Choisir entre un fonds singapourien et un fonds suisse

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

La décision dépend des investisseurs, de la stratégie et du problème des jetons décrit plus haut. Le tableau suivant résume les points qui tranchent la plupart des mandats. La partie P, chapitre VI développe cette comparaison en un guide de structuration.

Critère	**VCC singapourienne, section 13O / 13U**	**L-QIF suisse**
Autorisation réglementaire du fonds	Décision fiscale de la MAS ; pas d'autorisation du produit	Aucune ; le gestionnaire doit être autorisé par la FINMA
Délai de lancement	3 à 6 mois	2 à 4 mois
Jetons de paiement détenus directement	Admis ; revenu non exonéré	Admis dans le cadre des règles de placement du L-QIF
Impôt au niveau du fonds	Exonération sur les placements désignés ; 17 % sur le reste	Transparent (FCP, SICAV) ou imposé (SICAF)
Taille minimale pour le statut fiscal	5 millions de S$ (13O) / 50 millions de S$ (13U) en placements désignés	Aucune

© 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.

Critère	VCC singapourienne, section 13O / 13U	L-QIF suisse
Substance locale	Administrateur, professionnels de l'investissement, dépenses	Direction de fonds ou gestionnaire suisse
Base d'investisseurs	Mondiale ; investisseurs singapouriens sans difficulté sous la 13U	Investisseurs qualifiés uniquement
Parts tokenisées	Admises ; pilotes du Project Guardian	Admises comme droits-valeurs inscrits
Accès aux conventions fiscales	Oui pour une VCC résidente de Singapour	Limité ; dépend de la forme du fonds

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 Law and regulation change frequently, so the content may be incomplete or outdated.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

© 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.