与楚格州定额课税的比较

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新加坡家族办公室常被拿来与第G部分第VI章所述的瑞士定额课税制度相比较，尽管两者建立在不同的逻辑之上。楚格州为在瑞士没有工作而迁入定居的个人提供以生活支出为基础的课税，取代对全球收入和财富的课税，联邦层面的最低税基为40万瑞士法郎，州一级的最低税基更高。个人每年缴纳固定金额，财富可随意存放，没有部署要求，也没有支出下限；如果选择修正定额课税，大多数情况下还可享受协定待遇。新加坡则向每一位居民提供无财富税、无资本利得税的属地税制，无须任何特别协议，并在此之上叠加一项以规模、人员、支出和本地投资为条件的基金豁免。[1]

比较要点	**新加坡家族办公室（第13O条／第13U条）**	**楚格州定额课税**
适用对象	具备最低资产和人员的任何家族	在瑞士没有工作的外国公民，首次迁入或离开10年后返回
年度税负	豁免的基金收入为零；管理公司利润17%；薪金个人所得税最高24%	按名义税基缴纳固定金额，在楚格州通常为每年25万至100万瑞士法郎
财富税	无	已包含在定额税基中

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比较要点	新加坡家族办公室（第13O条／第13U条）	楚格州定额课税
资本利得	如属资本性质则无	私人财富的资本利得在任何情况下均免税
质押及代币收益	作为收入征税，除非在豁免基金中且来自指定投资	由定额覆盖，但须进行控制计算
本地投资要求	管理资产的10%或1000万新元	无
人员要求	2–3名投资专业人员	无
居留许可	受雇家族成员申请就业准证；通过GIP取得永久居民身份	B类许可，5年或10年后取得C类许可
传承	无遗产税	无联邦继承税；楚格州对直系后代不征收
协定待遇	新加坡居民可享有	部分协定须采用修正定额课税

对于拥有1亿新元、其中一半为代币的家族来说，如果希望通过某种结构继续积极交易或质押，算账的结果对新加坡有利。新加坡的豁免吸收指定投资部分的收入，而个人持有部分则完全免税。如果家族希望只缴纳一笔可预期的款项、不配备员工、没有部署要求，或者家族财富主要是永远不可能成为指定投资的代币，算账的结果则对楚格州有利。瑞士的财富税本会是决定性的反对理由，但它已被吸收进定额之中。实践中，决定取决于家族希望在哪里生活。第P部分第I章将此作为首要问题，税务算账则居其次。

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楚格视角

选择楚格州的家族，将代币自行托管或存放于瑞士银行，缴纳协商确定的定额税款。除了确认定额高于瑞士来源收入和享受协定减免收入应纳税额的控制计算之外，没有其他年度合规义务。选择新加坡的家族则要建立一个组织。两者都行得通。新加坡路线适合下一代将从亚洲经营投资业务的家族。楚格路线适合财富已经积累完成、希望以最少的结构保全财富的家族。

注释

1. Direct Federal Tax Act (DFTA; DBG)，SR 642.11，第14条（按支出课税；经指数调整的联邦最低税基40万瑞士法郎）；Tax Harmonisation Act (THA; StHG)，SR 642.14，第6条。楚格州的实务做法见第G部分第VI章。 ↩

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