# 銀行保密對外國稅務機關的終結：摘要

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

新加坡《銀行法》第47條下的法定銀行保密，在2009年至2018年間對外國稅務機關失去效力，但仍繼續保障客戶免受私人披露。新加坡於2009年3月7日認可經合組織標準，並一度短暫列入灰名單，其後透過2009年及2013年的立法實施應要求交換資料：先是須取得法院命令，後來則無須法院命令。《海外帳戶稅收遵從法》（FATCA）根據2014年12月9日簽署的第一模式協議，帶來與美國的自動交換資料，並自2021年起成為互惠安排；共同匯報標準（CRS）則把自動交換擴展至約90個司法管轄區，首次交換於2018年9月進行。自2013年7月1日起，嚴重稅務罪行成為洗錢的上游罪行，MAS要求銀行拒絕或審查被懷疑持有故意或欺詐性逃稅（包括外國逃稅）得益的客戶。舊有資產透過對現有客戶的嚴格審查、適用於2013年7月1日所持資產的舉報責任，以及外國特赦計劃處理。新加坡既沒有本身的特赦，也沒有像日內瓦及其他瑞士金融中心那樣被施加美國和解計劃。

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 Law and regulation change frequently, so the content may be incomplete or outdated.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