Singapore and Geneva: competition and complementarity

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

Two models of secrecy

The comparison between Singapore and Geneva begins with secrecy. In Switzerland, Article 47 of the Federal Banking Act of 8 November 1934 placed an existing professional secret under the protection of criminal law. The provision was adopted without particular debate in Parliament and protected a duty whose content derived from contract and from the protection of personality.[1] Singapore's section 47, in its 2001 form, is a statutory code. It defines the prohibited disclosure, lists the permitted exceptions and leaves, after *Susilawati*, no room for judge-made exceptions.

The two regimes also differ in their political meaning. Swiss secrecy became part of national identity and was defended for decades as an expression of sovereignty and privacy. Singapore's secrecy was an instrument of economic policy, rewritten in 2001 when the government judged that the old provision needed modernising, and qualified in 2009 when international pressure made that necessary. The difference

© 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.

explains why Singapore adjusted faster. The government that had built the regime could change it without the referendum campaigns and federal negotiations that accompanied every Swiss concession.

Competition for Asian wealth

In the 2000s Singapore and Geneva competed directly for the wealth of Asian families. Geneva offered centuries of experience, the reputation of its private banks and, until 2009, the strongest secrecy in Europe. Singapore offered proximity, a common law trust regime, low taxes and a government that wanted the business. As Asian wealth grew, the balance shifted. Clients who had once booked assets in Geneva increasingly booked them in Singapore. Swiss banks followed by building up their Singapore operations.

The long-term result appears in the figures for cross-border wealth. According to the Boston Consulting Group, Hong Kong caught up with Switzerland in 2025, both holding about US$2.9 trillion of cross-border wealth, while Singapore reached US$2.1 trillion.[2] The foundations of this position were laid in the decade examined here. The Geneva volume describes the same development from the Swiss side, as one of the challenges facing the Geneva centre.

Complementarity

Competition is only part of the story. The leading Swiss banks are among the largest private banks in Singapore, with many Singapore employees trained in Swiss methods. For these banks Singapore and Geneva are two booking centres of a single group, serving different client bases and offering clients a choice of jurisdiction. Diversification across centres is itself a service that private banks sell to their clients. A family from Southeast Asia may hold part of its assets in Singapore for proximity and part in Switzerland for diversification, under the supervision of the same relationship manager.

© 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.

The relationship also runs through ownership. GIC's investment in UBS in 2007 made the Singapore state a significant shareholder of the largest Swiss bank, which still counted GIC as its largest single shareholder in 2014.[3] In 2024 the chief executive of a Swiss private bank with operations in both cities predicted that Singapore and Hong Kong would become "more and more important competitors to Switzerland as global hubs", while the Financial Times described Singapore as a gateway for global investors into Asia.[4] Both statements are true at once. The two centres compete for clients and cooperate within the same banking groups.

Different roles of the state

The comparison also reveals a different relationship between the state and the private banks. In Geneva the private banks are older than the federal state that regulates them. Several of them were founded in the eighteenth and nineteenth centuries, with partners who carried unlimited personal liability for the debts of their firms. Regulation came late and was shaped by the banks themselves, which obtained criminal protection for secrecy when they accepted federal supervision in 1934.[5] The Geneva centre therefore grew from below, through private initiative and family continuity.

Singapore's wealth management centre grew from above. The government chose the sector, designed its legal framework and invited the banks to come. The private banks that arrived were mostly branches or subsidiaries of foreign groups, whose loyalty to the centre depended on its profitability. This difference has consequences for resilience. A Geneva private bank cannot easily leave Geneva, because its history, its partners and its clients are tied to the city. A foreign private bank in Singapore can reduce its operations whenever the economics change, as several European banks did after 2008. Singapore's answer has been to foster local champions such as Bank of Singapore and the private banking arms of its local banking groups, so that the centre does not depend entirely on decisions taken in Zurich, London or New York.

© 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.

Lessons for both centres

The decade offers lessons for both cities. Geneva learned that a model founded on secrecy could not survive the hostility of the largest economies. Singapore learned the same lesson more quickly, because it entered the market late and adjusted before its model became a source of national conflict. Both centres now compete on the quality of advice, the reliability of their legal systems and the credibility of their compliance. The Geneva volume reaches the same conclusion from the Swiss side. A competitive centre in 2035 will be one where compliance is credible, regulation predictable and competence demonstrated.[6]

In figures

Placement of public funds with private managers announced on 13 November 1998: S$10 billion over three years. Funds managed in Singapore: S$150.6 billion at end-1998, S$465 billion at end-2003 and S$1.173 trillion (about US$814 billion) at end-2007, 86 % of it sourced abroad. Fund management professionals: 822 in 1998. Investment professionals: 2,185 in 2007. Wealth Management Institute: launched on 26 September 2003. Banking Act: in force on 1 January 1971. Section 47 re-enacted by Act 23 of 2001, with penalties of up to S$125,000 or three years' imprisonment for individuals and S$250,000 for others. Trustees (Amendment) Act 2004: in force on 15 December 2004, perpetuity period fixed at 100 years. Trust Companies Act 2005: second reading on 18 February 2005, licensing by MAS from 1 February 2006. Trust industry in 2005: at least 16 trustee businesses, more than 250 employees, about S$80 billion of assets. Estate duty abolished for deaths from 15 February 2008. Bank of Singapore: acquired for about US$1,446 million on 29 January 2010, with about US$23 billion of client assets.

Notes

1. Ressos, *Genève, place financière internationale*, partie D, chapitre IV, citing *Le Temps*, 4 April 2009, and swissinfo.ch: the Banking Act was adopted on 8 November 1934; Article 47 added criminal protection to a duty of

© 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.

confidentiality that already existed under private law; neither chamber debated the provision. ↩

2. Ressos, *Genève, place financière internationale*, partie K, chapitre III, citing Boston Consulting Group, press release of 27 May 2026, "Hong Kong Surpasses Switzerland as the World's Largest Cross-Border Wealth Hub": Hong Kong and Switzerland US$2.9 trillion each in 2025, Singapore US$2.1 trillion, world total US$15.7 trillion. Ressos, *Genève, place financière internationale*, partie E, chapitre II: international competition from Singapore, Hong Kong, Dubai and other centres attracting a growing share of wealthy clients, in particular in Asia and the Middle East. ↩

3. Baumann, *finews.ch*, 23 September 2014, cited above: GIC the largest single shareholder of UBS with 6.4 % since the financial crisis; *Business Times*, 24 September 2010, cited above: the Singapore government bought about 9 % of UBS in late 2007. ↩

4. Walker and Chan, *Financial Times*, republished by swissinfo.ch, 16 October 2024, cited above: Giorgio Pradelli, CEO of EFG, "Singapore and Hong Kong are going to be more and more important competitors to Switzerland as global hubs"; Singapore as a gateway for global investors into Southeast and North Asia. ↩

5. Ressos, *Genève, place financière internationale*, partie D, chapitre IV (the bankers obtained the provisions on professional secrecy as a counterpart to supervision under the Banking Act of 8 November 1934; the private bankers defended the recognition of the unlimited liability of partners), partie D, chapitre I (Pictet & Cie founded in Geneva in 1805) and partie E, chapitre II (the Geneva houses founded in the eighteenth and nineteenth centuries). ↩

6. Ressos, *Genève, place financière internationale*, partie K, chapitre III, box "Attention": a competitive centre in 2035 will be one where compliance is credible, regulation predictable and proportionate and competence demonstrated; Dubai and Singapore learned this when money laundering cases damaged their reputation. ↩

© 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.

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