2023. DAC8 obliges crypto-asset service providers and crypto-asset operators to report EU customers' exchange transactions and transfers of crypto-assets. In Sweden, the rules are planned to be implemented in domestic legislation as from 1 January 2026.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Not any guidance from the STA. However, the Government has presented a legislative proposal to implement DAC8 and CARF in Swedish law. The STA has also proposed in a memorandum (dated 2024-06-10) to the Swedish Ministry of Finance that a review of the possibilities to simplify the rules for the taxation of crypto-assets should be conducted. This is due to the fact that the developments within the OECD and EU, particularly through the Crypto-Asset Reporting Framework ("CARF") and DAC8, will lead to increased international information exchange on crypto transactions and, thus, reveal a much larger number of taxable transactions in Sweden than is currently the case

Sweden (4 of 6)

Direct Tax (4 of 4)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	The purpose of such a review, as requested by the STA (see section 6 above), is to investigate how the mentioned rules can be made less complicated to facilitate the taxpayer's ability to report their transactions with crypto-assets correctly and thereby reduce the administrative burden for both the taxpayer and the STA. It is not known whether the Ministry of Finance has initiated any review in this regard. DAC8 is to be implemented into Swedish legislation by 1 January 2026. Sweden and a number of other countries have on 10 November 2023 signed a declaration of intent to work towards implementing the OECD's CARF and to implement the OECD's updated standard for information exchange on financial accounts ("CRS") covering e-money. The purpose of the mentioned declaration is to ensure that there are functioning exchange agreements in place in time so that the first exchanges under both the CARF and the amended CRS can commence in 2027, subject to applicable national legislative procedures.
8. Are there/do you expect there to be any deviations from the OECD framework?	No major deviations from the OECD framework.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Sweden (5 of 6)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Pursuant to EU and local Swedish case law, the Swedish Tax Authority guidance posits that the sale or intermediation of cryptocurrency (Bitcoin or equivalent) should fall within the application of the VAT exemption for currency congruent to art 2.1 C of the VAT directive and chapter 10, section 34 of the Swedish VAT act (Sw: mervärdesskattelag [2023:200).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Yes, NFTs are subject to the standard VAT rate of 25 %.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Subject to 25 % VAT.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	It is presumed that if an NFT is sold or bought through a marketplace, which constitute an electronic service, that the marketplace, if acting in its own name, is the buyer or seller of the electronic service. Thus the presumption indicates that the taxable person who supplies the marketsplace is obligated to account for VAT on the sale of the NFT.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No, there is guidance on when an NFT refers or combines a digital work and that it cannot be covered/deemed to be a IP-protected work, i.e. it is subject to the standard VAT rate of 25 %.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

Sweden (6 of 6)

Indirect Tax (2 of 2)

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Switzerland (1 of 5)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	The Federal Tax Authorities have issued guidance regarding the taxation of crypto assets. This guidance covers a categorization of tokens (native token, utility token, asset backed token) and how they are treated from a Swiss tax perspective. Specifically, the guideline covers (amongst others) the taxation of ICOs, payments made to token holders, taxation of staking/airdrops, trading of tokens as intermediary, taxation of individuals holding crypto assets and the allocation of token to employees as part of the compensation. Tax administrations generally are friendly towards the crypto industry and open for discussions. It is possible to file a tax ruling in Switzerland to get the expected tax consequences confirmed.
2. If "yes", what is the scope of taxability?	Switzerland does not have any specific laws in place regarding the taxation of cryptocurrencies. The existing tax law is applicable to the crypto industry. Generally, to be considered are direct taxes (such as income taxes and wealth/capital tax) and withholding tax, stamp duty and value added tax.
3. What are the direct tax implications?	**Corporate Tax** Capital gains on the sale of tokens as well as income from staking and mining activities are subject to corporate income tax at the ordinary income tax rates. The effective corporate income tax rate for federal, cantonal and communal taxes is between 11.85% and 20.54%, depending on the canton and commune where the company is domiciled. The taxable equity (including token holdings) is subject to annual capital tax on a cantonal and communal level. The effective capital tax rate is between 0.001% and 0.50%, depending on the canton and commune where the company is domiciled. **Individual Tax** Private capital gains on moveable assets (e.g. shares / tokens) normally are not subject to income tax in Switzerland as long as an individual does not qualify as a professional securities dealer. All gross remunerations from employment, whether in cash or token, is subject to taxation at the time the employee received the renumeration or received an irrevocable right to the remuneration. It is irrelevant whether the remuneration results from Swiss or foreign employment. All cantons levy a net wealth tax based on the balance of the worldwide gross assets (including token holdings) minus liabilities.

Switzerland (2 of 5)

Direct Tax (2 of 3)

Question	Response
4. Are there any other relevant/noteworthy tax considerations?	**Taxability of income from ICO** The proceeds of an ICO are generally subject to income tax at the level of the Swiss issuer. However, it may be possible to build a provision in the corresponding amount, if certain conditions are fulfilled. **Withholding tax** Distributions to investors of native token and utility token generally are not subject to Swiss withholding tax. Payments on debt tokens qualify as interest payments and are subject to 35% withholding tax. For equity and participation tokens, a case-by-case analysis has to be made (safe harbor rules available). **Stamp duty** Generally, native token, utility token, and asset token without participation rights (as defined by the Swiss Federal Tax Authorities) do not qualify as taxable securities for transfer stamp tax purposes. However, debt token and asset-backed token with participation rights or whose underlying is a taxable security (such as a share, bond etc.) qualify as taxable securities and are therefore subject to transfer stamp tax at 0.15% (Swiss/Liechtenstein securities) or 0.3% (foreign securities), provided that a Swiss securities dealer is involved in the transaction. Issuance stamp tax generally is not due if tokens are issued, except the token would contain participation rights in the company issuing the token.
5. What are the tax compliance/ reporting requirements?	The general Swiss tax filing requirements are applicable. Companies domiciled in Switzerland have to file an annual corporate tax return. Additionally, a company may have to file withholding tax forms, stamp duty declarations, value added tax declarations etc. Individuals tax resident in Switzerland have to file an annual income tax return.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	In its autumn session of 2025, the Federal Assembly adopted the multilateral agreement and corresponding national implementing CARF regulations. However, in early November 2025, economic commission of the council of state deferred the approval of the activation of the exchange with 74 member states. Based on this decision, its assumed that the implementation of CARF will most likely be deferred until 1 January 2027 (no official confirmation yet).

