家族办公室

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我们的家族办公室应直接持有加密资产，还是通过公司或基金持有？如果家族成员是瑞士的私人投资者，直接持有在瑞士的税务处理最为简单，因为资本利得免税，只需缴纳财富税。如果家族办公室设在新加坡，并希望享受第13O条或第13U条税收优惠（该优惠豁免来自指定投资（包括数字资产）的特定收入），则可通过新加坡公司或VCC持有。如果有多个享有不同权益的家族分支，或者需要引入第三方资本，则可在任一国家通过基金持有。架构取决于家族成员的居住地，这是需要首先解决的问题。[1]

哪些私人银行可以为我们托管加密资产？在瑞士，加密银行（Sygnum、AMINA）、若干州立银行（包括苏黎世州立银行、卢塞恩州立银行、圣加仑州立银行等）、PostFinance以及越来越多的私人银行，提供比特币、以太币以及有限的其他资产的托管和交易服务。在新加坡，星展银行通过其数字交易所为认可投资者提供托管和交易服务，另有几家私人银行通过第三方托管机构提供接入服务。这份名单每季度都会变化，第P部分第IX章介绍了截至2026年年中的情况。[2]

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我们的家族掌门人独自掌握密钥，应该怎么办？本月内就解决这个问题，不要等到它变成遗嘱执行人需要处理的问题。由一人控制密钥，是家族财富永久灭失最常见的原因。这也是一种治理缺陷，对于任何其他资产类别，家族办公室都不会容忍。家族办公室在实务中采用的方案有三种。第一种是由持牌托管机构采用多重签名或MPC安排，由家族办公室控制其中一把密钥。第二种是自行托管，将密钥分给三个人保管，并制定恢复程序。第三种是由信托或基金会取得所有权，并委任专业托管机构。第II章的遗产核对清单列出了上述任一方案都必须配备的文件。[3]

我们能否将家族办公室从新加坡迁往楚格（或反向迁移），而不产生税务成本？如果所持加密资产属于资本性质，家族办公室公司本身通常可以迁册或被替换，而不会就加密资产产生税务成本，因为两国都不对私人投资者的资本利得征税，而新加坡根本不征收资本利得税。真正的应税事件是个人的迁移。瑞士对离境居民就截至离境日的收入课税，但不对未实现收益征收离境税。新加坡则将居民身份终止视为应课税期间的结束，对雇员实行离境税务清算。瑞士的定额课税制度和新加坡的税收优惠计划都设有条件，迁移可能导致条件不再满足，因此在作出决定前应对两者进行测算。[4]

对于2013年买入的加密资产，我们如何证明财富来源？需要重建完整的链条：法币购买记录（银行对账单；如交易所仍然存在，还有交易所记录）、接收币的钱包地址、此后的链上转移记录，以及从当前地址发出的、证明控制权的签名消息。区块链分析公司出具的财富来源报告，两国的银行都接受为主要证据。如果记录缺失，退而求其次的办法是提交宣誓声明并附上现存证据，银行会结合事情经过的合理性加以衡量。取得时间越早，银行对缺漏的容忍度越高，前提是链上轨迹前后一致。[5]

我们的投资政策应如何规定加密资产？投资政策应列明允许投资的资产类别和最高配置比例、获批准的托管机构以及每家托管机构的集中度上限。它应说明是否允许质押以及条件如何，并应禁止向平台出借资产和参与DeFi，除

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非逐案获得批准。它还应确定估值来源和频率、对账程序、任何自行托管的密钥管理安排，以及向家族报告的方式。第III章的意愿书框架为受托人涵盖了相同的内容，可以加以改编。[6]

注释

1. 第P部分第VII章和第M部分第V章阐述了相关架构和条件。 ↩
2. 相关银行及其服务列于第P部分第IX章。 ↩
3. 第P部分第VIII章（传承规划）和第B部分第II章（托管模式）。 ↩
4. 第P部分第I章；第G部分第VI章；第M部分第V章。 ↩
5. 关于财富来源证据，见第P部分第IX章和第F部分第III章。 ↩
6. 第P部分第VII章。 ↩

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