

# 金融服務業比較稅制

--以營業稅為例

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The Comparative Taxation of Financial Services
---Business Tax
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# 大綱 Outline

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# 壹、我國金融業營業稅 重要沿革

Legislative History of Business Tax of Financial Industries





# 一、新制營業稅實施前

- ◆金融業在民國20年已納入課稅(adopted in 1931) 且其稅率較一般業別為高。
- ◆各業採總額型課稅方式(multiple-stage gross base) 應納稅額=銷售額米稅率

Business tax was first adopted in the R.O.C. in 1931 as a multiple-stage gross business receipt tax. The financial sector has been subject to the business tax, and always apply higher tax rate than other industries.



# 二、75年實施新制營業稅時

- ◆金融業維持採總額型(非加值型)課稅
  - ▶理由:加值額不易計算 (difficult to calculate the amount of VAT)
- ◆稅率:5%
  - ▶理由:維持改制前稅收水準 (maintain tax revenue level)

In 1986, we implemented value-added tax system. In consideration of the special nature of the financial industries, which were difficult to calculate the amount of Added Value, thus retained the business tax levied based on total sales according to the original system, and the tax rate was set at 5% so as to maintain tax revenue level before tax reform.



# 三、88年7月調降金融業營業稅稅率

- ◆88年7月1日起將銀行業、保險業等金融業經營專屬本業銷售額適用之稅率,由5%調降為2%。
- ▶理由:因應本土型金融風暴(to address financial crisis) 並發展我國成為亞太金融中心

措施		稅收影響	
88.7起 調降稅率 (5%→2%)	調降相當金額(3%)部分 用以打銷呆帳	減少稅收約新臺幣4,600億元 (102年12月止)	

Since 1 July 1999, for core business of the financial industries, the applicable business tax rate was reduced from 5% to 2%, the reduction of the tax amounting to NT\$ 460 billion was used to assist write off bad debts of the financial industries.



## 四、91年起金融業營業稅稅款專款專用 Earmarked tax since 2002

◆ 91年1月至102年12月止,已挹注新臺幣 2,998億元

期間	稅款類別	撥供	合計
91年~99年	專屬本業2% 非專屬本業5%	行政院金融重建基金 (簡稱RTC)	至 <b>102.12</b> 止 已挹注新臺
100年~ 103年6月	專屬本業2% 非專屬本業5%	銀行業稅款撥入存保賠款特別準備金;銀行業以外金融業稅款撥入金融業稅款撥入金融業特別準備金	幣2,998億元

Since 2002, the business tax revenue from the financial industries (included banking and insurance industry) among to NT\$ 299.8 billion was earmarked to help tackle the problems of institutions (both banking and insurance).



# 貳、國際改革趨勢

**International reform trend** 







# 一、早期發展(early development)

- ◆國際間對金融業主要金融勞務(core financial services)免徵加值稅,但基於特殊政策目的除課徵監理費、特許費外,另課徵特別稅費,如:英國、法國、德國等另課徵保險費稅。
- ◆ 美國伊利諾州及肯德基州也有課徵 保險費稅情形。



# 二、近年發展趨勢(recent trend)(1/4)

國際間於金融危機發生後,歐美各國為使金融部門得以回饋(feedback)政府解決危機所投入之國家財政資源,多對金融機構加徵稅負,如課徵銀行稅(Bank Tax/Bank Levy)。



# 二、近年發展趨勢(recent trend)(2/4)

## 美國(United States)

預定自2015年起對總資產超過500億美元(約新臺幣1兆5,000億元)之大型金融機構(包括銀行、保險公司及證券商等)課以金融危機責任費 (Financial Crisis Responsibility Fee)。



# 二、近年發展趨勢(recent trend)(3/4)

# 韓國(Korea)

為避免跨境資本流動過劇,並促使銀行降低對短期外債借款之依賴程度,自2011年8月起課徵總體監理穩定稅(Macroprudential Stability Levy)。





# 二、近年發展趨勢(recent trend)(4/4)

## 歐盟國家(EU countries)

國家	稅費名稱	對象	每年 預估稅收	實施日
英國 (United Kingdom)	銀行稅 (Bank Levy)	銀行、金融集團、合作組織等	25億英鎊	2011.1.1
法國 (France)	銀行稅 (Bank Levy)	信貸機構、投資公司、 銀行控股公司等	8億歐元	2011.1.1
德國 (Germany)	銀行稅 (Bank Levy)	銀行	5億歐元	2011.1.1
荷蘭 (Netherlands)	銀行稅 (Bank Tax)	銀行	n.a.	2012.10.1



# 叁、本次修法背景及內容

**Background and Contents of Amendment** 







- (一)推動財政及租稅改革使經濟永續發展 (Fiscal and tax reform for economic restructuring)
  - ◆ 國際因素-金融危機及歐債危機-影響全球經濟
  - ◆ 國內因素-財政赤字及國債攀升-影 響財政健全
  - ♦ International aspect—the aftermath of the global financial crisis and the European sovereign debt crisis
  - Domestic aspect—outstanding debt approaching statutory debt ceiling



### (二)銀行業保險業等體質已趨健全



It has effectively resolved our financial crisis, and the constitution of the banking and insurance industries have been gradually strengthened.



