# 對企業及專業人士的實務影響

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## 在新加坡規劃團隊

在新加坡組建團隊的金融機構，必須從一開始便考慮移民事宜。合資格薪金隨年齡遞增，決定每聘用一名外國人的最低成本。互補性評估框架（COMPASS）決定申請能否成功，而這在一定程度上取決於現有員工的組成。如公司的專業人員、經理、執行人員及技術人員（PMET）中某一國籍佔比偏高，再聘用該國籍人士時便會失去多元化分數。如公司本地PMET的比例低於所屬行業，則會在本地就業一項失分。這兩項條件只能隨時間逐步改善，因此員工規劃是一項策略性工作。

對單一家族辦公室及外部資產管理人等小型公司而言，這些規則有特別影響。PMET少於25人的公司，在多元化及本地就業兩項準則上預設各得十分。因此，公司必須從薪金和資歷，或從加分準則中取得其餘二十分。第E部分第III章所探討《所得稅法》第13O條及第13U條下的家族辦公室稅務優惠，亦對聘用投資專業人員訂有條件。因此，就這些架構而言，移民規劃與稅務規劃互相關連。基金經理及外部資產管理人的發牌制度要求具備勝任並居於新加坡的員工，第E部分第V章對此有所探討。

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對個別專業人士而言，本章所述規則意味着在新加坡發展事業須持續注意資歷。沒有完成每年CPD時數的代表不能繼續為客戶提供意見，而未取得CACS的私人銀行家則不能服務私人銀行的客戶。外國專業人士如在續期時薪金低於不斷提高的門檻，可能會失去其准證。有意定居者應及早規劃申請永久居民身份，因為批准與否屬酌情決定，並可能需時。

## 企業核對清單

- 按年齡及行業確定每名外國聘員的合資格薪金，並留意自2027年1月1日起新申請及自2028年1月1日起續期的門檻上調。
- 在發出聘用要約前計算COMPASS分數，包括公司層面的多元化及本地就業準則，並查核該職位是否列於短缺職業清單（Shortage Occupation List）。
- 查核候選人是否因每月固定薪金最少22,500新加坡元、公司內部調派或短期派駐而獲豁免COMPASS。
- 在有需要時按公平考慮框架（Fair Consideration Framework）刊登職位廣告，並記錄對本地候選人的評估。
- 為《職場公平法》（Workplace Fairness Act）作好準備，檢討招聘、晉升及解僱程序有否涉及歧視，包括基於國籍的歧視。
- 核實每名代表符合《FAA-N26號公告》的最低入職要求或《證券及期貨法》下的相應要求，持有有效的CMFAS單元，並完成每年的CPD時數。
- 就私人銀行員工，核實其CACS認證及遵守《私人銀行操守守則》的情況。
- 善用IBF認證課程及轉業計劃，既可減低培訓成本，亦可展示對本地勞動力的承擔。
- 制訂繼任計劃，培養新加坡人擔任高級職位。對於受惠於金融中心的公司，MAS及人力部（MOM）對此的期望日益提高。

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- 檢討外國員工的住屋、子女教育及家屬准證安排，因為這些往往決定他們會否在首份合約期滿後留下。

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