雙語政策與華語作為商業資產：實務影響

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語言作為客戶資產與合規工具

對銀行、財富管理機構、家族辦公室和律師事務所而言，雙語政策造就了一支幾乎人人都說英語、許多人亦懂第二語言的勞動力。第二語言的水平參差不齊。部分員工能輕鬆閱讀中文法律文件。另一些員工聽得懂華語，卻不會書寫，而許多較年輕的新加坡華人使用英語比華語更自在。因此，倚重華語提供客戶服務或執行合規工作的機構，應明確評估員工的語言能力，避免從種族或教育背景推斷。

招聘時的語言要求必須有充分理據。《公平僱傭實踐三方指導原則》（Tripartite Guidelines on Fair Employment Practices）要求僱主只有在職位確有需要時，才在招聘廣告中列明語言要求，並須說明原因。[1]國會於2025年1月8日通過的《2025年職場公平法》（Workplace Fairness Act 2025），將就一系列包括語言在內的特徵，提供免受就業歧視的法定保障。該法於2026年9

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月尚未生效，預計於2027年底實施。[2]一家金融機構要求負責中國客戶的客戶經理懂華語，可以有充分理據。若對所有前線員工一概提出此項要求，則較難自圓其說。

中文、馬來文或印尼文（Bahasa Indonesia）文件在開戶及財富來源核實中佔重要地位。機構應清楚知道團隊中誰能閱讀這些文件、何時需要經認證的翻譯，以及翻譯如何記錄在客戶檔案中。在爭議中亦然：新加坡法院和仲裁庭以英語運作，關鍵文件的翻譯可能成為爭議焦點。

機構核對清單

- 以測試評估面向客戶及負責合規的員工的書面和口語能力，並記錄結果。不要從種族或教育背景推斷。
- 確定哪些客戶群需要華語、粵語、福建話、馬來語、印尼語或印度語言，並據此安排人手。
- 按照三方指導原則，以及《2025年職場公平法》生效後的規定，只有在職位確有需要時才在招聘廣告中列明語言要求，並說明原因。
- 確保用於財富來源核實的中文或其他語言文件由合資格員工閱讀，並在有需要時由認證翻譯員翻譯。
- 在文件和函件中，認清簡體字與繁體字之間的分別，以及內地、台灣和香港用語之間的分別。
- 以英語作為具約束力文件的語言，並記錄任何並行的中文版本，同時加入條款列明以哪一版本為準。
- 透過培訓、派駐中國或印尼，以及通商中國等機構提供的項目，投資於員工的第二語言能力。

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註釋

1. Tripartite Alliance for Fair and Progressive Employment Practices（TAFEP），Tripartite Guidelines on Fair Employment Practices，關於招聘廣告的指引："Mandarin-speaking"等語言要求只可在職位確有需要時列明，並須解釋原因。 ↩

2. Allen & Gledhill，"Workplace Fairness Bill passed in Parliament to protect employees from discrimination"，2025年1月23日，allenandgledhill.com（2026年11月瀏覽）：法案於2025年1月8日通過；受保障特徵包括年齡、國籍、性別、婚姻狀況、懷孕、照顧責任、種族、宗教、語言能力、殘疾及精神健康狀況，其中種族、宗教和語言歸為一組；Herbert Smith Freehills Kramer，"Workplace Fairness Act to take effect end of 2027"，2025年12月10日，legal500.com（2026年11月瀏覽）：該法"expected to come into force at the end of 2027"；第二項職場公平法案於2025年11月4日通過。 ↩

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