#### 本國銀行近年稅前損益 單位:新臺幣 億元

稅前		較上年		
損益   年度	金額	增減數	增減%	
100	2,000.1	_		
101	2,401.8	401.7	20.08	
102	2,576.48	174.68	7.27	

#### 保險業近年稅後損益 單位:新臺幣 億元

稅後	金額	較上年		
損益 年度		增減數	增減%	
100	80.77			
101	447.01	366.24	453.4	
102	755.46	308.45	69	

# 二、修法內容(contents)

對 象	銷售額種類	稅率
銀行業	經營銀行、保險本業銷售額	2% <b>→</b> 5%
保險業	其餘銷售額	不變
其他金融業	銷售額	不變

- 調增稅率3%所增加之稅收189億元,由國庫統收統支,其餘稅收仍維持專款專用,撥入金融業特別準備金至113年 12月31日止。
- ◆ 114年起全部金融業營業稅稅款納入統收統支後,國庫每 年約可再增加231億元。

We have adjusted the business tax rate of the banking and insurance industries for their core business of banking and insurance from 2% back to the original 5% which was levied before the local financial crisis of 1999 in order to allow for feedback to the society from a small number of profitable industries so as to inject impetus for the social development forward.



# 肆、我國金融業營業稅稅制 與國外相較

Compare with Foreign Financial Sector Taxation



# 一、課徵方式之差異

(comparative tax treatment)

項目類別	課稅	銷售額種類	稅率	進項稅額
我國	一一加伯兀!	專屬本業	<b>5%, 2%</b>	不得扣抵
其他多		非專屬本業(註)	5%	不得扣抵
要實施 數實施 加值稅 國家		主要金融勞務	<b>免稅</b> ————	不得扣抵
		次要金融勞務	10%以上	可扣抵

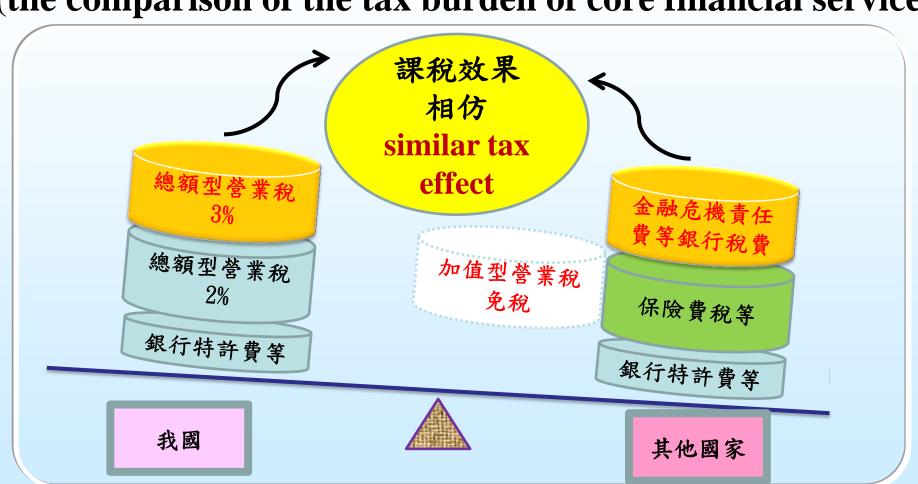
註:銀行業保險業信託投資業就其經營非專屬本業銷售額部分可申請按營業稅法第4章第1節規定(按加值型)計算營業稅額。

In most countries which implement value-added tax system, although the core financial services are exempted from the value-added tax, the input tax is not deductible.



# 二、主要金融勞務稅費之比較

(the comparison of the tax burden of core financial services





## 三、金融業租稅負擔之相較 (the comparison of the tax burden)

- ◆ 外國金融業購買貨物或勞務之進項稅 額比我國為高;
- ◆ 次要金融勞務尚無免稅;
- ◆ 公司所得稅稅率均在17%以上。

是以,我國金融業營業稅稅負未必較國

## 外為重。

However, the value-added tax rate of the countries is more than 10% (the average tax rate is over 19% in European countries), so as to the input tax in purchasing goods or services for foreign financial industry is higher than that of Taiwan, in addition, there is no tax exemption for minor financial services, and the corporate income tax rates are above 17%. According to a study in 2006, the business tax burden of our financial industry is not heavier than that of foreign countries.



# 伍、結語

**Conclusion** 



金融穩定 (financial stability)

金融業營業稅之 改革

(business tax reform)

財政穩健

(financial soundness)

經濟發展 (economic development)





# 謝謝聆聽 Thank for Your Attention

