

Crypto Allocation Briefings

Global Wallets – Local Taxes

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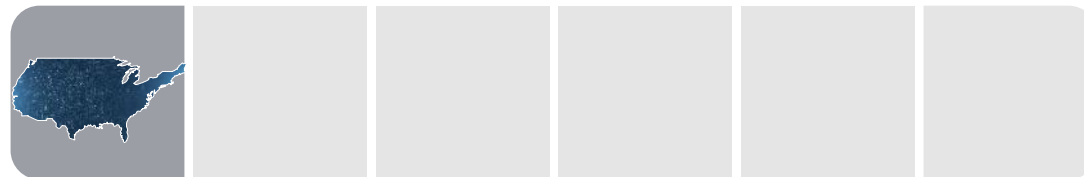
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United States



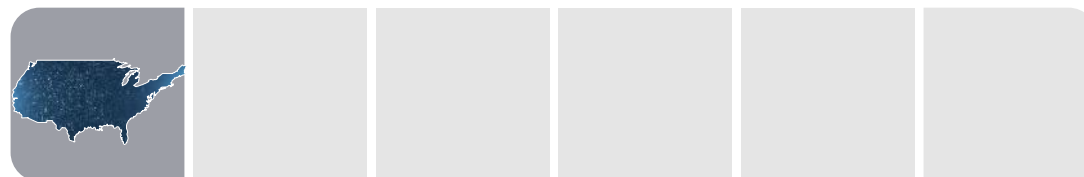
1. Regulatory Status
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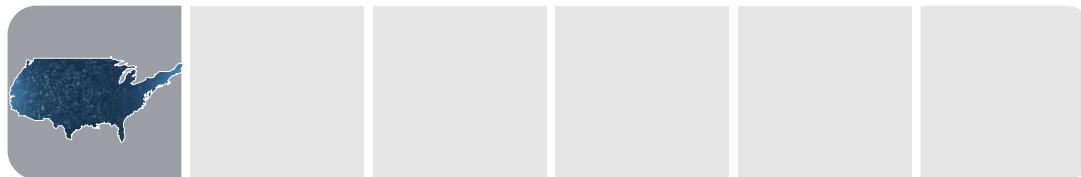
- No single comprehensive federal cryptocurrency statute.
- Regulation of crypto depends on asset classification and activity.
- Multiple federal and state regulators assert jurisdiction.
- Multiple regulators: Securities and Exchange Commission; Commodity Futures Trading Commission; Financial Crimes Enforcement Network (FinCEN); Federal Reserve; Office of the Comptroller of the Currency; Federal Trade Commission; Department of Justice; and various state regulators.

and ... Trump is working to ease regulation and support the industry...





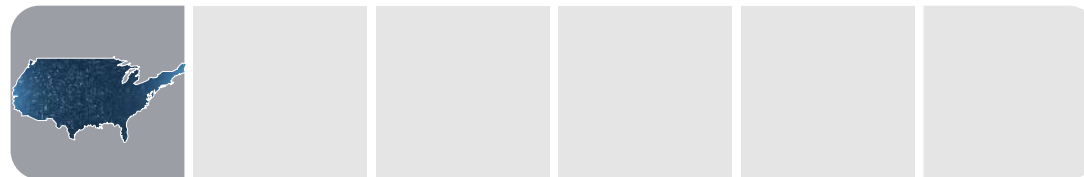
- Trump has advanced legislative, executive, and regulatory initiatives to expand the legal and regulatory recognition of digital assets.
- The changes do not generally alter federal income, gift, or estate tax treatment of digital assets, but have significant implications for custody, administration, regulatory compliance, and the ability of fiduciaries and financial institutions to hold and transfer digital assets.
- This includes the GENIUS Act and several executive orders and regulatory rulemaking – and the appointment of regulators supportive of digital asset innovation.





The “PayPal Mafia” and Silicon Valley network have assumed significant federal policymaking and regulatory oversight roles:

- David Sacks — Appointed White House AI and Crypto Czar in December 2024, with responsibility for helping shape federal digital asset policy.
- Bo Hines — Initially appointed executive director of the President’s Council of Advisers for Digital Assets.
- Marc Andreessen and Fred Ehrsam — Technology and cryptocurrency investors appointed to the President's Council of Advisors on Science and Technology in March 2026.
- Paul Atkins (SEC Chair), Jonathan Gould (Comptroller of the Currency), Michael Selig (Chair of CFTC) ... Vice President JD Vance.



The Tax Framework



Crypto = property

Since IRS Notice 2014-21, digital assets are property for federal tax purposes: every sale, swap or spend is a disposal. Later guidance covers hard forks, airdrops and staking (Rev. Rul. 2019-24, 2023-14).

Applies to US citizens and residents on worldwide income – individuals, trusts, estates and entities alike. State income tax usually applies in addition to federal taxes.

Up to 37%

Ordinary tax rates on short-term gains (held one year or less) and on crypto received as ordinary income – pay, mining, staking, and airdrops.

