Stablecoins: the Swiss comparison

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

Switzerland has no stablecoin statute. FINMA classifies stablecoins under existing law in its 2019 supplement to the ICO Guidelines and in Guidance 06/2024. A token redeemable at par against the issuer is a deposit under the Banking Act. A token backed by a managed pool is a collective investment. A token that is a payment instrument accepted by third parties is a means of payment under the AMLA (see Part E, Chapter VII). The Federal Council has considered a dedicated regime and had not legislated by 30 June 2026. The Swiss approach therefore produces bank-issued or bank-guaranteed stablecoins, such as those issued by Sygnum and AMINA, with the issuer either holding a licence or relying on a bank's default guarantee.

The Singapore approach produces non-bank issuers with a payment licence and a prescribed reserve. The two models reflect the two hubs' views of risk. Switzerland trusts the banking system and brings stablecoins into it. Singapore trusts a narrow, auditable reserve and keeps the issuer away from the banking system's balance sheet risk. For an issuer the Singapore model is cheaper to enter if the framework is enacted, because an MPI licence with S$ 1 million of capital is less demanding than a Swiss banking licence. The Swiss model gives the holder a deposit-insured or bank-guaranteed claim, which the Singapore model does not.

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Feature	Switzerland (FINMA practice)	Singapore (MAS framework)
Legal basis	Banking Act, CISA, AMLA as applied by FINMA guidance	PSA stablecoin issuance service (framework announced 2023; legislation pending at cutoff)
Eligible issuers	Banks, fintech licensees, issuers with bank default guarantee	MPIs; banks exempt from licence but subject to standards for the label
Reserve	Deposit treatment; bank balance sheet	≥ 100 % in cash, cash equivalents and ≤ 3-month government paper of the pegged currency
Capital	Banking or fintech capital rules	Higher of S$ 1m or 50 % of annual opex; plus liquid assets
Redemption	Contractual; FINMA expects redemption at par	Within five business days at par, direct with issuer
Label	None	"MAS-regulated stablecoin"
Retail treatment	Depends on classification	Not a DPT; no consumer access restrictions; full value for accredited investor test
Multi-jurisdiction issuance	Not addressed	Not permitted at outset

Practice note

If you intend to issue a stablecoin that Singapore residents will use, decide early whether you want the MAS-regulated label. The label requires issuance from Singapore, a reserve of the highest quality in the pegged currency, S$ 1 million or more of capital and a five-day redemption promise. It confines the issuer to issuance, redemption and custody. In exchange it takes the coin out of the DPT regime and lets retail customers hold it without restriction. If you do not want the label, the

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coin is a DPT in Singapore. Every licensee that lists it must apply the consumer measures, so the coin will compete at a disadvantage with labelled coins in Singapore distribution. The decision determines the group structure, the custodian relationships and the jurisdiction of issuance, so it should be made before the token contract is deployed.

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Author contact: Dr Alexander Ressos, TEP · contact@ressos.com