ОБЛІК І ОПОДАТКУВАННЯ

UDC 336.225:657:339.5:004.7
DOI https://doi.org/10.31359/2312.394X.2026.39.1.101

TOKENS IN INTERNATIONAL TRADE: ACCOUNTING IDENTIFICATION OF DIGITAL ASSETS AND TAX BASE FRAGMENTATION

S. Semenova

The article is devoted to the study of the role of tokens and digital assets in the transformation of international trade. An approach to the accounting identification of digital assets and the classification of tokens into those that provide access to services, as well as those that have or do not have economic benefits, is substantiated, which allows reducing the fragmentation of the tax base and enhancing the consistency of accounting and taxation in cross-border transactions.

Keywords: *tokens, digital assets, accounting identification, international trade, accounting, tax base fragmentation, taxation of digital assets, tokenization, IFRS, cross-border transactions.*

ТОКЕНИ В МІЖНАРОДНІЙ ТОРГІВЛІ: ОБЛІКОВА ІДЕНТИФІКАЦІЯ ЦИФРОВИХ АКТИВІВ ТА ФРАГМЕНТАЦІЯ ПОДАТКОВОЇ БАЗИ

С.М. Семенова

У статті досліджено теоретичні та прикладні аспекти використання токенів у міжнародній торгівлі з акцентом на облікову ідентифікацію цифрових активів та наслідки для формування податкової бази. Проаналізовано економічну сутність токенів як цифрового представлення прав вимоги, доступу або участі, що функціонують у децентралізованих інформаційних системах і розширюють традиційні механізми обміну в транскордонних операціях. Визначено співвідношення між категоріями «токени» та «цифрові активи», що дозволило уточнити об'єкт дослідження в контексті сучасних фінансових і торговельних відносин. Охарактеризовано проблемні аспекти фрагментації податкової бази, яка виникає внаслідок багатокомпонентної природи токенів, через використання в різних юрисдикціях та відсутність уніфікованих підходів до обліку й оподаткування.

Доведено, що невідповідність між економічною сутністю й визнанням токенів як об'єкта бухгалтерського обліку та оподаткування зумовлює необґрунтованість оцінок, ризики подвійного оподаткування або втрати податкових надходжень. У результаті дослідження систематизовано підходи

до класифікації токенів відповідно до міжнародних стандартів фінансової звітності та нормативних документів, що регулюють обіг цифрових активів. Узагальнено підхід до облікової ідентифікації токенів, який базується на принципі превалювання економічної сутності над юридичною формою, передбачає послідовне узгодження облікового відображення з визначенням об'єкта оподаткування та враховує особливості міжнародних токенізованих операцій.

Практичне значення полягає в можливості покращення облікової політики підприємств, підвищення прозорості фінансової звітності та мінімізації податкових ризиків у міжнародній торгівлі. Отримані результати також можуть бути застосовані під час розроблення нормативно-правових актів у сфері оподаткування цифрових активів та гармонізації національних стандартів з міжнародними.

Ключові слова: *токени, цифрові активи, облікова ідентифікація, міжнародна торгівля, бухгалтерський облік, фрагментація податкової бази, оподаткування цифрових активів, токенізація, МСФЗ, трансграничні операції.*

Problem statement. In the contemporary context of economic digitalization, tokens in international trade function as instruments for transforming cross-border transactions by enabling the digital representation of claims, assets, and financial instruments based on distributed ledger technology (DLT). Tokens, in the form of digital records, formalize rights to economic benefits and can be transferred between entities across different jurisdictions, thereby shaping new mechanisms for organizing international trade and financing trade operations [1]. In this context, the category of digital assets becomes particularly significant; these are understood as identifiable resources in digital form that possess economic value, are controlled by an entity, and are capable of generating future economic benefits in accordance with the criteria established by international financial reporting standards (notably IAS 38, IFRS 9) [2]. At the same time, the relationship between the concepts of "tokens" and "digital assets" is not identical. Not all tokens meet the asset recognition criteria, which necessitates their accounting identification as a process of determining economic substance and assigning them to appropriate accounting objects (intangible assets, financial instruments, inventories, etc.) [3]. The absence of unified approaches to such identification leads to inconsistencies in the accounting treatment of tokens and complicates the preparation of reliable and comparable financial information.