0% / 15% / 20%

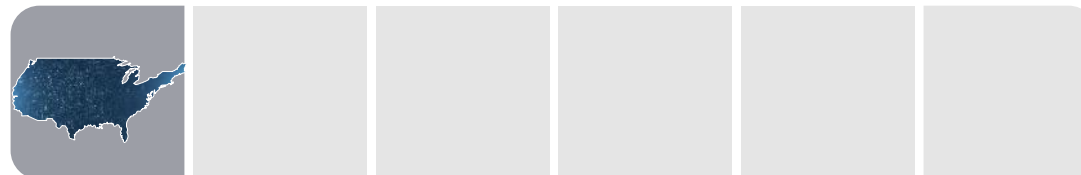
Long-term capital gain rates (held more than one year), plus the 3.8% net investment income tax for higher earners. State tax is in addition to federal taxes.

\$15M

2026 federal estate and gift tax exemption per person (indexed for inflation). Each taxpayer may also transfer an annual exclusion amount of \$19,000 per donee (2026). Coins transferred by gift retain the donor's basis; inherited coins step up under Section 1014 to date-of-death value (some exceptions).

Form 1099-DA

Brokers report gross proceeds for 2025 sales and exchanges; basis reporting starts for assets acquired on or after 1 January 2026.



What Triggers Taxation / What Does Not



Taxed on disposal – capital gain or loss

- Sale for fiat currency
- Crypto-to-crypto swaps – includes trades for stablecoins
- Paying for goods or services with crypto
- NFT sales – may be “collectibles” taxed at up to 28%
- Gain = proceeds less basis; rate depends on holding period.

Taxed on receipt – ordinary income

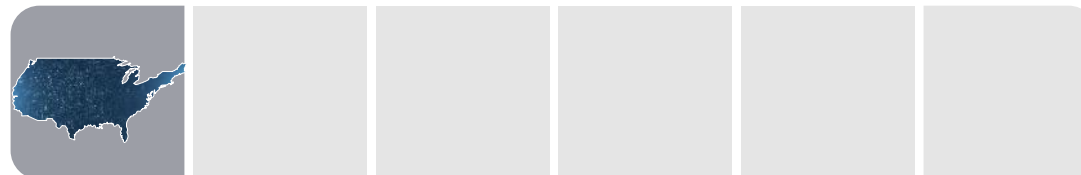
- Mining and staking rewards, at fair value when control is gained
- Airdrops and hard forks when coins can be accessed
- Crypto received as pay or for services
- DeFi and lending yield
- Play to earn NFTs and other gaming assets are taxable on receipt
- Fair value at receipt is the tax basis

Not a taxable event

- Buying crypto with dollars
- Transfers between wallets or accounts
- Simply holding - no wealth tax
- Gifts - no income tax; gift tax reporting above the annual exclusion
- Borrowing tokens or DeFi (depending on structure)
- Charitable gifts - no gain recognized; deduction may apply

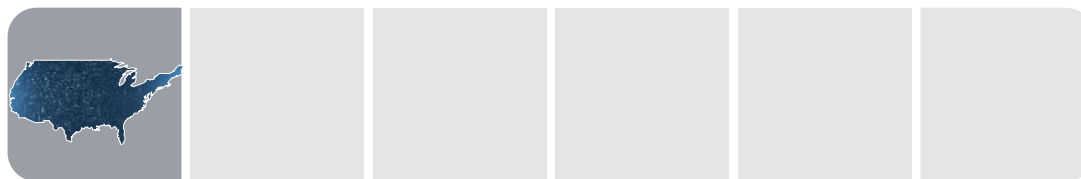
Selected Gray Areas:

Wash-sale rule does not currently apply to crypto that is not a security (not “stock or securities”) - a recurring legislative target • liquidity pools, wrapped tokens and DeFi transactions • timing of staking income (*Jarrett* case) • NFTs as “collectibles” (Notice 2023-27) • self custody interactions (DAOs and DeFi)



The Service changed how taxpayers must identify tax basis of crypto in wallets and accounts:

- **Effective January 1, 2025:** Basis identification generally required separately for each wallet or custodial account; universal basis pooling eliminated.
- **Specific Identification:** Taxpayer may select particular coins sold or transferred if properly identified and documented before time to sale, disposition or transfer.
- **FIFO Default:** Absent adequate identification, earliest-acquired units within the applicable wallet or account are treated as disposed of first.
- **Transfers:** Transfers between a taxpayer's wallets generally are not taxable, but basis and holding periods must be traced.
- **Transition Relief:** Rev. Proc. 2024-28 permits qualifying allocations of previously unused basis to wallets and accounts as of January 1, 2025.
- **2026 Relief:** Notice 2026-20 extended temporary custodial broker identification relief through December 31, 2026 (taxpayer can identify in contemporaneous records).