Switzerland (3 of 5)

Direct Tax (3 of 3)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	Please refer to the prior question.
8. Are there/do you expect there to be any deviations from the OECD framework?	No significant deviations from the OECD framework are expected.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No.

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Switzerland (4 of 5)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	It depends on the qualification of the token between: • Payment token (PT); • Utility token (UT); • Security (asset backed) token (ST) Hybrid token might embed functions from the above categories. Moreover, the VAT treatment also depends on the supply related to the crypto itself. For example: • Sale and acquisition of token : PT: Not relevant from a VAT perspective UT: Taxable at the place of recipient ST: Exempt without credit • Trading fees: PT: Exempt without credit UT: Taxable at the place of recipient ST: Exempt without credit Please note that the SFTA is reviewing and remodeling its practice at the moment (December 2024). Changes are to be expected.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No definition. It is not defined as to whether NFT will be treated as ESS
4. Treatment of NFTs sold in exchange for cryptocurrency?	If sold against PT: it will be considered as a taxable transaction. If sold against UT or ST: it will be considered as a barter transaction. The VAT implication on the cryptocurrency leg (as payment) will have to be analysed in each specific case.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes, but it depends on the qualification of the crypto and the services. For example trading fees related to payment tokens are exempt without credit.

Switzerland (5 of 5)

Indirect Tax (2 of 2)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, but this is not a specific definition for NFT's or crypto's marketplace.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Not clear, but assuming that the marketplace appears as the provider vis-à-vis the third party (buyer), the marketplace likely may have to account for VAT. As from 1 January 2025, the marketplace might also have some obligations to provide information to the SFTA (pure reporting information) on the Swiss related supplies
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No other rule than potentially the rules applicable for security (asset backed) token.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No however in practice we observe consistent approach and tendency on how to treat De-Fi activities.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Taiwan (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	There is no guidance or income tax laws on cryptocurrency except for the security tokens issued under the specific rule issued by Financial Supervisory Committee (“FSC”) and Taiwan Securities Exchange. The tokens issued under such specific rule would therefore be viewed as “securities”. The trade of such security token would be subject to securities transaction tax (“STT”) and the capital gain would be exempt from income tax. In 2022, after the bankruptcy announcement of FTX, the Ministry of Finance (MoF) issued a press release to address the deductibility of losses on cryptocurrency investments for investors. For profit-seeking enterprise investors, income/loss from the exchange of cryptocurrency to fiat or exchange between cryptocurrencies is deemed as income/loss from property transactions and would be subject to income tax under Article 24 of the Income Tax Act; for individual investors, it is also deemed as income/loss from property transactions if the transactions are not regularly conducted for a trading purpose. The press release only identifies the type of income derived from the exchange of cryptocurrencies and provides a general rule on calculating the income/loss from property transactions, but no further details are provided. In 2024, responding to the volatility and price spikes in the cryptocurrency market, Taiwan's tax authorities committed to drafting guidance on taxing income from cryptocurrency transactions. Additionally, they have been urged to develop strategies for collecting data from cryptocurrency platforms to ensure accurate tax reporting and compliance.
2. If “yes”, what is the scope of taxability?	No guidance.
3. What are the direct tax implications?	No guidance.
4. Are there any other relevant/noteworthy tax considerations?	No guidance.
5. What are the tax compliance/ reporting requirements?	No guidance.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	There is no announcement, consultation, or guidance regarding a crypto asset reporting framework or equivalent. Having mentioned that, the tax authorities have been urged to develop strategies for collecting data from cryptocurrency platforms to ensure accurate tax reporting and compliance.

Taiwan (2 of 4)

Direct Tax (2 of 2)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	No guidance.
8. Are there/do you expect there to be any deviations from the OECD framework?	No guidance.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	No guidance.

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Taiwan (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Although the Ministry of Finance (MoF) issued a press release stating that the income/loss from the exchange of cryptocurrency to fiat or exchange between cryptocurrencies is deemed as income/loss from property transactions from a direct tax perspective, there is no guidance or GST/VAT laws on how the cryptocurrency trades/exchanges should be taxed other than security tokens issued under the specific rules issued by Financial Supervisory Committee ("FSC") and Taiwan Securities Exchange. In 2019, the FSC and Taiwan Securities Exchange have announced the regulations for security tokens ("ST Rules"). Tokens issued in Taiwan in accordance with the ST Rules would therefore be viewed as "securities". The trade of such a security token would not be subject to GST/VAT but subject to security transaction tax ("STT")
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	No guidance.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No guidance.
4. Treatment of NFTs sold in exchange for cryptocurrency?	No guidance.
5. Are there any other applicable exemptions relating to cryptoassets?	No guidance.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No guidance.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	No guidance.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No guidance.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No guidance.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No guidance.

