通过公司持有

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

以瑞士控股公司持有个人数字资产，在税务上很少有优势。在楚格，公司须就已实现收益按略低于12%的税率缴纳利润税。股东随后须就股息缴纳所得税；对于持股至少10%的合格参股，联邦层面可减免30%，楚格州层面可减免50%。[1]综合税负高于私人持有人的零税负。尽管如此，如果持有人的活动在其他情况下会被认定为职业交易，人们仍会使用瑞士控股公司，因为公司的交易利润按公司税率课税，且股东可以控制派息时间。如果持有人希望将数字资产与个人财产分离以防范债权人，或者有多名家族成员共同持有，也会使用瑞士控股公司。

对新加坡居民而言，新加坡控股公司比瑞士控股公司对瑞士居民更具吸引力。公司无需就资本利得纳税；在单层制下，股息在股东手中免税；而且两个层面都不征财富税。[2]公司为家族提供了董事会、一套账目、以公司名义建立的托管关系，以及一个可以通过转让股份而非密钥来传承的载体。关于境外来源处置收益的第10L条规则仅适用于跨国集团的实体，因此没有境外子公司的单一家族新加坡控股公司不在其适用范围内。[3]其局限有两点。第一，公司的控制和管理必须在新加坡，对家族而言，这意味着至少有一名参与决策的居民董事。第二，公司自身的代币交易可能构成按17%课税的贸易活动。

© 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.

客户问题

“我住在楚格，持有约4000万瑞士法郎的比特币和以太币，都是2016年买入的。我想防范将来离婚带来的风险，并把这些资产传给子女。我应该把它们放进一家公司吗？”

瑞士公司会把免税的私人收益转化为应税的公司利润和应税股息，因此单从税务角度看，答案是否定的。就离婚保护而言，依《瑞士民法典》第247条订立采用分别财产制（Gütertrennung）的婚姻协议，比任何公司都能以更低成本保护您的资产。就传承而言，一份附有密钥管理机制的瑞士遗嘱，再加上（如果您希望子女分期获得资产）一个外国信托或列支敦士登的家族基金会，可以实现公司无法实现的目标。只有当您打算积极交易，或者希望让其他家族成员作为共同所有人加入时，公司才是正确的答案。

注释

1. DFTA, SR 642.11，第20条第1bis款（合格参股股息按70%部分课税）；Canton of Zug, Steuergesetz (BGS 632.1)，第19条第1bis款（50%）。参见第G部分第IV章。 ↩
2. Income Tax Act 1947，第44A条（单层制：股息在股东手中免税）及第13(1)(za)条（居民公司所付股息的免税）。 ↩
3. Income Tax Act 1947，第10L(1)条及第10L(2)条（适用于“相关集团”的实体，即在一个以上司法管辖区拥有实体的集团）。参见第M部分第II章。 ↩

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.

© 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.

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

© 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.