新加坡可變資本公司

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

可變資本公司（VCC）是新加坡的基金載體，根據《2018年可變資本公司法》（Variable Capital Companies Act 2018）註冊成立並在會計與企業管制局（ACRA）登記。法律規定其須委任獲新加坡金融管理局（MAS）發牌或已登記的基金經理。[1]註冊成立本身十分迅速。時間表取決於基金經理的牌照狀況，以及基金開立銀行戶口及託管人接納客戶的程序。如申請稅務優惠，向MAS提出的第13O條或第13U條申請會另需數月。

階段	內容	所需時間	官方收費	專業費用
1	架構：獨立或傘子式可變資本公司、子基金、經理、託管人、行政管理人、核數師	3至6星期	無	20,000至50,000新加坡元
2	基金經理：現有持牌／已登記經理，或新申請（見下文）	0或6至12個月	新經理須繳付MAS費用	新申請資本市場服務牌照（CMS牌照）60,000至150,000新元
3	章程、發售文件、認購文件、服務協議	4至8星期	無	40,000至100,000新元

© 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.

階段	內容	所需時間	官方收費	專業費用
4	在ACRA註冊成立可變資本公司	1至2星期	註冊費8,000新元；每個子基金400新元（參考數字）	—
5	銀行戶口、數碼資產託管人接納客戶程序、設立行政管理安排	6至12星期	無	託管人接納客戶費用不一
6	向MAS申請稅務優惠（第13O條／第13U條）	2至4個月	無	15,000至30,000新元
7	推出、首次截止認購、持續合規及年度審計	持續	ACRA年度申報表費用	行政管理及審計每年60,000至150,000新元

瑞士經理如欲設立新加坡可變資本公司，必須取得新加坡基金管理牌照，或委任一名新加坡持牌經理，再由該經理根據MAS的外判規則把組合管理轉授予瑞士實體。第二種途徑較快，通常四至六個月便可推出，亦是第P部分第VI章所述的常見模式。數碼資產符合稅務優惠計劃下指定投資的資格，但MAS在實務上會要求加密資產基金先提供詳細的保管及估值安排，才批出稅務優惠。

註釋

1. Variable Capital Companies Act 2018第15條及其後條文（註冊成立）及第46條（基金經理要求）；可變資本公司及其在數碼資產基金中的應用，於第M部分第IV章及第P部分第VI章討論。↩

© 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.

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 Law and regulation change frequently, so the content may be incomplete or outdated.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. 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