Taiwan (4 of 4)

Indirect Tax (2 of 2)

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Thailand (1 of 7)

Direct Tax (1 of 4)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes – In May 2018, Thailand's Revenue Code was amended to include assessable income derived from • share of profits or any benefits of a similar nature derived from holding or possessing digital tokens; and • benefits derived from the transfer of cryptocurrency or digital tokens which exceeds the cost of the investment; as well as withholding tax to be deducted by payers on the two types of income above (subject to types of recipient of income). Furthermore, in January of 2022, Thailand's Revenue Department issued a manual for taxpayers outlining its guidance on cryptocurrency as it relates to five main sources of income: • Employment income in the form of cryptocurrency and digital tokens, • Income derived from trading cryptocurrency and digital tokens, • Mining income, • Staking income, and • Gifts or other benefits in the form of cryptocurrency and digital tokens. In March of 2022, Thailand issued ministerial regulation to govern capital losses from cryptocurrency and digital tokens for personal income tax purposes. In September of 2025, Thailand issued ministerial regulation to exempt personal income tax on capital gains from digital assets between 1 January 2025 and 31 December 2029 This applies under the condition that the capital gains are derived from trading digital assets, including cryptocurrencies and digital tokens, through legally licensed businesses including exchanges, brokers and dealers.
2. If "yes", what is the scope of taxability?	In 2018, Thailand enacted the Royal Decree on Digital Asset Businesses, which sets definitions for both terms as follows:

Thailand (2 of 7)

Direct Tax (2 of 4)

Question	Response
2. If "yes", what is the scope of taxability? (cont'd)	**Definition of cryptocurrency** means electronic data units that have been created on an electronic system or network with the intention of being used as a medium of exchange for goods, services, any other rights, or to trade other digital assets. The definition also includes any other electronic data units as prescribed by Thailand's Securities and Exchange Commission ('SEC'). **Definition of Digital token** means electronic data units that have been created on an electronic system or network with the intention to; • Determine the rights of an individual to participate in certain investment projects or undertakings; • Determine the rights to acquire goods and services, or other specific rights as agreed upon between the issuer and the holder of the token. This meaning shall cover any right as prescribed by the Securities and Exchange Commission. Relying on these definitions, the scope of the taxation in Thailand based on the amendment to the Revenue Code where the two additional categories of income have been included remains quite broad. Additionally, in 2023, Thailand enacted a new Royal Decree issued under the Revenue Code to exempt income tax for the transfer of investment tokens, and within provided the **definition of Investment token** to mean a digital token with the objective of specifying the right of a person in making joint investment in a project or any business under the law governing digital asset business.
3. What are the direct tax implications?	From a Thai tax perspective, cryptocurrencies and digital tokens are treated as properties and thus are to be assessed based on the current trading value at each transaction. Any gains or benefits derived from cryptocurrencies or digital tokens are assessable income subject to tax normally. It should be noted that per the guidance from the Revenue Department, cryptocurrency or digital tokens received from mining activities are not taxable until the point in which the cryptocurrency or digital token is disposed of; however, no legislative or regulatory updates have codified this.

Thailand (3 of 7)

Direct Tax (3 of 4)

Question	Response
3. What are the direct tax implications? (cont'd)	In 2023, Thailand enacted a new Royal Decree Issued under Revenue Code into force with retroactive effect which exempts income tax arising on the transfer of Investment tokens from 14th May 2018 onwards. Income or value on the transfer of investment tokens issued outside the parameters of the law governing digital asset businesses would not qualify for the exemption In 2024, Thailand enacted a new Royal Decree under the Revenue Code, providing an exemption for profit sharing or any benefits of a similar nature derived by individuals from holding or possessing investment tokens, applicable to profit sharing or benefits received from 1 January 2024 onwards. This exemption is valid provided that the taxpayer does not claim a refund or credit for the withheld tax, which is set at 15%.
4. Are there any other relevant/noteworthy tax considerations?	**Valuation:** Thailand's existing regulatory framework on cryptocurrency and digital tokens require taxpayers to assess the value of income or benefits derived from cryptocurrencies or digital tokens using prices prescribed on digital asset exchanges permitted under the law governing digital asset business operation in Thailand. There is no specific guidance on digital assets which may not be commonly traded or traded in large volumes that taxpayers, such as for NFTs or unlisted tokens or specifically that touches on trading of digital assets on exchanges not governed under Thai law. **Withholding tax:** In 2018, the Revenue Code was amended to include withholding tax at the rate of 15% to be deducted by payers on payments made to individuals or non-residents who earn profits or benefits from holding or possessing digital tokens and gains from the transfer of cryptocurrency or digital tokens.
5. What are the tax compliance/ reporting requirements?	Taxpayers who derive all types of all assessable income from cryptocurrencies or digital currencies must include the income or benefit as part of their annual tax return filing. In addition, individual taxpayers who derive income from selling of cryptocurrency that is mined, receiving cryptocurrency or digital tokens as gifts or rewards, and other benefits from the possession of cryptocurrencies such as from staking, will need to file half year tax returns.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No, but as of now, Thailand has committed to undertaking the exchange of information under CARF by 2028.