01 Cost basis

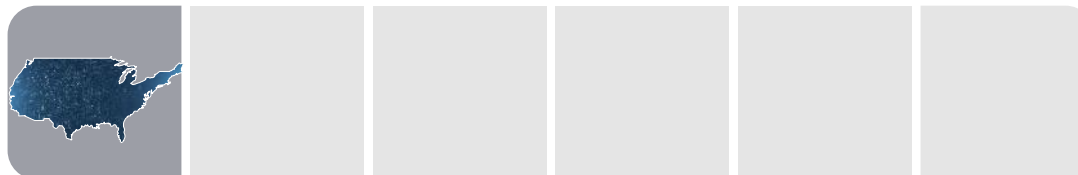
- Tracked wallet by wallet and account by account since 1 Jan 2025 (Treas. Reg. § 1.1012-1(j))
- Specific identification of units sold, otherwise first-in, first-out (Notice 2025-7 gives temporary relief)
- Rev. Proc. 2024-28: safe harbor to allocate unused basis across wallets
- Fees add to basis on purchase and reduce proceeds on sale

02 Losses

- Capital losses offset capital gains first – short-term against short-term, long-term against long-term, then across
- Net loss: up to \$3,000 a year against ordinary income; the rest carries forward indefinitely
- No wash-sale rule for crypto that is not stock or securities, so loss harvesting may be available – legislation has been proposed

03 Reporting & filing

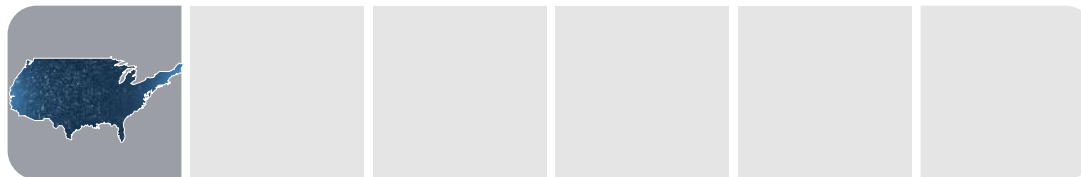
- Dispositions on Form 8949 and Schedule D; income on Schedule 1 or C
- Digital asset question on Form 1040, answered under penalties of perjury
- Reconcile Form 1099-DA with your own records – 2025 forms show gross proceeds only
- Business receipts over \$10,000: Form 8300 (§ 6050I) – digital asset reporting deferred
- Penalties: 20% accuracy, 75% civil fraud, criminal exposure for willful evasion



The Service is Cracking Down on Cryptocurrency



- Individual Form 1040 has a question: “At any time during 2025, did you: (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, or otherwise dispose of a digital asset (or a financial interest in a digital asset)?” This is answered under penalties of perjury.
- Similar questions on other tax forms – corporate/partnership/fiduciary/gift tax/estate tax.
- Beginning in 2026, additional reporting requirements apply to real estate transactions involving crypto. Likewise, Section 6050I was amended to require Form 8300 compliance and treat digital assets as cash for purposes of reporting receipts exceeding \$10,000 in a trade or business. Transitional relief in 2024 defers this treatment until final regulations are issued.
- For 2025, brokers must report gross proceeds for digital asset sales and exchanges directly to the IRS. New Form 1099-DA is used for digital asset sales/exchanges beginning with the 2025 tax year – tax basis reporting is phased in with 2026 tax year.
- The IRS uses “John Doe” summonses to obtain customer data from major exchanges (Coinbase, Kraken, and others). Courts have enforced the summonses, and in 2025 the Supreme Court declined to take up the *Harper* constitutional challenge, closing the door to further review.

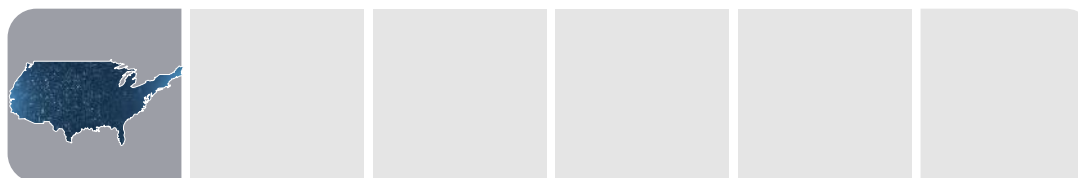


United States | Worked example: one investor, one year

Alexa, US resident, private investor. Holds 100 BTC bought in 2019 at \$7,000 each, 500 ETH bought in 2023 at \$1,500 each, and a memecoin bought in 2026

2026 event	Treatment	Tax (USD)
Sells 20 BTC for \$1,800,000	Long-term gain $\$1,800,000 - \$140,000 = \$1,660,000$ at 23.8%	395,080
Swaps 150 ETH into SOL	Taxable swap: gain $\$450,000 - \$225,000 = \$225,000$ at 23.8%	53,550
Sells 200 ETH for \$600,000	Gain $\$600,000 - \$300,000 = \$300,000$ at 23.8%	71,400
Pays 2 BTC (\$180,000) for a car	Spending is a disposal: gain = $\$180,000 - \$14,000 = \$166,000$ at 23.8%	39,508
Lends \$500,000 USDC, earns \$20,000 USDC	Interest is ordinary income at 40.8%, basis \$20,000	8,160
Earns 5 ETH staking as a validator	Ordinary income at fair value (\$15,000) at 40.8%, basis \$15,000	6,120
Sells a memecoin: paid \$200,000, gets \$1,000	Short-term loss of \$199,000 nets against long-term gains – saves 23.8%	– 47,362
Total Tax 2026		526,456

Simplified: assumes 37% + 3.8% NIIT (Net Investment Income Tax) on interest and staking income (40.8%) and 20% + 3.8% on long-term gains (23.8%) [NIIT treatment applies based on nature of the activity and applicable statutory requirements and is assumed in this model to apply to staking income and USDC lending income]; \$90,000 per BTC, \$3,000 per ETH; excludes state income taxes and fees. The remaining 78 BTC (unrealized gain of about \$6.5 million) is untaxed until sold. Assumes staking income taxed on receipt.



