為何一本瑞士與新加坡的書要談香港

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客戶討論新加坡時最常提及的司法管轄區是香港，而瑞士私人銀行討論亞洲時最常提及的也是香港。半個世紀以來，兩個城市一直爭取同樣的委託。在數碼資產領域，這場競爭於2022年10月公開化：當時新加坡轉向限制不過數星期，香港政府便發表了有關虛擬資產的政策宣言。此後競爭持續，香港先後推出交易平台發牌制度、亞洲首批現貨比特幣及以太幣交易所買賣基金、一部穩定幣條例，並於2025年發表第二份政策宣言。創辦人選擇亞洲基地、家族辦公室選擇保管人，或瑞士銀行決定在何處為亞洲加密資產客戶入帳時，都會比較兩地。[1]

作者本身的背景為本章提供了特別的角度。他是香港執業律師（solicitor），在亞洲工作的十五年中，有部分時間在香港執業。他曾見過同一位客戶離開香港的會議，再走進新加坡的會議，提出同一個問題。這令他明白，正確答案幾乎從來不是「二選其一」。本章闡述香港截至2026年6月30日的制度，將之與新加坡和瑞士比較，並說明香港如何融入以楚格和新加坡為基礎的策略。

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註釋

1. Financial Services and the Treasury Bureau (FSTB), Policy Statement on Development of Virtual Assets in Hong Kong，2022年10月31日。FSTB, Policy Statement 2.0 on the Development of Digital Assets in Hong Kong，2025年6月26日。 ↩

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