Thailand (4 of 7)

Direct Tax (3 of 4)

Question	Response
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Thailand (5 of 7)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes – On May 24, 2022, two Royal Decrees were enacted into force in Thailand with retroactive effect to transactions from 1 April 2022 to exempt Value Added Tax (VAT) on • the transfer of cryptocurrencies or digital tokens in the digital asset exchanges approved by the Securities and Exchange Commission of Thailand; and • the transfer of cryptocurrencies, specifically the Retail Central Bank Digital Currency or Retail CBDC, issued by the Bank of Thailand. The exemption is to apply until December 31, 2023. Additionally, on August 23, 2023, Thailand enacted a new Royal Decree Issued under Revenue Code into force with retroactive effect which exempts Valued Added Tax arising on the transfer of Investment tokens from 14th May 2018 onwards
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Relying solely on the definitions of cryptocurrency and digital tokens from the Royal Decree on Digital Asset Businesses, cryptocurrencies and digital tokens fall under the definition of "goods" under the definition of goods in the Revenue Code as a corporeal or incorporeal property susceptible of having a value and of being appropriated whether or not for sale, use or any purposes. As such, the enactment of the two Royal Decrees in 2022 provides an exemption for the transfer of cryptocurrencies and digital tokens; however, specifically limits the exemption to the transfer on digital asset exchanges approved by Thailand's SEC. Taxpayers who transfer on other platforms or exchanges would not qualify for the exemption but would have to assess whether they would be subject to the 7% VAT or 0% VAT whereby the transfer of cryptocurrency or digital token can be regarded as export. The new Royal Decree enacted in 2023 further provides an exemption to the transfer of investment tokens, which relies on the definition of investment token, that would be limited to investment tokens only offered to the public under the law governing digital asset business. Transfers of investment tokens that are issued outside the parameters of this law would not qualify for the exemption. In 2024, Thailand enacted a new Royal Decree issued under the Revenue code to exempt VAT for the transfer of cryptocurrency or utility tokens carried out at a digital asset exchange or through a digital asset broker and transfer by or to a digital asset dealer under the law governing digital asset business.

Thailand (6 of 7)

Indirect Tax (2 of 3)

Question	Response
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Generally, yes as the supply of a NFT would similarly be considered the supply of an “intangible personal property” for VAT purposes. However, if the transfer of NFTs is under exchanges approved by Thailand’s SEC, the transfer of the NFT itself may be exempt. However, NFTs representing an underlying service or goods as well should be properly assessed as the underlying service or goods supplied would not qualify for VAT exemption.
5. Are there any other applicable exemptions relating to cryptoassets?	No.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	No.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	In 2021, a regulation was issued requiring providers of electronic services to recipients who are non-VAT registrants to register for and pay VAT in Thailand. The regulation came into effect as of September 2021. If a service provider in Thailand has provided electronic services through an electronic platform that has been registered in Thailand, the service provider will be responsible for paying the VAT; however, where a service provider outside of Thailand has provided electronic services through an electronic platform, then the platform will be responsible for the Thai VAT, regardless of whether the platform is Thai. If a foreign platform is responsible for paying the VAT, it would need to register for VAT in Thailand. Though the regulation makes no reference to the application of cryptocurrency and digital tokens, if a token such as an NFT is linked to the provision of electronic services, then the same may need to be considered for NFT platforms and marketplaces.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.

Thailand (7 of 7)

Indirect Tax (3 of 3)

Question	Response
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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Turkey (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Currently, there is no regulatory guidance available in Turkey on the classification of cryptoassets and/or VAT treatment on sale of such assets.
2. If “yes”, what is the scope of taxability?	While no formal legislation is in place yet, this is an area of attention for the Ministry and it is expected that more formal legislation will follow, including defining digital assets for tax purposes and providing guidance on the scope of taxability. It is expected that such assets will likely be defined as "intangible assets" for tax purposes. Thus, gains from their disposals shall thus be considered as "capital gains", in principle subject to annual income tax declaration and shall be taxed at standard progressive income tax rates. The term 'disposal shall probably include exchange of a virtual currency for fiat currency, exchange of a virtual currency for other virtual currencies or crypto-assets, or exchange of a virtual currency in payment for goods and services, or wages. Yet transfers of a virtual currency from the wallet of a person to another wallet the same person is the beneficial owner shall not be considered as disposal giving rise to a taxable event. (However, for trades made through domestic platforms, the Ministry is considering imposing a different tax treatment, whereby the gains shall be taxed through a withholding (the rate of which is yet to be determined) to be applied by the platforms, which shall be the final income taxation, meaning that investors shall not need to include such gains in their income tax returns. Alternative option of the Ministry is imposing a special transaction tax in lieu of income taxation/withholding. Yet these (withholding taxation/transaction tax) are only thought for purchases and sales made through platforms operating in Turkey. Not for non-residents.
3. What are the direct tax implications?	No guidance yet.
4. Are there any other relevant/noteworthy tax considerations?	Under the current domestic law and most of the double tax treaties signed by Turkey (which are normally based on the OECD model) commissions/trading fees and such alike of non-residents are treated as business profit and are subject to income taxation in Turkey only in case they have a permanent establishment (“PE”) in Turkey. There is no clear rule for the digital PE concept. Lately, we have observed that the Turkish tax inspectors have started to focus on this and scrutinize digital service platforms on the grounds that they have digital PEs and there are ongoing court cases for which no clear precedent has been established yet.