Live Now

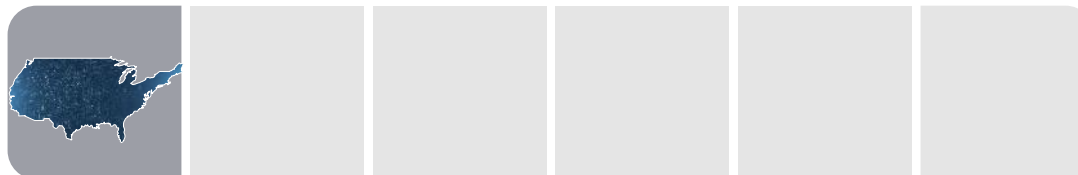
- Service is gathering information and is tax aggressive
- Form 1099-DA: gross proceeds for 2025 sales and exchanges; tax basis reporting from 1 Jan 2026
- Real estate closings from 1 Jan 2026: fair value of digital assets reported
- Digital asset questions on tax forms
- John Doe summonses to exchanges and use of information to assess taxpayers

What it Means

- The IRS can match 1099-DA data to returns - mismatches may trigger notices
- Self-custody, DeFi and foreign-platform activity is still reportable for tax purposes
- Keep records wallet by wallet: dates, basis, fair value at receipt
- Statute of Limitations: 3 years; 6 if over 25% of gross income is omitted; open-ended statutory period for fraud

Watch List

- Crypto Tax: Wash-sale rules, de minimis exemptions, and staking tax treatment.
- DeFi and Broker Reporting: Further IRS guidance on decentralized exchanges, noncustodial platforms, and reporting obligations.
- GENIUS Act implementation and treatment of stablecoins.
- International Reporting: OECD CARF implementation will expand cross-border reporting and automatic exchange of information concerning crypto transactions. US participation and interaction with FATCA should be monitored.
- Digital Asset Custody: SEC, OCC, and banking regulations affecting custody and fiduciary administration.

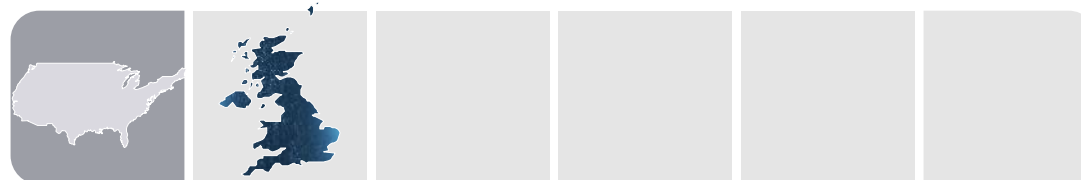


United Kingdom



1. General tax principles – crypto held by individuals

- Cryptoasset gains generally subject to capital gains tax at 24%.
- Except if trading in cryptoassets – in which case returns are taxable as trading income at 45%. But this should be rare.
- Crypto is an asset subject to inheritance tax (40% tax on death).

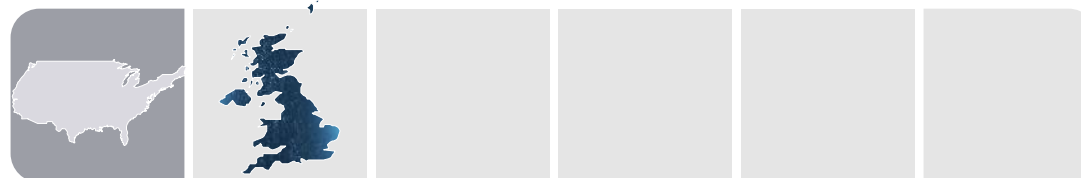


United Kingdom



2. Tax for internationally mobile individuals

- New arrivers to the UK may benefit from **100% relief from tax on crypto gains** for **first four years** if crypto situated outside the UK
- And no exposure to UK inheritance tax for **first ten years of residence** on crypto situated outside UK
- Where is crypto situated? Key question – who is the beneficial owner of the crypto?
- **Advance planning is essential** for new arrivers to the UK to optimise UK treatment – e.g. transferring to a non-UK company

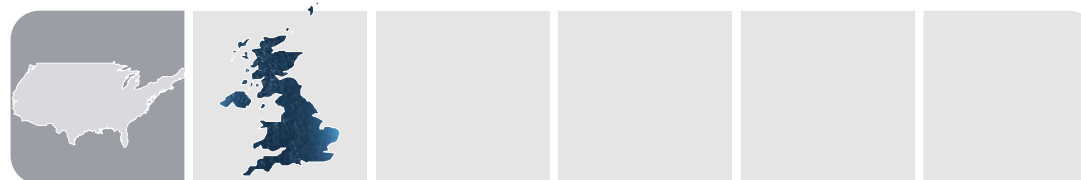


United Kingdom



3. New developments

- Crypto recognised as a new category of personal property under English law
- New rules for stablecoins – should generally be outside scope of capital gains tax from April 2027
- UK implementing Cryptoasset Reporting Framework – UK tax authorities collecting transaction data for UK resident customers of crypto platforms; increased focus on compliance and tax reporting



Switzerland | Private investors: what is taxed – and what is not

Tax-free – private capital gain, e.g.

