Trusts, Holding Structures and the Variable Capital Company: summary

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

Singapore offers wealthy families and investors a complete set of structuring vehicles under its own law: the trust, the licensed and the private trust company, the Variable Capital Company and the holding company. Its trust law rests on English equity and the reforms of 2004, which introduced a 100-year perpetuity period, a firewall against foreign forced heirship rules and a limited power to reserve investment functions to the settlor. The Trust Companies Act 2005 places professional trustees under licensing and supervision by MAS, while private trust companies are exempt on condition that a licensed trust company carries out their anti-money laundering compliance. The Variable Capital Company, launched in 2020, has become the main domestic fund vehicle, with 1,406 companies and 3,443 sub-funds by the end of 2025. Holding companies still benefit from tax-free dividends, the absence of a capital gains tax and a broad treaty network, although section 10L, the global minimum tax and the new rules on corporate service providers now require real substance in Singapore.

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 Law and regulation change frequently, so the content may be incomplete or outdated.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