Turkey (2 of 4)

Direct Tax (2 of 2)

Question	Response
5. What are the tax compliance/ reporting requirements?	The Ministry seems to be planning to impose certain reporting requirements on the platforms the details of which are yet to be determined. However, we expect such reporting requirements to be brought for domestically operating platforms, not non-residents. If a non-resident entity provides services within the scope of VAT-3 mechanism (mentioned above) for both non-taxpayer individuals in TR (B2C) and resident taxpayer companies in TR (B2B), it is obliged to declare B2B electronic service sales invoices monthly in an XML formatted list There are not currently any reporting requirements with respect to proceeds/volume of the transactions. The required reporting just includes information of the issued B2B invoices (e.g. date, invoice number, TAX ID of the seller and buyer, invoice amount, etc.).
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No guidance yet.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Turkey (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	As for VAT purposes, currently, there is no regulatory guidance. The prevailing market view is that exchanges of virtual currencies for fiat currency or other virtual currencies, should not be treated as VAT event (unlike the commission charges of platforms operating in Turkey, which are subject to 20% VAT). It is expected that the Ministry is to propose a specific VAT exemption to be brought into the VAT law.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not yet.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Yes, standard rated at 20% (domestic transactions).
5. Are there any other applicable exemptions relating to cryptoassets?	Not yet.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not yet.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Marketplace is only responsible for VAT to be calculated on its revenues obtained from exchange commissions and the sale of its own crypto assets. Marketplaces are not responsible for VAT withholding. (In other words, there is no reverse charge VAT obligation yet)
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Such guidance has not yet been created or published.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Such guidance has not yet been created or published.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Such guidance has not yet been created or published.

Turkey (4 of 4)

Indirect Tax (2 of 2)

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Ukraine (1 of 2)

Direct Tax

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	No. There is a draft law, which has passed the first consideration in the Parliament, but it has not been adopted yet. No clear deadlines are available on when/ whether it might be adopted.
2. If "yes", what is the scope of taxability?	Not applicable.
3. What are the direct tax implications?	Not applicable.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Not applicable.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	No. Certain consultations are available only with regard to the tax implications arising for individuals.
7. If "yes", is there an indication on the implementation and reporting timeline?	Not applicable.
8. Are there/do you expect there to be any deviations from the OECD framework?	Not applicable.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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Ukraine (2 of 2)

Indirect Tax

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	No.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Not applicable.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	Not specifically. NFT's can potentially be treated as intangible assets or services (including electronically supplied services, further – "ESS").
4. Treatment of NFTs sold in exchange for cryptocurrency?	Not defined.
5. Are there any other applicable exemptions relating to cryptoassets?	Not applicable.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Not applicable.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	If treated as ESS, the obligation to account for VAT depends falls on the supplier of record (mentioned in the invoice).
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No.

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United Arab Emirates (1 of 4)

Direct Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	On 9 December 2022 the Ministry of Finance of the United Arab Emirates ("UAE") announced the introduction of a Federal Corporate Tax system, effective for the financial years commencing on or after 1 June 2023. There are no specific provisions in the UAE Corporate tax Law in respect of cryptocurrency and businesses engaged in trading cryptocurrency may be subject to UAE Corporate tax.
2. If "yes", what is the scope of taxability?	The UAE Corporate tax regime aligns Taxable Income to Accounting Income (i.e. accounting net profit or loss in accordance with IFRS). The Corporate tax Law prescribes certain adjustments to Accounting Income in order to compute Taxable Income but none relate specifically to Cryptocurrency.
3. What are the direct tax implications?	Any Taxable Income in excess of AED375,000 will be subject to Corporate Tax at 9%. A Qualifying Free Zone Person could qualify for a 0% Corporate Tax rate on Qualifying Income as defined in the legislation.
4. Are there any other relevant/noteworthy tax considerations?	Not applicable.
5. What are the tax compliance/ reporting requirements?	Filing an annual Income tax return and making the required payment of any Corporate tax due within 9 months after the end of the relevant financial year.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	On 21 July 2025, the UAE Ministry of Finance ("MoF") signed the Multilateral Competent Authority Agreement ("MCAA") on the Automatic Exchange of Information under the CARF, following its announcement of its intention to implement the framework.
7. If "yes", is there an indication on the implementation and reporting timeline?	CARF implementation in the UAE is scheduled to go-live in 2027, with the first exchanges of information expected in 2028.
8. Are there/do you expect there to be any deviations from the OECD framework?	Unknown.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	To be determined (once the draft / final legislation is published) .

United Arab Emirates (2 of 4)

Direct Tax

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United Arab Emirates (3 of 4)

Indirect Tax (1 of 2)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	The UAE Federal Tax Authority (FTA) issued Public Clarification VATP040, providing interpretive guidance on the definition and VAT treatment of specific transactions involving Virtual Assets, as introduced by Cabinet Decision No. 100 of 2024, which amended the Executive Regulation of Federal Decree-Law No. 8 of 2017 on Value Added Tax.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	Virtual Assets are defined as a "digital representation of value that can be digitally traded or converted and used for investment purposes, excluding digital representations of fiat currencies or financial securities." Under Article 42 of the amended UAE VAT Executive Regulations, the following activities are either VAT-exempt (when supplied to UAE-based customers or businesses) or zero-rated (when supplied to customers outside the UAE), provided they are not performed in exchange for an explicit fee, discount, commission, rebate, or similar consideration: • Transfer of ownership of Virtual Assets, including virtual currencies; • Conversion of Virtual Assets; • Custody, management, and facilitation of control over Virtual Assets; • Agreements to perform or arrange any of the above activities, excluding advisory services.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	The UAE VAT Executive Regulations reiterate the definition of 'Virtual Assets' as "digital representation of value that can be digitally traded or converted and used for investment purposes, excluding digital representations of fiat currencies or financial securities."
4. Treatment of NFTs sold in exchange for cryptocurrency?	It remains uncertain whether NFTs fall within this definition. Further clarification from the FTA is awaited.
5. Are there any other applicable exemptions relating to cryptoassets?	Yes, the transfer and conversion of Virtual Assets have been VAT-exempt since 1 January 2018. Custody and management of Virtual Assets are also exempt, provided they are not rendered for an explicit fee, discount, commission, rebate, or similar.