Under the influence of digitalization, the issue of tax base fragmentation in international trade is intensifying, manifesting in the allocation of value from tokenized transactions across multiple jurisdictions, digital platforms, and economic agents. A mismatch arises between the place

where value is created and the place where it is taxed, complicating the determination of the tax base and increasing the risks of both double taxation and tax avoidance [4]. The decentralized nature of token circulation, the variability of their legal qualification [5], and the lack of harmonized international approaches to the classification of digital assets further exacerbate these challenges.

The relevance of the study is reinforced by the rapid growth of the digital asset market and the faster development of their practical use compared to the regulatory framework. In the EU, as of 2025, more than 65% of crypto companies have achieved compliance with MiCA regulatory requirements, while approximately 85% of crypto service providers have been registered with national financial authorities. Over 70–92% of crypto transactions are already conducted through regulated platforms, and more than 78% of stablecoins comply with reserve and reporting requirements [6], indicating increasing transparency and controllability of cross-border operations. At the same time, within the EU, the formation of a unified regulatory framework is accompanied by the persistence of differences in national approaches to taxation and accounting, which leads to additional compliance costs and stimulates regulatory arbitrage. At the global level, this is further intensified by the fact that the capitalization of stablecoins alone has exceeded $230 billion [6], enabling rapid cross-border settlements without traditional intermediaries, which complicates tax identification of transactions and control over the formation of the tax base.

For Ukraine, these issues are of particular importance in the context of integration into the European economic space and the development of the digital economy. The growing use of digital assets in cross-border transactions is combined with incomplete regulatory frameworks and insufficient harmonization with European standards. The inconsistency between the economic substance of token-based transactions and their accounting treatment increases the risks of tax base fragmentation, potential losses of budget revenues, and complicates integration into the common digital financial space.

Analysis of recent research and publications. The analysis of academic sources indicates the formation of a comprehensive approach to the study of tokens in international trade, integrating legal, economic, and accounting dimensions. Thus, Freni P., Ferro E., and Moncada R. [7] propose a functional-economic classification of tokens. Garrido J. [8] and Annunziata F. [9] examine the legal nature of tokens and the relationship between crypto-assets and financial instruments. In their studies, Bocchini R. [10], Alaimo C., and Kallinikos J. [11] emphasize the role of digital platforms and data in transforming market relations. At the same time, Fomina O. [12] addresses

the ethical aspects of accounting for digital assets, while attention is also given to the formation of accounting policies [13] under the influence of evolving regulatory frameworks, particularly the Markets in Crypto-Assets Regulation (MiCAR) in the European Union. Helmi I. and Maulin M. [14] further extend approaches to the use of crypto-assets by incorporating regional specificities.

In the field of accounting and taxation, fragmentation of approaches is observed, as the Organisation for Economic Co-operation and Development (OECD) [1, 4] emphasizes the need for the standardization of tax reporting, while International Financial Reporting Standards (IFRS, IASB) [2] leave issues of token classification unresolved. Ukrainian scholars, including Kovalevska N., Nesterenko I., Ostapenko R. [15], Hrosul V., Kolesnyk A. [16], Chyzhykov V. [17], Moshkovska O. [18], Myskin Y., Kraevskyi V., Kiselova A. [3], Blynov V., Cherep O. [19], Slatvinska V., Demchenko V., Tretiak K., Hnatyuk R., Yarema O. [20], as well as Korol S. and Romashko O. [21], highlight the impact of digitalization, blockchain technologies, and artificial intelligence on the transformation of accounting, international settlements, and the formation of the tax base. The generalization of existing approaches confirms the absence of a unified model for the accounting identification of tokens and underscores the relevance of studying their classification in order to reduce fragmentation of the tax base in international trade.

Purpose of the article. The aim of the article is to develop a theoretical and methodological approach to the accounting identification of digital assets represented in the form of tokens in international trade, in order to overcome tax base fragmentation and ensure consistency between accounting and taxation.

Presentation of the main research material of the study. Digital assets, as an element of the digital economy, form a new paradigm for the development of international trade by transforming traditional mechanisms of exchange, financing, and accounting for business transactions. Their impact on the globalization of trade is manifested through a set of interrelated economic, technological, and institutional effects. Blockchain technology provides a decentralized infrastructure for executing transactions, enabling the minimization of costs and reducing the role of traditional financial intermediaries in international trade, such as banks and payment systems. Digital assets operate within a global decentralized environment that is not tied to national currencies or jurisdictions. As a result, cross-border transactions can be carried out without currency restrictions, dependence on national financial systems is reduced, and market entry for enterprises is facilitated.

