家族办公室：第13O条、第13U条与单一家族办公室

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

截至2020年底，新加坡约有400家单一家族办公室获得新加坡金融管理局授予的税务优惠。四年后，这一数字已超过2,000家，并一直保持在这一水平。[1]在那些年里，金融中心很少有哪个领域像它一样引人瞩目。家族办公室成为新加坡作为亚洲私人财富归宿这一新角色的象征。2023年之后，它也成为此类财富所带来风险的象征。

本章探讨使这一增长成为可能的法律框架，以及国家为此附加的条件。税务优惠根据《1947年所得税法》第13O条、第13OA条和第13U条，授予持有家族资产的投资基金。管理该基金的家族办公室无需持牌，但自2026年6月起须向监管机构作出通知并提交年度申报。本章介绍单一家族办公室的兴起、税务计划及其条件、牌照豁免和监管期望、实质、本地支出和本地投资的要求，以及2023年洗钱案后随之而来的审查。最后，本章阐述对家族及其顾问的实务影响，并与日内瓦和香港进行比较。

© 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.

日内瓦卷将家族办公室描述为该城市私人银行传统的产物：早在法律关注之前，当地的家族及其顾问就已建立了此类架构。新加坡则提供了相反的例子。在这里，是国家设计了家族办公室落户的条件，为其规模、人员和支出设定了数量门槛，并在政策权衡发生变化时随时调整这些门槛。因此，家族办公室制度集中体现了新加坡作为金融中心的方法：附带条件的激励措施，由拥有广泛裁量权的监管机构负责管理，并以较短周期进行修订。

要点

单一家族办公室管理一个家族的财富，不为第三方客户提供服务，因此新加坡不对其发放牌照。税务豁免授予基金载体，依据为第13O条或第13OA条（家族办公室基金的指定投资为2,000万新元）或第13U条（5,000万新元），并须满足有关投资专业人员、本地支出、本地资本配置以及私人银行账户的条件。享有此类优惠的家族办公室数量，从2020年底的约400家增至2024年底和2025年底的逾2,000家。自2026年6月15日起，每一家单一家族办公室都必须满足类别豁免的条件，在开业后14天内通知MAS，并提交年度申报，现有家族办公室的期限为2027年6月15日。2023年洗钱案中，有六只享有优惠的家族办公室基金与被定罪人士有关，此案导致筛查更加严格，并更加依赖银行发挥把关作用。

注释

1. Monetary Authority of Singapore，副总理兼贸工部长、MAS主席颜金勇（Gan Kim Yong）就林志蔚副教授（Assoc Prof Jamus Jerome Lim）国会提问所作的书面答复，2025年2月5日（mas.gov.sg, “Written reply to Parliamentary Question on licensing of SFOs under the SFA”）：获得税务优惠的单一家族办公室数量从2020年底的约400家增至2024年底的逾2,000家。 ↩

© 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