United Arab Emirates (4 of 4)

Indirect Tax (2 of 2)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Article 23(2) of the UAE VAT Executive Regulation defines an “Electronic Marketplace” as “a distribution service operated by electronic means—including a website, internet portal, gateway, store, or distribution platform—that meets the following conditions: • Enables suppliers to provide electronic services to customers. • Ensures that supplies made through the marketplace are executed electronically.”
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Further guidance from the tax authorities is awaited.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	Currently, there is no specific VAT guidance in the UAE regarding the tokenization of real-world assets.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	There are no dedicated VAT or equivalent rules addressing decentralized finance (De-Fi) activities.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No specific rules or domestic consultations currently exist for VAT reporting of crypto asset transactions.

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United Kingdom (1 of 6)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes. While no specific tax legislation is in place regarding the taxation of cryptocurrencies, His Majesty's Revenue and Customs ("HMRC") issued Cryptoassets Manual ("CM") on 30 March 2021, which provides guidance on how HMRC is going to treat a transaction by corporation or individuals vis-à-vis cryptoassets. The CM is not legally binding on taxpayers, but does indicate the position likely to be taken by HMRC concerning crypto assets. In 2022 the CM was extended to provide guidance on decentralised finance (DeFi) transactions. The UK government recently concluded a formal consultation with the public on tax treatment of DeFi transactions. The intention is that the taxation of lending or staking of crypto assets should broadly follow the tax regime for repo and stock lending transactions. In addition, the government intends to introduce rules to provide that all returns from crypto asset lending and staking transactions are to be treated as revenue returns to be taxed as miscellaneous income. These changes have not yet been promulgated.
2. If “yes”, what is the scope of taxability?	In general, any profit or gain arising from a token would be expected to be taxable. The exact taxing provision would depend on the nature and use of the token. Importantly HMRC does not consider crypto assets as currency or money but a separate class of asset. However, every token needs to be considered on a standalone basis based on its characteristics. While crypto assets are, legally, intangible assets, they generally do not fall in the intangible asset tax regime for companies because they are not for "enduring use" within a business. Therefore, they usually are chargeable assets (i.e., subject to the capital gains tax regime) for companies and individuals.
3. What are the direct tax implications?	Income from trading crypto assets are taxed as profits of a company or a business if certain conditions/factors are met; otherwise, any gains arising will be taxed as capital gains. In general, purchases and sales of crypto assets would be considered trading transactions only if they form an integral part of a conventional trade (for example selling tokens linked to the company’s physical product). Investment and speculative activities are not treated as trading unless they are a systematic activity done with the frequency comparable to professional financial instrument dealing. Companies holding crypto assets for speculative dealing or as an investment are subject to pay corporation tax under the capital gains rules on any gains on the sale of the crypto asset.

United Kingdom (2 of 6)

Direct Tax (2 of 3)

Question	Response
3. What are the direct tax implications? (cont'd)	In HMRC's view, individuals will be considered trading in crypto assets only in exceptional circumstances. However, if the taxpayer's activity is considered to be trading in crypto assets, the income will be subject to income tax. Otherwise, capital gain tax is payable on the gains arising from the sale of the crypto assets. Crypto assets received as employment income are treated as 'money's worth' and are subject to income tax and National Insurance contribution based on the value of Assets. Where crypto assets are held via a partnership, the normal rules apply by which the activities of the partnership are taxed on the partners. The guidance on DeFi transactions provides that in general the transfer of tokens to another party (for example as a loan, or a "wrapping" investment) is a disposal of the original tokens, crystallizing capital gains for the lender. There is a corresponding acquisition by the borrower. These positions reverse when the loan is repaid (i.e., the borrower disposes of the tokens, and the lender re-acquires them). Further consultation is taking place on this topic, and HMRC is considering whether the rules should be aligned with rules for analogous stock transactions such as repos and stock lending, where no taxable disposal occurs.
4. Are there any other relevant/noteworthy tax considerations?	HMRC continues to look very closely at crypto transactions. We have seen a growing number of tax audits. In addition, HMRC is sending letters to taxpayers who are believed to hold crypto, encouraging them to disclose all taxable gains relating to their crypto holdings or otherwise face penalties.
5. What are the tax compliance/ reporting requirements?	Companies and individuals are required to file annual tax returns. There are no special reporting requirements for crypto transactions.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	The consultation period in relation to the draft CARF legislation has now closed, the rules will soon be published in final form.
7. If "yes", is there an indication on the implementation and reporting timeline?	1 Jan 2026 effective date for the legislation with reporting in May 2027.
8. Are there/do you expect there to be any deviations from the OECD framework?	There are no deviations from the standard, however, there are specific local implementation elements - notification, registration, penalty framework etc.

United Kingdom (3 of 6)

Direct Tax (3 of 3)

Question	Response
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	Not applicable.

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United Kingdom (4 of 6)

Indirect Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	HMRC has limited public guidance on cryptocurrency (https://www.gov.uk/hmrc-internal-manuals/cryptoassets-manual/crypto45000): • VAT is due in the normal way on any goods or services sold in exchange for crypto asset exchange tokens. • Exchange tokens received by miners for their exchange token mining activities generally will be outside the scope of VAT on the basis that: - the activity does not constitute an economic activity for VAT purposes because there is an insufficient link between any services provided and any consideration; and - there is no customer for the mining service. • Charges (in whatever form) made over and above the value of the exchange tokens for arranging any transactions in exchange tokens, will be exempt from VAT. • The financial services supplied by bitcoin exchanges - exchanging bitcoin for legal tender and vice versa - are exempt from VAT. In respect of all other tokens (securities, utility and NFTs) there is no public guidance on the UK VAT or ESS implications.
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	No public guidance from HMRC is available on the VAT treatment of NFTs.
4. Treatment of NFTs sold in exchange for cryptocurrency?	Based on our understanding of how the industry is currently dealing with VAT, we consider that where an NFT is supplied in return for consideration or given away, it will be considered a taxable supply. Based on the characteristics of a NFT, it most likely is to be taxed as an Electronically Supplied Service ("ESS"), the rules which apply to the digital supply of non-tangible Goods (i.e., services). The VAT applicable will depend on whether the transaction is conducted on a B2B or B2C basis (and whether it is effected via an online platform or not – see further comments on this below).