The digital asset market is viewed as a global ecosystem that integrates various participants, asset types, and transactions regardless of geographical boundaries. The transformation of international settlements through cryptocurrencies enables near-instant transactions, allows payments to be conducted on a 24/7 basis, reduces currency risks and conversion costs, enhances liquidity in global markets, and supports the development of international e-commerce.

The use of distributed ledger technology (DLT) in trade ensures traceability of goods flows, data immutability, and transactional transparency, which is particularly important for global supply chains characterized by information asymmetry and a lack of trust between counterparties. Blockchain contributes to enhancing supply chain management efficiency, reducing fraud, and improving coordination among participants in international trade.

Digital assets facilitate the democratization of access to capital and strengthen the participation of new actors in international trade. Asset tokenization, Initial Coin Offerings (ICOs), and decentralized finance (DeFi) instruments create alternative mechanisms for capital raising and expand financing opportunities for small and medium-sized enterprises that previously had limited access to global financial resources.

The key concept lies in identifying the economic source of income, which serves as the fundamental unit for determining the taxable object. This refers to the primary business transaction associated with the supply of goods, provision of services, or transfer of assets that generates economic benefit. All subsequent token-related operations, including their division, transfer, or recirculation, should be treated as derivatives of this transaction and should not constitute an independent taxable object. Such an approach is consistent with the requirements of IFRS 15 [2] regarding revenue recognition based on the transfer of control over goods or services. Tokenization conditions allow for the division of an asset into multiple units that may circulate independently, resulting in a multiplicity of transactions and potential erosion of the tax base. It is essential to aggregate such transactions based on criteria of economic homogeneity, a common source of income, and affiliation within a single contractual or functional environment. Under these conditions, a consolidated tax base is formed, reflecting the actual amount of value created.

As of January 1, 2026, a number of jurisdictions have begun implementing the Crypto-Asset Reporting Framework (CARF) [1], developed by the OECD, which establishes an obligation for Crypto-Asset Service Providers (CASPs) to systematically disclose user transaction information to tax authorities [5]. The introduction of this framework reflects a transition to a qualitatively new level of global tax transparency in the

sphere of digital asset circulation and is aimed at minimizing the risks of tax evasion in the context of the digitalization of international trade.

A key element of CARF is the establishment of standardized reporting requirements for crypto-asset transactions, including their purchase, sale, exchange, and other forms of transfer of economic benefits. This approach enables tax authorities to obtain a comprehensive view of transactions within the digital asset segment, which is characterized by a high degree of decentralization and limited transparency [4]. In the European Union, the implementation of these approaches is carried out through the DAC8 Directive, which harmonizes the rules for the automatic exchange of tax information on crypto-assets among Member States. The first reporting period covers transactions conducted in 2026, effectively integrating the digital asset market into the pan-European system of tax control.

An important feature of the current stage of regulatory development is the expansion of the reporting perimeter, which includes not only centralized platforms but also new forms of interaction, particularly transactions in the DeFi sector. Updated OECD guidance on the application of CARF and its interaction with the Common Reporting Standard (CRS) further specifies requirements for participant identification and transaction classification in such environments. The implementation of CARF and related regulatory initiatives establishes institutional preconditions for aligning accounting and tax approaches to the identification of tokens in international trade. Regulatory efforts are aimed at ensuring that the development of digital asset markets does not lead to a loss of tax transparency and administrative efficiency, thereby necessitating a clear determination of their economic substance and their appropriate classification within accounting frameworks.

Since there is no specific accounting standard or universally established accounting classification for digital assets, their recognition depends on their economic role in an entity's operations. According to the position of the IFRS Interpretations Committee [2], holdings of cryptocurrencies generally meet the definition of an intangible asset under IAS 38, as such assets are identifiable and do not provide a right to receive a fixed or determinable amount of cash. If digital assets are held for sale in the ordinary course of business, IAS 2 applies. For broker-traders, measurement at fair value less costs to sell is required. Thus, the same economic substance may be recognized differently in financial statements depending on the business model, which significantly increases the importance of professional judgment [12].

If digital assets are recognized as inventories or intangible assets, the entity must comply with disclosure requirements under IAS 2, IAS 38, IFRS 13 [2]. This implies the need to document management judgments, valuation

techniques, risks related to changes in fair value, and subsequent events where material. In international trade, this is particularly important, as digital assets may change value rapidly between the delivery date, settlement date, and reporting date, thereby affecting the reliability of financial results and the comparability of financial statements across entities in different jurisdictions.

