家族辦公室

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

我們的家族辦公室應直接持有加密資產，還是透過公司或基金持有？如家族成員屬私人投資者，在瑞士直接持有的稅務狀況最簡單，因為收益免稅，只須繳付財富稅。如家族辦公室設於新加坡，並希望取得第13O條或第13U條稅務優惠（該優惠豁免來自指定投資（包括數碼資產）的指明收入），則應透過新加坡公司或可變資本公司（VCC）持有。如有數個家族分支享有不同權益，或將接納第三方資本，則應在其中一個國家透過基金持有。架構取決於家族的居住地，這是首先要解決的問題。[1]

哪些私人銀行會為我們保管加密資產？在瑞士，加密資產銀行（Sygnum、AMINA）、數家州立銀行（包括蘇黎世州立銀行、琉森州立銀行及聖加侖州立銀行等）、PostFinance及越來越多私人銀行，提供比特幣、以太幣及少數其他資產的保管及交易服務。在新加坡，星展銀行（DBS）透過其數碼交易所向認可投資者提供保管及交易服務，另有數家私人銀行透過第三方託管人提供接觸渠道。名單每季都有變動，第P部分第IX章載有截至2026年年中的情況。[2]

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

我們的家族大家長獨自持有密鑰，應該怎麼辦？本月內便要處理，以免這個問題變成遺囑執行人要處理的問題。由單一人士控制密鑰，是家族財富永久損失最常見的成因。這亦是管治上的失誤，家族辦公室對任何其他資產類別都不會容忍。家族辦公室在實務上會採用三種方案。第一種是持牌託管人，配合多重簽署或多方計算（MPC）安排，由家族辦公室控制其中一條密鑰。第二種是自行保管安排，將密鑰分由三人持有，並設有恢復程序。第三種是由信託或基金會取得所有權，再委任專業託管人。第II章的遺產核對清單列出任何一種方案都必須附備的文件。[3]

我們可以把家族辦公室由新加坡遷往楚格，或由楚格遷往新加坡，而不產生稅務成本嗎？如加密資產的持有屬資本性質，家族辦公室公司本身通常可以遷冊或被取代，而不會就所持加密資產產生稅務成本，因為兩國均不對私人投資者的資本收益徵稅，而新加坡更完全不徵收資本增值稅。應課稅事件是個人的遷移：瑞士對離境居民徵收截至離境日期的所得稅，但不就未變現收益徵收離境稅；新加坡則把終止居民身份視為應課稅期間的結束，並對僱員實行清稅程序。瑞士的按開支課稅制度及新加坡的稅務優惠計劃均附有條件，遷移可能令條件不再符合，因此在作出決定前應就兩者進行模擬計算。[4]

我們怎樣證明2013年購入的加密資產的財富來源？重建整條鏈：以法定貨幣購入（銀行月結單；如交易所仍然存在，則為交易所紀錄）、接收該等加密貨幣的錢包地址、此後的鏈上轉移，以及由現時地址簽署、證明控制權的訊息。區塊鏈分析公司會出具財富來源報告，兩國的銀行均接受其為主要證據。如紀錄缺失，後備方案是附上尚存證據的宣誓聲明，銀行會根據事件的可信程度衡量其分量。購入時間越早，銀行越能接受紀錄上的缺口，前提是鏈上軌跡前後一致。[5]

我們的投資政策應如何處理加密資產？投資政策應列明獲准的資產類別及最高配置比例、獲批准的託管人，以及每個託管人的集中度上限。它應說明是否准許質押及其條款，並應禁止向平台借出資產及涉足去中心化金融

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

（DeFi），除非個別獲批准。它應訂明估值來源及頻率、對帳程序、任何自行保管的密鑰管理安排，以及向家族匯報的安排。第III章的意願書框架就受託人涵蓋相同範圍，可加以改編使用。[6]

註釋

1. 第P部分第VII章及第M部分第V章載列有關架構及條件。↩
2. 各銀行及其服務列於第P部分第IX章。↩
3. 第P部分第VIII章（繼承規劃）及第B部分第II章（保管模式）。↩
4. 第P部分第I章；第G部分第VI章；第M部分第V章。↩
5. 有關財富來源證據，參見第P部分第IX章及第F部分第III章。↩
6. 第P部分第VII章。↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.