基本資本及財務要求

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標準支付機構的基本資本為10萬新加坡元，主要支付機構則為25萬新加坡元。[1]根據《2019年支付服務規例》（Payment Services Regulations 2019）第2(2)條，基本資本的定義為已繳足普通股本、已繳足不可贖回及非累積優先股本與若干儲備的總和，減去累計虧損及若干扣減項目。[2]以證券公司或銀行的標準而言，這些數字偏低，因為其目的並非吸收營運虧損。MAS轉而依賴主要支付機構的保證金、客戶資產的保障及分隔，以及要求公司維持正資產淨值、並在出現任何違反情況時通知MAS的牌照條件。

法定數字偏低，不應令創辦人誤判實際所需的資本。MAS要求公司證明其至少在第一年能夠在不依賴客戶資產的情況下為營運提供資金。實務上，MAS期望從事DPT業務的主要支付機構申請人能證明已落實數百萬新加坡元的資金。牌照亦會附帶一項條件，要求公司持有高於法定基本水平的最低資本額；MAS曾利用這類條件，要求DPT持牌人持有與其營運風險相稱的資本。

主要支付機構的保證金由《支付服務法》第22條規定，以現金或銀行擔保形式存放於MAS。保證金金額取決於持牌人的每月交易量及服務數目，作為客戶申索的最後保障基金。保證金有別於第23條下對客戶款項的保障。就主要支付機構而言，該等款項必須存放於新加坡一家銀行的信託帳戶、由銀行擔

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保覆蓋，或由銀行承諾承擔全部責任。[3]第23條下的保障適用於「相關款項」，即就支付服務收取的法定貨幣，並不適用於代幣。客戶代幣的保護由2024年引入的另一套分隔制度規管。

註釋

1. MAS網站mas.gov.sg上的「Standard Payment Institution Licence」頁面（基本資本10萬新加坡元）；主要支付機構25萬新加坡元的數字載於Payment Services Regulations 2019及相應的MAS頁面。 ↩
2. Payment Services Regulations 2019 (S 810/2019)，第2(2)及2(3)條，"base capital" 及 "irredeemable and non-cumulative preference share capital" 的定義，參見Singapore Statutes Online。 ↩
3. PSA，第22條（保證金）及第23條（相關款項的保障）；Payment Services Regulations 2019有關信託帳戶及銀行承諾的條文。 ↩

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