Comparison with the Swiss regime for portfolio managers

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Two routes to the licensing of independent managers

Switzerland brought its independent asset managers under prudential supervision only with the Financial Institutions Act of 15 June 2018, which entered into force on 1 January 2020 together with the Financial Services Act. Article 17 defines the portfolio manager as anyone who, on the basis of a mandate, can dispose of the assets of clients on a professional basis in their name and for their account. Before 2020, Swiss independent managers were subject only to the anti-money laundering law through membership of a self-regulatory organisation. Existing firms had until the end of 2022 to apply for a licence.[1]

Singapore took a different route. It placed independent managers in the general fund management regime from the start and tightened that regime in two stages, in 2012 and 2024. The result is a single licence for all managers, whatever their business model, supervised directly by MAS. Switzerland created a specific category of portfolio manager, separate from managers of collective assets. It also entrusted ongoing supervision to private supervisory organisations, which are themselves authorised and supervised by FINMA.[2]

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Capital, governance and client classification

The quantitative requirements are of similar order. A Swiss portfolio manager needs minimum capital of CHF 100,000, paid in cash, and equity of at least a quarter of its fixed costs. Its management must consist of at least two qualified persons, unless continuity can be ensured with one.[3] A Singapore A/I manager needs base capital of S$250,000, a resident chief executive, two directors, two relevant professionals and two representatives, with risk-based capital on top. The Singapore requirements are somewhat heavier on capital and staffing. The Swiss regime adds the costs of the supervisory organisation and its audits.

Both systems classify clients and relax the rules for the wealthy. Under the Swiss Financial Services Act, clients are private, professional or institutional. A wealthy private client may declare that he wishes to be treated as a professional client, either with assets of at least CHF 500,000 and the necessary knowledge or with assets of at least CHF 2 million.[4] Singapore also admits income as a criterion, which Swiss law does not. The mechanism is similar, because in both centres the client must make an express choice. The Swiss opting-out moves a private client into the professional category, whereas the Singapore opt-in confirms a status for which the client is already eligible.

The single family office

The treatment of single family offices is also similar. Swiss law exempts from the licence those who manage only the assets of persons with whom they have economic or family ties.[5] Singapore achieves the same result through the exemption in the Second Schedule to the Licensing and Conduct of Business Regulations. In Switzerland the exemption covers the licence only and leaves anti-money laundering and transparency obligations intact where they apply. Singapore links the family office more closely to tax incentives, a point developed in Chapter E.III.

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Consolidation

The Swiss reform has driven a marked consolidation. According to an analysis cited in the Geneva volume, FINMA had approved 1,532 of 1,864 applications by February 2025, while about 650 managers did not apply, a fall of 26 per cent in the number of firms. The median manager administered CHF 61 million.[6] Another study counted 1,309 portfolio managers authorised by FINMA at 31 May 2025, of which 26 per cent were in Geneva, with about CHF 850 billion under management. It found that 83 per cent of them employed ten full-time staff or fewer.[7] The two sources use different dates and methods, so their counts of authorised firms do not match.

Singapore went through a comparable selection in 2012 and again in 2024, when registered managers had to obtain a licence or leave the market. No published figure for the number of external asset managers in Singapore is comparable to the Swiss data. The pressures are nonetheless the same. Because fixed costs for compliance, audit, technology and custody relationships require a minimum size, smaller firms respond by merging, joining platforms or closing.

What the comparison shows

The two centres have converged on similar substantive standards: a licence, minimum capital, qualified management, independent custody, compliance and anti-money laundering controls for anyone who manages other people's money. They differ in the architecture of supervision. Singapore relies on a single, powerful regulator with broad discretion in licensing, which uses guidelines, frequently asked questions and licence conditions to adjust the regime. Switzerland relies on detailed federal statutes and ordinances, applied through supervisory organisations close to the industry.

For a manager active in both centres, the practical consequence is that the Singapore entity must satisfy MAS directly, with fewer intermediaries and more discretion on the regulator's side. The Swiss entity deals with its supervisory organisation in the first instance. For the client, the protection is comparable in substance. The

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Singapore regime perhaps offers greater certainty at the point of entry, since every manager passes through MAS's own licensing review. The Swiss regime provides more specific rules on conduct towards clients through the Financial Services Act.

In figures

Assets under management in Singapore: S$1.63 trillion at end-2012, S$6.7 trillion at end-2025. Asset managers with investment teams in Singapore: 1,320 at end-2025. Share of assets sourced from outside Singapore: about 80 % in 2012, 76 % in 2025. Guidelines SFA 04-G05: issued 7 August 2012, last revised 3 September 2025. Former registered regime: up to 30 qualified investors and S$250 million, repealed 1 August 2024. Base capital: S$250,000 (A/I), S$500,000 or S$1 million (retail). Risk-based capital: at least 120 % of total risk requirement. Minimum experience of the chief executive: 5 years (A/I) and 10 years (retail). Licensing review: up to 6 months, followed by up to 6 months to meet the conditions of the in-principle approval. Accredited investor: net personal assets above S$2 million, net financial assets above S$1 million or income of at least S$300,000. Professional indemnity cover for retail managers: S$2 million to S$25 million. Swiss comparison: CHF 100,000 minimum capital, 1,309 authorised portfolio managers at 31 May 2025.

Notes

1. *Genève, place financière internationale*, chapter E.IV, section "La loi sur les établissements financiers", citing FINMA, press release of 7 July 2020, and PwC Switzerland on the deadline of 31 December 2022; with reference to the Federal Act of 15 June 2018 on Financial Institutions (FinIA; SR 954.1), in force since 1 January 2020, art. 17. ↩
2. *Genève, place financière internationale*, chapter E.VII, section "Les organismes de surveillance : un maillon nouveau", citing FINMA, press release of 7 July 2020: supervisory organisations, authorised and supervised by FINMA, monitor portfolio managers and trustees, while FINMA remains responsible for enforcement. ↩

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3. *Genève, place financière internationale*, chapter E.IV, section “La loi sur les établissements financiers”, and chapter E.VII, section “La succession du gestionnaire indépendant”, with references to FinIA art. 20 (management of at least two qualified persons, one sufficing where continuity is ensured), art. 22 para. 1 (minimum capital of CHF 100,000 paid in cash) and art. 23 (equity of at least one quarter of fixed costs). ↩
4. *Genève, place financière internationale*, chapter E.IV, section “La loi sur les services financiers”, with reference to the Federal Act on Financial Services (FinSA; SR 950.1), art. 4 para. 1 and art. 5 paras 1–2. ↩
5. *Genève, place financière internationale*, chapter E.VII, section on family offices, with reference to FinIA art. 2 para. 2 let. a. ↩
6. *Genève, place financière internationale*, chapter E.VII, section “La transformation réglementaire des gestionnaires indépendants”, citing Val Index, “Gestionnaires de fortune indépendants Suisse”, valindex.ch, 31 January 2026. ↩
7. *Genève, place financière internationale*, chapter E.VII, section “Genève, Zurich et Lugano : la géographie des gestionnaires indépendants”, citing the WealthSummit study (Künzle, Baumann, Feldmann; *Allnews*, 19 March 2026). ↩

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