Since cryptocurrencies are not recognized as cash under IAS 32 [2] and are not financial assets in the traditional sense, their use in settlements does not eliminate the need to separately identify the exchange transaction, the economic substance of the consideration transferred, and the timing of transfer of risks and rewards. For international trade, this means that accounting should distinguish three dimensions: (1) accounting for the digital asset itself, (2) accounting for the goods or services paid for, and (3) accounting for exchange differences. At the same time, the principle of substance over form, as required by the Conceptual Framework for Financial Reporting [2], must be applied. Therefore, it is important to move away from identifying the taxable object as a separate transaction or token and instead consider it as an integrated set of interrelated transactions that form a single economic outcome within international trade activities. This approach makes it possible to overcome the limitations of the traditional taxation model, which does not account for the fragmented nature of digital assets.

The relationship between tokens and digital assets can be characterized as follows (Fig.): some tokens qualify as digital assets if they meet the asset recognition criteria under IFRS, while others do not qualify as digital assets because they do not provide economic benefits or are not controlled by the entity, and their economic role is auxiliary.

Digital assets may exist beyond a tokenized form, in particular as electronic data, digital rights, or other intangible resources that do not rely on distributed ledger technology. This indicates that tokenization is only one method of digital representation of assets and does not exhaust the scope of the digital asset category.

Thus, only a token that:

- represents an economic or property right;
- can circulate or be transferred across jurisdictions;
- generates economic benefit for the holder or user is considered a digital asset.

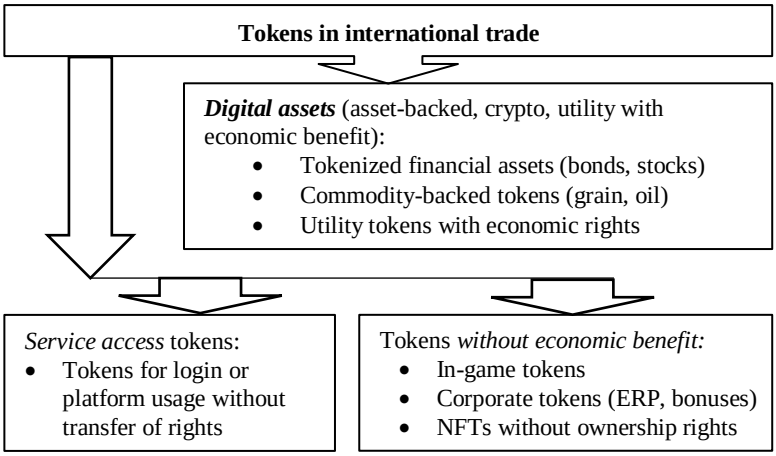

Fig. Differentiation of Tokens in International Trade for Accounting and Taxation Purposes, *prepared on the basis of* [1, 2, 7]

Tokens that do not meet at least one of these criteria are not classified as digital assets and, accordingly, are not subject to accounting or taxation in international trade transactions. This distinction enables a clear determination of the tax base and the proper recognition of tokenized assets in accounting. In international trade, such differentiation is of fundamental importance, as the correct identification of a token as a digital asset determines its treatment in financial reporting and its inclusion in the tax base.

A classification of tokens in international trade is proposed in Table. Criteria are defined under which tokens may be recognized as digital assets for accounting and tax administration purposes, systematically distinguishing them based on the presence of economic benefit, property rights, and functional purpose within international economic circulation. The proposed systematization reduces ambiguity in cases where the same transaction may be interpreted differently across jurisdictions and mitigates the risk of tax base fragmentation.

In contrast to existing legislative and academic approaches, in particular those established in Markets in Crypto-Assets Regulation, the documents of the Financial Conduct Authority, and analytical frameworks developed by the International Monetary Fund and the Organisation for Economic Co-operation and Development, where token classification is primarily based on legal nature or regulatory status, the proposed approach is grounded in the primacy of economic substance and functional purpose

within international economic circulation. This makes it possible to integrate into a single analytical framework tokens with economic value that serve as objects of financial transactions, tokens without economic benefit, and tokens that perform exclusively a service-access function, thereby ensuring their consistent interpretation in the context of international trade, accounting, and taxation.