- Sale for CHF or any other fiat currency
- Crypto-to-crypto swaps, incl. into stablecoins
- Paying for goods or services with crypto
- NFTs bought and sold as a collector (art-trade criteria)

>> Flip side: losses and transaction costs are not deductible.

Taxable income – on receipt

- **Staking** (pool / delegated): income from movable assets, Art. 20 Direct Federal Tax Act ("DBG")
- **Lending, DeFi yield**: interest-like income
- **Airdrops**: market value at allocation
- **Tokens as salary or bonus**: employment income (subject also to soc sec)
- **Mining**: taxable income – business income if run like a business

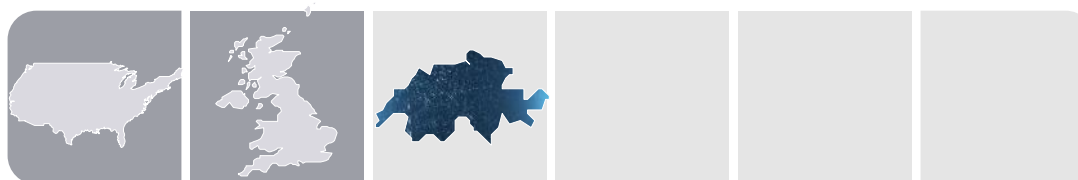
>> CHF value at inflow counts; later gains on the reward coins are tax-free again.

Grey zone – facts decide

- Solo validator / node operator: Art. 20 DBG or self-employment?
- Mining at scale (hardware, hosting, debt): self-employment, social security – but costs deductible
- Liquid staking, wrapped tokens, LP positions: case by case
- NFT minting by artists: business income
- Frequent trading: see professional trading test

>> No published ESTV practice on most DeFi structures – ruling advisable.

Wealth tax on everything at 31.12. – including staked, locked or lent coins and NFTs. No Federal Tax Authority ("ESTV") rate? - Value of a leading platform; if none, acquisition cost (ESTV working paper).



Switzerland | Professional trading – and how to structure around it

Safe Harbour (ESTV circular nr. 36)

- Holding period of at least 6 months
- Annual volume $\leq 5 \times$ portfolio at start of year
- Gains ≤ 50 % of net taxable income
- No debt financing (or investment income exceeds interest)
- Derivatives only for hedging

>> All five met → private wealth management.

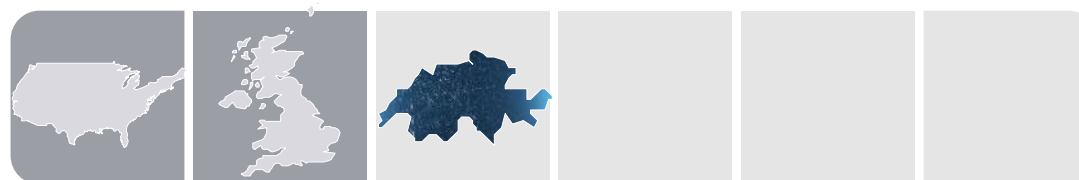
>> Missing one ≠ professional: overall assessment (frequency, volume, leverage, know-how, system).

Implications of professional trading

- Gains = income from self-employment (Art. 18 DBG): income tax plus c. 10 % social security
- Losses deductible if booked – 7-year carry-forward [to be extended to 10 years]
- Crypto becomes business assets: moving abroad or stopping = taxable hidden reserves
- A mandated manager's trades are attributed to taxpayer (BGer 2C_868/2008) – delegation is no shield

Structuring options

- Separate long-term core holdings from active trading and yield – incl. separate wallets and records (tracking)
- Put trading, mining or validating into a company: profit tax c. 12–21 %, costs deductible – the private core stays tax-free + foresee a reasonable salary out of company
- No Lombard loans against crypto in private wealth / no debt financing in general
- Tax ruling with the cantonal tax authority (define thresholds)



Switzerland | Family offices and companies – succession and mobility

COMPANIES & FAMILY OFFICES

Taxation

- Gains and yield subject to profit tax (c. 12–21 % effective); losses deductible, 7-year [soon 10-year] carry-forward
- Tax follows the accounts: acquisition costs vs fair market value (listed tokens) ; principle of caution (Swiss GAAP)
- No participation deduction on crypto; payment tokens outside stamp duties – asset tokens mirroring shares or bonds are taxed like securities (WHT)

Employee incentives in tokens

- Salary at value on receipt + social security; only tokens with shareholder rights are employee participations (KS 37)

VAT

- Cf. next slide

SUCCESSION & MOBILITY

Passing on

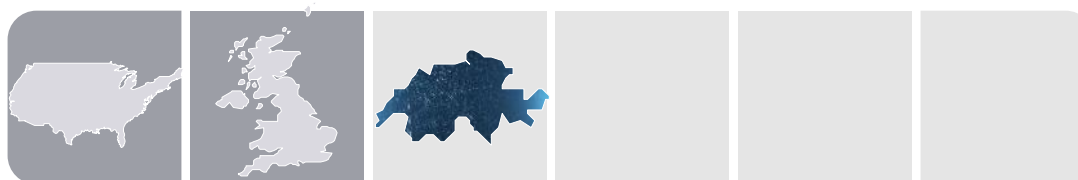
- Inheritance and gift tax are cantonal: spouses exempt everywhere, descendants in most cantons; no inheritance tax in SZ and OW
- Federal 50 % inheritance tax (JUSO initiative) rejected on 30 Nov 2025 – 78 % No
- The real risk is access: seed phrases, multi-sig, instructions for executors

Moving in

- No step-up needed – private gains are tax-free anyway. But potential exit tax abroad to be checked.

