在新加坡開立銀行戶口

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2025年後的狀況

新加坡三家本地銀行（星展、華僑、大華）及持牌外資銀行對數碼資產業務進行行業風險評估；自2022年多宗倒閉事件以來，這套評估一直屬各金融中心中最保守之列。新加坡金融管理局（MAS）曾公開表示，它並無指示銀行拒絕該行業，並期望銀行按個別客戶的實際情況作出評估。新加坡銀行公會於2023年就應予考慮的因素發出指引。[1]實際上，銀行在2026年的立場是會考慮三類公司：持有MAS牌照或原則上批准的公司、業務在監管範圍以外而資金屬來自已識別來源的法定貨幣的公司，以及受監管集團的附屬公司。銀行會拒絕在無牌情況下買賣代幣的公司、已申請牌照仍在等候結果的公司，以及庫房在鏈上的公司。

數碼代幣服務提供者（DTSP）制度改變了第IV章所述「只服務海外客戶」模式的算式。在2025年6月30日前，只服務外國客戶的新加坡公司可以向銀行表示自己不受監管而且合法。在該日之後，這類公司要麼已取得DTSP牌照（MAS只會在極為有限的情況下批出），要麼屬非法經營。沒有新加坡銀

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行會為後者開立或保留戶口。[2]過往採用該模式的集團已把有關業務遷往瑞士、香港或杜拜，只在新加坡保留一家為集團提供服務的公司，並以此為基礎往來銀行。

新加坡銀行要求甚麼

新加坡的開戶文件與瑞士相似，但多了三項。銀行會要求提供MAS牌照，或一份確認無須領牌的法律意見書，而且銀行會細閱該意見書。銀行會要求提供公司本身的打擊洗錢政策，以及其合規主任的姓名及資歷，即使公司在監管範圍以外亦然，因為新加坡銀行公會的指引把公司的合規文化視為風險因素。銀行亦會要求提供交易監察計劃，顯示公司將如何偵測可疑活動並向銀行報告；實際上，這即是承諾採用區塊鏈分析服務供應商。能令銀行滿意的公司需時兩至四個月，未能令銀行滿意的則遙遙無期。

新加坡視角

瑞士集團為其新加坡附屬公司開立戶口時，應如實介紹該附屬公司：一家由受監管或屬SRO成員的瑞士母公司擁有的服務公司，有明確界定的交易對手及一份僱員薪酬名單。母公司的FINMA或SRO身份是整份文件中最有用的一份文件。附屬公司在首年不應計劃透過其新加坡戶口收取代幣兌換所得款項，這些款項應經由瑞士母公司處理。附屬公司一旦取得牌照或累積一年清白的法定貨幣往來紀錄，便可開始商討鏈上資金流入的問題。

註釋

1. MAS，就銀行對數碼資產業務去風險問題回覆國會質詢（2022年及2023年）；Association of Banks in Singapore, "Industry Guidance on Managing Risks of Digital Payment Token Service Providers"，2023年。第L部分第V章。↩

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2. Financial Services and Markets Act 2022，第9部分，第137條（禁止在無牌情況下於新加坡境外提供數碼代幣服務），於2025年6月30日生效；MAS, "Response to Feedback Received on Proposed Regulatory Approach for Digital Token Service Providers"，2025年5月30日，第2.5段。第K部分第V章。↩

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