Table – **Classification of Tokens in International Trade**

Token category	Characteristics	Is it a digital asset	Examples	Explanation for international trade
Digital assets (asset-backed, crypto, utility with economic benefit)	Tokens representing real or financial assets, may circulate in international transactions and possess economic value	Yes	Tokenized bonds, security tokens, commodity-backed tokens (grain, oil), utility tokens with economic rights	May serve as objects of accounting and taxation, aligned with IFRSs, MiCAR, and OECD. Used in international trade and financial transactions
Tokens without economic benefit	Digital tokens without market value or asset rights, not tradable on markets	No	In-game tokens, corporate bonus tokens, decorative NFTs without ownership rights	Not subject to accounting or taxation, do not form a taxable base
Service access tokens	Tokens that grant only access rights to a platform or service, without property or ownership rights.	No	Tokens for access to closed platforms, services, online courses, or webinars.	Used solely as access rights, not treated as taxable or accounting objects in international transactions.

Source: prepared on the basis of [1, 2, 7]

The proposed classification addresses the fragmentation of existing approaches, which is manifested in the absence of unified criteria for recognizing tokens as objects of accounting and taxation in cross-border transactions. Its practical relevance is defined by its applicability for compliance, financial reporting, tax planning, and legal qualification of token-related transactions, particularly in accordance with IFRSs and transparency and information exchange frameworks developed by the OECD. For Ukraine, the proposed approach is of particular importance in the

context of developing a national regulatory model for digital assets, as it contributes to the harmonization of accounting and tax practices with international standards, reduces regulatory uncertainty in cross-border transactions, and enhances the investment attractiveness of the digital economy sector.

Conclusions. As a result of the study, it has been established that the global nature of digital assets necessitates the unification of approaches to their legal status, the harmonization of tax systems, and the strengthening of international cooperation, thereby contributing to the institutionalization of the global economy and the formation of a single digital market. Digital assets transform international trade not only as a payment instrument but also as a factor driving profound changes in accounting and tax practices. Existing accounting standards require clear identification and classification of assets, appropriate valuation approaches, and enhanced disclosure requirements in financial reporting. The taxation of transactions involving digital assets faces challenges related to determining the tax base, tax jurisdiction, and the control of cross-border transactions, which underscores the need for coordinated international approaches.

It is substantiated that digital assets act simultaneously as a catalyst for globalization and as a source of new regulatory risks, resulting in an ambivalent impact on the development of international trade. The proposed classification of tokens based on the criterion of economic substance and mode of use defines an approach that enables overcoming the fragmentation of accounting identification and taxation in cross-border operations, ensuring a clearer distinction between objects of financial reporting and taxation. This provides an analytical foundation for improving compliance efficiency, reporting transparency, and the consistency of tax regulation in international trade.

Future research should focus on the development of flexible methodological approaches to the valuation of tokenized assets, the improvement of disclosure requirements in financial reporting based on taxonomy, and the deepening of international coordination in the tax regulation of digital assets.

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Semenova Svitlana, PhD in Economics, Associate Professor, Associate Professor at the Department of Accounting and Taxation, State University of Trade and Economics; e-mail: s.semenova@knute.edu.ua; ORCID https://orcid.org/0000-0001-7250-7482

Семенова Світлана Миколаївна, канд. екон. наук, доцент, доцент кафедри обліку та оподаткування, Державний торговельно-економічний університет; e-mail: s.semenova@knute.edu.ua; ORCID https://orcid.org/0000-0001-7250-7482

Отримано: 01.04.2026. Прийнято: 13.04.2026. Опубліковано: 20.05.2026.

УДК 657:004.8:005.5:330.34
DOI https://doi.org/10.31359/2312.394X.2026.39.1.113

ІНТЕЛЕКТУАЛІЗАЦІЯ ТА ШІ-ОРІЄНТОВАНА ТРАНСФОРМАЦІЯ ОБЛІКОВО-АНАЛІТИЧНИХ ДАНИХ У СОЦІАЛЬНО-ЕКОНОМІЧНИХ СИСТЕМАХ ПІДПРИЄМСТВ

І.В. Нестеренко, Н.С. Ковалевська

У статті досліджено теоретико-методологічні засади інтелектуалізації обліково-аналітичних даних у соціально-економічних системах підприємств. Обґрунтовано необхідність переходу від традиційної моделі інформаційного забезпечення до ШІ-орієнтованої архітектури управління даними, здатної забезпечувати їх інтеграцію, інтерпретацію, адаптивне опрацювання та прогностичне використання. Розкрито напрями підвищення аналітичної цінності даних на основі інтелектуальних алгоритмів, автоматизованого виявлення закономірностей та підтримки управлінських рішень.

Ключові слова: *облік, аналіз, штучний інтелект, інтелектуалізація управління, інформаційне забезпечення, соціально-економічна система підприємства, цифрова трансформація.*