United Kingdom (5 of 6)

Indirect Tax (2 of 3)

Question	Response
5. Are there any other applicable exemptions relating to cryptoassets?	In relation to transactions in cryptocurrency, there are exemptions available for acting as an intermediary in relation to the buying and selling.
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	There is not a clear definition of a marketplace for digital services. However, there is guidance on digitals sales through “digital portals, platforms, gateways or marketplaces”. Where a business supplies e-services (e.g. NFTs) to consumers through an internet portal, gateway or marketplace, there are special rules that determine whether that business is the party making the supply to the consumer or if it is the platform operator – we have summarised these rules below.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	This depends on the role taken by the online marketplace in the sale of the NFTs. The platform operator is supplying the consumer (and therefore has the obligation to account for any VAT due on the supplier to the consumer) if the platform operator identifies the seller to the consumer but: • sets the general terms and conditions, • authorises payment or handles delivery or download of the digital service.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	No public guidance from HMRC is available.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	No public guidance from HMRC is available.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	No public guidance from HMRC is available.

United Kingdom (6 of 6)

Indirect Tax (3 of 3)

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United States (1 of 6)

Direct Tax (1 of 3)

Question	Response
1. Is there tax authority guidance or direct tax law on cryptocurrency?	Yes, selected guidance below: • Final Regulations on gross proceeds and basis reporting by brokers and determination of amount realized and basis for digital asset transactions released on June 28, 2024; • Final Regulations requiring DeFi brokers to file information returns released on December 27, 2024 • Rev. Proc. 2024-28 and Notice 2025-7 each provides guidance to allocate basis in digital assets to wallets or accounts as of January 1, 2025; • Rev. Rul. 2023-14 addressing inclusion of staking rewards in income for cash-method taxpayers; • Notice 2023-27 providing that NFTs should be treated as collectibles; • Infrastructure Investment and Jobs Act of 2021 addressing digital asset information reporting for brokers; • FinCEN Notice 2020-2 addressing Report of Foreign Bank and Financial Accounts (FBAR) reporting requirements related to virtual currency • Rev. Rul. 2019-24 addressing hard forks and air drops; • Notice 2014-21, as modified by Notice 2023-34 providing limited guidance on certain convertible virtual currencies treated as property for federal tax purposes; • Informal advice (in the form of general legal advice memoranda) and “Frequently Asked Questions” posted on the IRS website.
2. If “yes”, what is the scope of taxability?	In general, cryptocurrency is treated as general property and consequently general tax principles are applied to transactions that involve cryptocurrency. Gain from the sale or disposition of cryptocurrency is subject to US tax. Whether the gain is capital or ordinary depends on the nature of the asset in the hands of the taxpayer (inventory, capital asset, etc.).

United States (2 of 6)

Direct Tax (2 of 3)

Question	Response
2. If "yes", what is the scope of taxability? (cont'd)	Periodic income generated from activities with respect to cryptocurrency (like lending, mining, staking, etc.) is also subject to tax generally at ordinary income rates depending on the taxpayer's activity (business activity, hobby etc). The Final Regulations released in 2024 related to third party information reporting and backup withholding (1) finalize the general framework of the proposed regulations issued in August 2023, (2) require brokers to file information returns and furnish payee statements reporting gross proceeds and adjusted basis on dispositions of certain digital assets effected for customers in certain sale or exchange transactions, and (3) impose obligations to file information returns and furnish payee statements on dispositions of digital assets based on companies engaging in a broad array of services or activities related to digital assets.
3. What are the direct tax implications?	There are a number of relevant direct tax considerations, highlighted here: • Income tax characterizations for different types of digital assets (cryptocurrency, utility tokens. stablecoins, or NFTs) by use case by taxpayer profile; • Timing of income recognition and deductions (available elections); • Tax basis determinations (permissible methods and valuations): • Sourcing and jurisdictional allocations; • Tax treatment for lending, staking, and other common activities (e.g., DeFi); • Consequences to foreign corporations owned directly or indirectly by a U.S. shareholder.
4. Are there any other relevant/noteworthy tax considerations?	There are a number of other relevant considerations for funds (asset managers) that should be analyzed carefully; for example: Trade or Business activities, ECI, and UBTI. Other considerations around cross-border implications such as nexus, asset management, and withholding obligations when transacting cross-border.
5. What are the tax compliance/ reporting requirements?	Individuals: Income tax filers must specifically disclose whether they had transactions in cryptocurrency during the course of the tax year, in addition to reporting any income, deduction, gain or loss relating to such activities.