Moving out

- No exit tax on privately held crypto. Professional traders and companies: transfer abroad realises hidden reserves



Switzerland | VAT – the tax often forgotten..

Secondary market: the token type decides

- **Payment tokens:** buying and selling exempt, like FX
- **Asset tokens:** exempt, like securities
- **Utility tokens:** taxable – VAT follows the embedded service; Swiss VAT if that service is supplied in Switzerland

Staking: block reward ≠ transaction fee

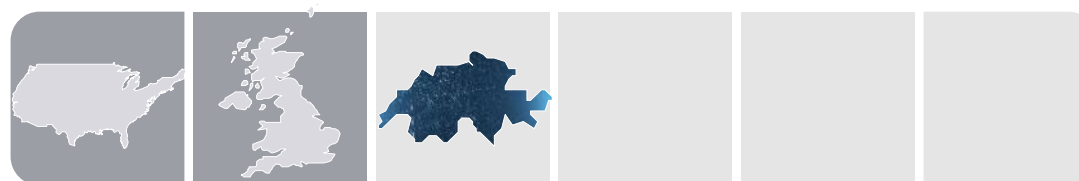
- Federal Administrative Court (Polkadot):
 - Block rewards = non-consideration – no identifiable recipient; input VAT not reduced
 - Transaction fees: taxable e-service to the sender, taxed where the sender sits
- ETH staking case: senders pseudonymous → node location as proxy, > 99 % abroad – confirmed via tax ruling

Utility tokens across borders

- Swiss VAT-registered buyer from a foreign seller: reverse charge (*Bezugsteuer*)
- Swiss private buyer: reverse charge once such purchases exceed CHF 10k p.a.
- Foreign seller of e-services to Swiss non-registered buyers: Swiss VAT registration once worldwide turnover ≥ CHF 100k

War story: Digital value, physical borders (NFT)

- Artist-signed digital frame shipped physically, playing an artwork with ownership transfer via NFT
- Declared: frame only
- Customs: one work, one price → import VAT on the total + criminal proceedings (which we in the end could stop)



Austria | The framework



27.5 %

Flat rate on all crypto income for private investors – gains and yield alike. No holding period, no progressive rates.

1 March 2021

The cut-off date. Coins bought earlier are “legacy assets” and stay tax-free once held for a year; later purchases are “new” and always taxable.

Crypto = income from capital assets

Since 1 March 2022 crypto sits in the same tax box as shares and bonds (sec. 27b Austrian Income Tax Act) – with a few crypto-specific twists.

Applies to private investors and to individuals holding crypto in a business, unless crypto trading is the core business itself.

0 %

No inheritance tax, no gift tax, no wealth tax. But: gift reporting, exit tax on departure and a 23 % / 27.5 % regime for companies and foundations.

2026

The transparency year: DAC8/CARF reporting is live since 1 January 2026 – first data exchange in 2027.



Austria | Legacy vs. new holdings: the 1 March 2021 line

LEGACY (Altvermögen) – bought before 1 March 2021

Old speculation rules (sec. 31 EStG)

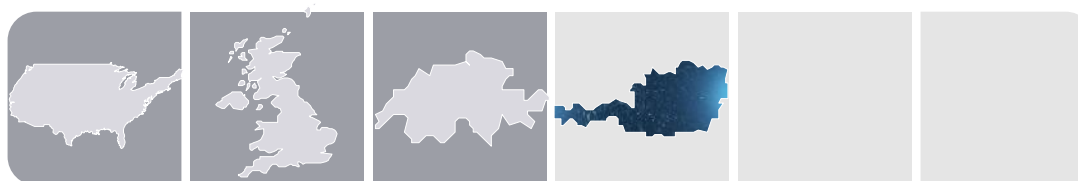
- Tax-free once held for more than one year; sold within a year: progressive rate up to 55 %
- Swapping legacy coins after 1 March 2022 is a disposal (tax-free after a year) – but the coins you receive are “new”
- Legacy coins used for lending or staking after 28 Feb 2022: the rewards are “new”
- Legacy status passes on by gift or inheritance

NEW (Neuvermögen) – bought on or after 1 March 2021

New regime (sec. 27b EStG, in force since 1 March 2022)

- 27.5 % flat on the gain whenever sold – the holding period is irrelevant
- Taxed when sold for fiat or spent
- Crypto-to-crypto swaps are tax-neutral
- Losses net within the 27.5 % pool
- Austrian providers withhold the tax
- Exit tax on unrealised gains when leaving Austria

Status follows the coin, not the wallet. Proof of the acquisition date is important. In mixed wallets the investor chooses which units are sold first (default: oldest first). No acquisition data known or given to provider? Presumption of “new” coins and 50 % of the proceeds as cost – and the withholding is not final.



