不完整及不合規的轉帳

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新加坡持牌人收到欠缺所需資訊的數碼支付代幣（DPT）轉帳時，有三種合法的處理方式：先執行再跟進、暫停處理以待補充資訊，或拒絕並退回。通告要求持牌人制定以風險為本的政策，列明在何種情況下採用何種處理方式。新加坡金融管理局（MAS）亦期望，對於較高價值的轉帳及身份不明的交易對手，政策應更為嚴格。[1] 區塊鏈帶來一個法定貨幣所沒有的難題：款項已經到帳。拒絕即意味着要把款項退回，而退回本身亦是一宗受該規則規管的轉帳；如果匯出地址已被盜用，退回本身更可能成為洗錢的一個環節。對於超過適度價值的轉帳，較穩妥的做法是暫停處理，不把任何款項記入客戶帳戶，並向交易對手索取資訊。若資訊未能在指定期限內送達，公司應先考慮提交可疑交易報告（第IV章），然後才決定是否退回款項。

反覆從同一交易對手收到不合規轉帳，本身已是一項值得記錄的發現。通告期望持牌人在決定是否繼續與該交易對手往來及是否舉報時，將此納入考慮。記錄每個虛擬資產服務提供者合規往績的交易對手名單，正是處理這問題的工具，MAS的檢查人員亦會要求查閱。

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實務提示

只要採用以下四項設定，你實施新加坡旅遊規則的方式亦可同時令瑞士檢查人員滿意。 - 不論金額大小，每宗轉帳均收集PSN02所列的完整資訊，從而在系統中取消1,500新加坡元的區分。 - 任何提款至非託管錢包之前，均須以簽署訊息證明控制權，這符合FINMA第02/2019號指引，亦高於MAS的期望。 - 設立一份兩個實體共用的交易對手虛擬資產服務提供者登記冊，為每個交易對手註明狀態。 - 旅遊規則數據保存十年，即兩地法定期限中較長者。代價是新加坡零售客戶略為不便，好處是一套可同時通過兩個金融中心檢查的單一管控措施。

註釋

1. MAS Notice PSN02，第13段，有關以風險為本的政策及程序，用以決定何時執行、拒絕或暫停欠缺所需匯款人或收款人資訊的價值轉帳。 ↩

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