United States (3 of 6)

Direct Tax (3 of 3)

Question	Response
5. What are the tax compliance/ reporting requirements? (cont'd)	Business entities: In general, taxpayers are required to follow the income reporting requirements for assets of similar classes with respect to cryptocurrency transactions. Intermediaries (brokers): Pursuant to the 2024 Final Regulations, cryptocurrency brokers are required to report on digital asset sales that they effected for certain of their customer. The definition of digital assets (cryptocurrency) for purposes of information reporting has been expanded to cover a wide scope of property and are effective starting with transactions occurring in calendar year 2025.
6. Has the tax authority issued any announcement / consultation / guidance regarding crypto asset reporting framework or equivalent?	Yes.
7. If "yes", is there an indication on the implementation and reporting timeline?	The preamble to the 2024 Final Regulations indicates that Treasury and the IRS plan to propose regulations to implement the OECD's forthcoming Crypto Asset Reporting Framework (CARF) by 2028 for 2027 transactions. The 2024 Final Regulations reserve on the rules requiring non-US brokers to report information on US customers to the IRS to coordinate the rules Section 6045 of the Internal Revenue Code with the new rules that implement the CARF. The preamble to the Final Regulations indicates that Treasury and the IRS plan to propose regulations to implement the OECD's forthcoming Crypto Asset Reporting Framework (CARF) by 2028 for 2027 transactions.
8. Are there/do you expect there to be any deviations from the OECD framework?	Yes.
9. If there are deviations from the OECD framework expected such as local transaction reporting, please provide an overview of these deviations.	The Biden administration had planned to align CARF with Form 1099-DA reporting and the digital asset reporting regulations, with provisions to be effective January 2027, with reporting in 2028. The approach that the Trump administration may take with respect to CARF is yet to be determined.

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United States (4 of 6)

Indirect Tax (1of 3)

Question	Response
1. Is there tax authority guidance or GST / VAT / ESS or equivalent law on cryptocurrency?	Yes, various US states have provided sales and use tax guidance.
2. If "yes", what is the position for GST / VAT / ESS or equivalent?	States that have provided guidance generally treat cryptocurrency as intangible property or a medium of exchange, with no sales tax due on cryptocurrency exchanges. However, sales tax is due when cryptocurrency is used to purchase taxable property and services. State guidance varies as to how to compute the tax base (e.g., advertised selling price of the product (CA), cryptocurrency value at the time of the transaction (NY), or cryptocurrency value as of the date of payment (NJ)).
3. Are NFTs defined and/or subject to GST / VAT / ESS or equivalent?	State taxing authorities have not adopted a uniform definition of NFTs. Various states have provided definitions of NFTs through general tax department guidance. For example, draft updated guidance on NFTs from the Washington Department of Revenue (October 2024) defines NFTs as "a unique digital identifier that cannot be copied, substituted, or subdivided, that is recorded in a blockchain, and that is used to certify authenticity and ownership of a specific type of product. NFTs are distinguishable from cryptocurrency, which is a type of fungible token." The states that have defined NFTs may tax them under a variety of approaches. For example, the Washington State guidance above that "it is critical to consider the…underlying product (e.g., a good, service, or other item of value) that is represented by the NFT [and] whether the transaction involves only one product (e.g., a physical painting) or more than one product (e.g., a ticket to a concert, a signed photograph of the performing artist, and a digital code allowing the purchaser to download the artist's new album)." On the other hand, Pennsylvania, however, merely states that NFTs are taxable. (Pennsylvania Bulletin: Notice of Taxable & Exempt Property, Pennsylvania Department of Revenue, 6/11/22). Most other states have not issued guidance, and as such, NFTs may not (yet) be subject to tax. Michigan advises that because it does not "generally tax digital goods," an NFT "is not subject to Michigan sales tax if it is purely digital, such as a digital image or sound. Conversely, if the NFT represents an ownership interest in tangible personal property… the sale constitutes the sale of tangible personal property and is subject to tax."
4. Treatment of NFTs sold in exchange for cryptocurrency?	Please see above for how states may treat the sale of NFTs in exchange for cryptocurrency.
5. Are there any other applicable exemptions relating to cryptoassets?	It depends. Sales tax exemptions generally will not apply unless the exemption is based on an exempt purchaser or an exempt use.

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Indirect Tax (2 of 3)

Question	Response
6. Is there a definition of marketplace for GST / VAT / ESS / remote services or equivalent purposes?	Yes, all 46 states that impose a statewide sales tax define “marketplace facilitator” for purposes of requiring tax collection. Laws are not uniform, but states generally define a “marketplace facilitator” as having two components: (1) perform one or more of a set of activities related to the sale of property or services, such as listing taxable property for sale at retail, in a forum it owns or controls; and (2) directly or indirectly, through agreements or arrangements with third parties, collect the payment from the purchaser and transmit the payment to the person selling the products or services, or otherwise provide payment processing services. As noted below, peer-to-peer online marketplaces for exchanging NFTs may not fall within these definitions.
7. If a marketplace is involved, who has the obligation to account for GST / VAT / ESS or equivalent on the sale of NFTs?	Generally, the marketplace is required to collect tax on sales made through the marketplace with limited exceptions. In certain states, sellers may also be liable for the tax. However, peer-to-peer online marketplaces for exchanging NFTs may not fall within the states’ definitions of “marketplace facilitator” (which vary by state). Additionally, even if the marketplace is not obligated to collect tax on the sale of the NFT, certain marketplace fees may be taxable.
8. Is there any specific guidance in GST / VAT / ESS or equivalent rules on tokenisation of real-world assets? Please also state whether the token has a different character / nature from the underlying real-world asset.	In general, whether the token has a different character / nature from the underlying real-world asset will depend on the rights transferred with the token.
9. Are there any specific De-Fi GST / VAT / ESS or equivalent rules or tax authority guidance?	Not at this stage. Financial instruments and financial services generally are not subject to US sales tax. However, businesses who sell the technology used to render those services, including software and digitally automated services, may be taxable.
10. Are there specific rules or domestic consultations for crypto asset transaction reporting specifically catered for indirect taxes?	Not applicable.

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Thank you

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