Austria | What triggers tax – and what does not

Taxed now – 27.5 %

- Sale for euro or any other fiat currency
- Paying for goods or services with crypto
- Lending and DeFi yield: taxed on receipt at the euro value of that moment – which also becomes the cost basis
- Mining by a private investor: taxed on receipt
- Crypto ETPs / ETNs are securities: 27.5 % via the bank

Deferred – cost basis zero

- Staking rewards for validating transactions (proof-of-stake)
- Airdrops and bounties
- Coins received in a hard fork

Not taxed on receipt – but the cost basis is zero, so 100 % of the later sale proceeds are taxable at 27.5 %.

Never a taxable event

- Crypto-to-crypto swaps – including into stablecoins (USDC, USDT are “crypto” too)
- Transfers between your own wallets or providers
- Simply holding – no deemed disposal, no wealth tax

The cost basis of the coins given away travels to the coins received.

Outside the 27.5 % box – progressive rates up to 55 % (or old speculation rules)

Non-securitised derivatives (futures, perpetuals, CFDs, options) unless an Austrian withholding agent applies the tax • private one-to-one crypto loans that are not publicly offered • crypto as the core business activity • NFTs are not “crypto” under sec. 27b: speculation rules, tax-free after one year.



Austria | Mechanics: cost basis, losses, withholding

01 Cost basis

- Moving-average cost per coin and per wallet address – mandatory
- Trading fees count as acquisition costs (unlike for shares)
- In case of mining, hardware and electricity costs are not deductible

02 Losses

- Net only inside the 27.5 % pool: other crypto, shares, funds, dividends
- Not against 25 % bank interest, salary, business income or legacy gains
- Same calendar year only – no carry-forward for private investors
- Option to be taxed at progressive rates instead, if that is cheaper (*Regelbesteuerungsoption*)

03 Withholding & filing

- Austrian crypto providers – and Austrian branches of foreign ones – withhold 27.5 % KEST: final taxation, automatic loss netting within the provider, tax report on request
- Foreign platforms and self-custody: self-assessment in the annual return (form E1kv), online by 30 June of the following year
- Non-residents: crypto income is outside Austria's limited tax liability – tax withheld by mistake is refundable



Austria | Cross-border: moving in, moving out, passing on

Moving in

- Resident once you establish a dwelling place or spend more than six months in one year in Austria: worldwide income taxed; treaties send private gains to the residence state (Art. 13(5) OECD MC)
- “New” coins: cost basis stepped up to market value on arrival
- Legacy coins (bought before 1 March 2021) stay legacy: tax-free after a year – the status follows the coin, not the passport

Moving out

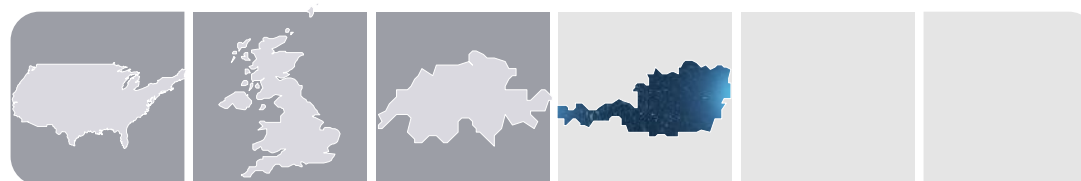
- Exit tax: 27.5 % on the unrealised gain of “new” coins – also triggered by gifting to a non-resident
- EU/EEA: on request no assessment until the actual sale or an onward move to a third country; third countries: immediate
- New since 1 July 2026 (*Budgetmaßnahmengesetz 2026*): annual proof duty where deferred income exceeds EUR 100k – a missed proof counts as a sale

Passing on

- No inheritance tax, no gift tax
- Gift reporting obligation above EUR 50k (close family, per year) or EUR 15k (others, over five years) to the tax office
- Heir or donee steps into the cost basis and acquisition date – legacy status survives

Holding structures

- Austrian GmbH and AG: 23 % corporate tax on all crypto income; losses offsettable and carried forward
- Private foundation: 27.5 % interim tax on crypto income since 2026; 3.5 % entry tax on contributions

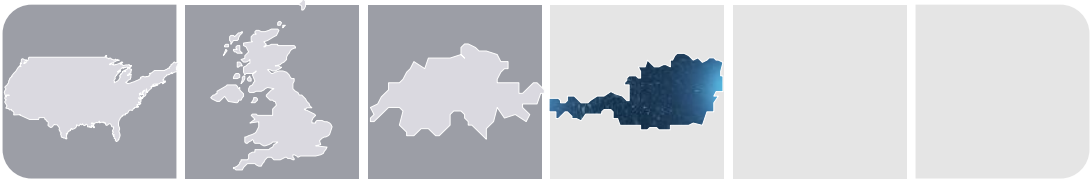


Austria | Worked example: one investor, one year

Anna, Austrian resident, private investor. Holds 2 BTC bought in 2019 at EUR 7,000 each, 10 ETH bought in 2023 at EUR 1,500 each, and a memecoin bought in 2024.

