为何一部瑞士—新加坡专著要论及香港

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在讨论新加坡时，客户最常提及的司法管辖区是香港；在讨论亚洲时，瑞士私人银行最常提及的也是香港。半个世纪以来，这两座城市一直在争夺同样的委托业务。在数字资产领域，这种竞争于2022年10月公开化：就在新加坡转向限制性政策数周之内，香港特区政府发表了有关虚拟资产的政策宣言。此后，竞争一直延续：香港推出了交易平台发牌制度、亚洲首批现货比特币和以太币交易所买卖基金、一部稳定币条例，并于2025年发表了第二份政策宣言。选择亚洲基地的创始人、选择托管人的家族办公室，或选择在何处为亚洲加密客户入账的瑞士银行，都会对这两地进行比较。[1]

作者本人的经历为本章提供了一个独特的视角。他具有香港律师（solicitor）执业资格，在亚洲的十五年中有一段时间在香港执业。他曾见过同一位客户带着同一个问题，刚走出香港的会议室，又走进新加坡的会议室。这使他认识到，正确的答案几乎从来不是“二选一”。本章阐述截至2026年6月30日的香港制度，将其与新加坡和瑞士进行比较，并说明香港如何融入以楚格和新加坡为基础的战略。

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注释

1. Financial Services and the Treasury Bureau (FSTB)， Policy Statement on Development of Virtual Assets in Hong Kong， 2022年10月31日。FSTB, Policy Statement 2.0 on the Development of Digital Assets in Hong Kong, 2025年6月26日。 ↩

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