The agreement and its history

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

The Agreement between the Republic of Singapore and the Swiss Confederation for the Avoidance of Double Taxation with respect to Taxes on Income was signed in Singapore on 24 February 2011. It entered into force on 1 August 2012 and took effect for Singapore from 1 January 2013. It replaced a 1975 agreement that predated both countries' modern financial centres and had no effective exchange of information clause.[1] A protocol signed on 27 July 2017 brought the agreement into line with the BEPS minimum standards on treaty abuse and dispute resolution, because Switzerland chose to implement those standards bilaterally with most partners instead of through the Multilateral Instrument. The agreement is therefore not modified by the MLI and must be read with its 2017 protocol.[2]

The agreement covers income taxes only. Switzerland's wealth tax and the cantonal inheritance and gift taxes are outside it, as is Singapore's GST and stamp duty. That scope is the first thing a client with assets in both places must grasp. The Swiss wealth tax on tokens held by a Swiss resident is unaffected by anything in the treaty. A Singapore resident with Swiss tokens pays no Swiss wealth tax because he is not Swiss-resident, treaty or no treaty. The treaty allocates taxing rights over income

© 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.

between the two states according to the OECD model of its time and sets out in Article 4 the rules that decide, when both states claim a person as resident, which of them wins.

Notes

1. Agreement between the Republic of Singapore and the Swiss Confederation for the Avoidance of Double Taxation with respect to Taxes on Income, signed 24 February 2011, in force 1 August 2012; SR 0.672.968.91; IRAS, list of DTAs, Switzerland. ↩
2. Protocol amending the Agreement of 24 February 2011, signed 27 July 2017. ↩

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.