與楚格按開支課稅的比較

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新加坡家族辦公室經常與第G部分第VI章所述的瑞士按開支課稅（lump-sum taxation）制度相比較，儘管兩者建基於不同的邏輯。楚格為遷入居住但沒有在瑞士受僱的個人，提供按生活開支而非全球收入及財富課稅的方式，聯邦層面的最低稅基為40萬瑞士法郎，州層面的最低稅基更高。該人士每年繳付固定金額，可隨意存放其財富，沒有投放要求，亦沒有開支下限；如選擇經修改的按開支課稅，在大多數情況下可享有協定待遇。新加坡則向每名居民提供屬地稅制，沒有財富稅亦沒有資本增值稅，無須任何特別協議；並在此之上再加一層基金豁免，而該豁免以規模、人員、開支及本地投資為條件。[1]

比較項目	新加坡家族辦公室（第13O條／第13U條）	楚格按開支課稅
合資格人士	任何具備最低資產及人員的家族	沒有在瑞士受僱的外國人，首次遷入或離開10年後回流
每年稅項	獲豁免的基金收入無須課稅；管理公司利潤按17%課稅；薪酬的個人所得稅最高24%	按名義稅基繳付固定金額，在楚格一般為每年25萬至100萬瑞士法郎

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比較項目	新加坡家族辦公室（第13O條／第13U條）	楚格按開支課稅
財富稅	無	已包括在按開支課稅的稅基內
資本增值	如屬資本性質則無	私人財富的資本增值無論如何均獲豁免
質押及代幣收益	作為收入課稅，除非在獲豁免基金內並來自指定投資	由按開支課稅涵蓋，但須受控制計算規限
所需本地投資	管理資產的10%或1,000萬新加坡元	無
所需員工	2至3名投資專業人員	無
居留許可	受僱的家族成員申請就業准證（EP）；永久居民身份透過GIP	B類居留許可，5年或10年後可取得C類居留許可
繼承	沒有遺產稅	沒有聯邦遺產稅；楚格對直系後裔不徵收
協定待遇	新加坡居民可享有	部分協定需要經修改的按開支課稅

對一個擁有1億新加坡元、其中一半為代幣的家族而言，如家族希望透過某個結構繼續積極交易或質押，計算結果對新加坡有利。新加坡的豁免吸收指定投資部分的收入，而個人持有的資產則完全無須課稅。如家族希望只作單一、可預計的付款，不需員工，亦沒有投放要求，或家族財富主要是永遠不會符合指定投資資格的代幣，則計算結果對楚格有利。瑞士的財富稅原本會是決定性的反對理由，但已被吸收到按開支課稅之內。實務上，決定取決於家族希望在哪裏居住；第P部分第I章把這視為首要問題，稅務計算則屬次要。

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楚格視角

選擇楚格的家族，可把代幣自行保管或存放於瑞士銀行，繳付經協商的按開支課稅金額；除控制計算外，每年並無其他合規要求。控制計算用以確認按開支課稅金額超過瑞士來源收入及享有協定寬免的收入所應繳的稅款。選擇新加坡的家族則要建立一個組織。兩者均可行。新加坡途徑適合下一代將在亞洲經營投資業務的家族。楚格途徑則適合財富已經累積、希望以最少結構保存財富的家族。

註釋

1. Direct Federal Tax Act (DFTA; DBG)，SR 642.11，第14條（按開支課稅；按指數調整的聯邦最低稅基40萬瑞士法郎）；Tax Harmonisation Act (THA; StHG)，SR 642.14，第6條。楚格州的實務見第G部分第VI章。 ↩

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