实际影响：在金融中心之间作出选择

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真正重要的标准

在新加坡、香港、迪拜、伦敦和瑞士各金融中心之间作出选择的家族、企业或资产管理人，所权衡的标准只有一部分能为排名所反映。对大多数客户而言，法律确定性居于首位：法院的质量和独立性、判决和仲裁裁决的可执行性以及法律的稳定性。其次是政治风险，包括制裁、资本管制和冲突的风险。税务待遇固然重要，但自全球最低税和自动信息交换推出以来，其分量已经下降。当地市场的深度、合格人才的供应、生活成本和时区，构成了完整的图景。

税收的分量

企业税率之间的差异比公众讨论所显示的要小。新加坡对公司应税所得按17%的统一税率征税，并通过部分免税和激励措施予以减少。[1]香港按地域来源原则征收16.5%的利得税，不征收资本利得税。[2]英国对超过25万英镑的利

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润适用25%的主要税率。[3]日内瓦州的实际税率约为14%。[4]对大型集团而言，15%的全球最低税进一步缩小了这些差异。[5]如今，决定性的税收差异在于对个人、投资基金和家族办公室的课税。

核对清单

- 在比较各中心之前，先确定需要落地的职能（资产入账、管理、交易、区域总部或家族居所），因为各中心擅长的职能各不相同。
- 评估法律环境：具有管辖权的法院、主要合同的准据法，以及判决和仲裁裁决在资产所在国的可执行性。
- 结合家族或企业的来源国，梳理各中心的政治风险和制裁风险，包括该中心所在地区发生冲突的风险。
- 比较全部税负，包括个人所得税、投资收益税和遗产税，并对超过门槛的集团核查全球最低税的影响。
- 核实新加坡、香港和海湾自由区激励制度的实质性要求，例如最低资产、本地员工和本地开支。
- 向关键的交易对手核实该中心的监管声誉：银行、审计师、本国税务机关以及金融行动特别工作组。
- 考虑组合使用多个中心，例如在瑞士或新加坡设立入账中心，在另一地设立家族办公室或运营公司，以分散法律和政治风险。
- 定期复核决策，因为排名、税收制度和政治条件的变化，比在其基础上建立的架构更快。

注释

1. 新加坡国内税务局，“Corporate Income Tax Rate, Rebates and Tax Exemption Schemes”（iras.gov.sg，2026年11月访问）：“Your company is taxed at a flat rate of 17% of its chargeable income.”↩

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2. Wikipedia，“Taxation in Hong Kong”（2026年11月访问）：公司利得税税率为16.5%；“Hong Kong uses only the territorial source jurisdiction”；资本利得不属于利得税的征税范围。↩
3. 英国税务海关总署，“Rates and allowances: Corporation Tax”（gov.uk，2026年11月访问）：2023至2026财政年度，超过25万英镑的利润适用25%的主要税率。↩
4. 自2020年企业税改革以来，日内瓦的综合实际税率为13.99%（ge.ch，“Mise en œuvre à Genève de la réforme de la fiscalité des entreprises (RFFA)”），据日内瓦卷第K部分第III章引述。↩
5. 经合组织/二十国集团支柱二规定，对年收入至少7.5亿欧元的集团征收15%的全球最低税；新加坡通过Multinational Enterprise (Minimum Tax) Act 2024实施，适用于2025年1月1日或之后开始的财政年度；瑞士自2024年1月1日起征收补足税（联邦财政部，据日内瓦卷第G部分第VI章引述）；参见第E部分第I章。↩

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