2026 event	Treatment	Tax (EUR)
Sells 1 BTC for EUR 90,000	Legacy coin, held for more than a year: tax-free	0
Swaps 3 ETH into SOL	Crypto-to-crypto: no realisation; the SOL inherits the EUR 4,500 cost basis	0
Sells 4 ETH for EUR 12,000	Gain 12,000 – 6,000 = 6,000 at 27.5 %	1,650
Pays 2 ETH (EUR 6,000) for a watch	Spending is a disposal: gain = 6,000 – 3,000 = 3,000 at 27.5 %	825
Buys and then lends 10,000 EURC, earns 400 EURC	Yield taxed on receipt at 27.5 %; the 400 EURC get a EUR 400 cost basis	110
Earns 0.03 ETH staking as a validator	Nothing now; cost basis zero – fully taxable when sold	0
Sells a memecoin: paid 4,000, gets 1,000	Loss of 3,000 nets against the 2026 gains in the 27.5 % pool (no carry-forward)	– 825
Total tax 2026		1,760

Simplified; moving-average cost per wallet ignored. Austrian provider: tax withheld and losses netted automatically. Foreign platforms: Anna self-assesses in her 2026 return.



Austria | Compliance and outlook: the transparency era

Live now

- Krypto-Meldepflichtgesetz (DAC8 + CARF) since 1 Jan 2026
- Providers record every transaction of EU-resident clients: identity, TIN, wallet addresses, gross proceeds, units, transfers
- Fines for violation of the reporting or registration obligation up to EUR 200k
- First reports to the Austrian tax office by 31 July 2027 for 2026; automatic exchange with EU and CARF partner jurisdictions

What it means for clients

- Activity on foreign platforms becomes visible from 2027 – window for a voluntary disclosure (*Selbstanzeige*) with penalty relief
- Limitation periods: five years, ten years for evasion
- Documentation wallet by wallet: acquisition dates, costs, legacy proof, reward timestamps
- Austrian-provider clients: check the tax report – wrong cost data means no final taxation

Watch list

- DeFi: liquidity providing is treated as lending (taxed on receipt); liquid staking and wrapped tokens case by case
- NFTs and non-securitised derivatives sit outside the 27.5 % regime
- Losses across several providers net only via the tax return
- Tightened exit-tax reporting since July 2026

Remember: 1 March 2021 • 27.5 % • 23 % / 27.5 % for holding structures • swaps are free • staking deferred, lending immediate • losses die at year-end • leaving Austria is a taxable event • DAC8 data from 2027



Crypto is International, Tax Law is Local

Liechtenstein



1. ...

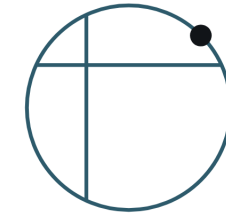
2. ...

3. ...

4. ...

5. ...





Sweden

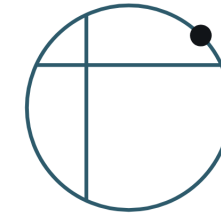


Main rules

Taxation of private individuals

- 30% flat rate tax on gains (no difference between long- and short-term gains)
- 70% deductibility on losses
 - Possibly 100% deductibility on losses from fiat denominated stablecoins (“E-money tokens”)
- For crypto asset denominated certificates, a private investment account (“ISK”) may be utilized by private individuals with unlimited tax liability in Sweden – simplified tax regime (directly owned crypto assets not eligible)





Sweden



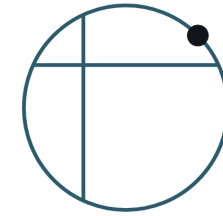
Business income tax rules (individuals)

- 30-55% tax rate on gains (no difference between long- and short-term gains)
- Social security benefits payment of 28.97% (deductible)
- In some cases up to 25% VAT
- 70% deductibility on losses (possibly 100% for E-money tokens)
 - Exception: 100% deductibility if the business constitutes a sole trading business due to extensive trading of crypto assets

Business income tax rules (Corporations, “AB”)

- 20.6% flat corporate tax rate on gains (no difference between long- and short-term gains)
- 20-55% tax on dividends distributed to private shareholders
- In some cases up to 25% VAT
- 100% deductibility on losses





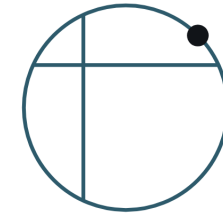
Sweden



General recommendations

- When a corporation starts handling crypto assets, always start with a previously unused wallet
- When filing an income tax return, provide a report to the Swedish Tax Agency explaining how and why the company's crypto asset related activities have been treated a certain way in the income tax return
- DAC8 income statement: Go through thoroughly to avoid trading platforms sending incorrect transaction data to the Swedish Tax Agency
- Access to qualitative data is key. AI is increasingly useful in handling vast amounts of complex transaction data on the blockchain





Sweden



Helm Tax – Who we are

Stockholm based tax advisory firm, primarily working with mid/large corporate clients and HNWI

Senior expertise throughout all assignments

Agile, understandable and pragmatic advice tailored to your needs

Many years of expertise working with Swedish and international crypto asset taxation

- Example: Set the precedent in Sweden for how to tax NFT:s
- Example: Helped companies with tax and accounting treatment of crypto related financial instruments, e.g. perpetual futures and fiat denominated stablecoins (“E-money tokens”)
- Example: Helping clients with tax issues surrounding setup of liquidity pools



