整體解讀制度

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

新加坡數碼支付代幣（DPT）公司的合規主任同時處理五個層面。刑事法例訂明罪行及個人責任風險。新加坡金融管理局（MAS）通告訂明責任。指引訂明預期的方法。國家風險評估描繪風險圖像。FATF刊物提供用語及發展方向。這些層面均不能單獨閱讀。以下實例說明它們如何結合。

例子

一家新加坡主要支付機構為一名企業客戶開戶。該客戶在英屬維爾京群島註冊成立，董事居於第三國，申報業務為「數碼資產資金管理」。客戶希望把200萬新加坡元的USDT兌換為新加坡元，再轉至一個新加坡銀行戶口。根據PSN02，公司必須識別及核實客戶及其實益擁有人，了解其擁有權及控制架構，並確定業務關係的目的及資金來源。由於架構涉及董事非居民的離岸公司及高風險產品，須進行加強盡職審查。根據國家風險評估，離岸法人、穩定幣及兌換為法定貨幣的組合，符合一項優先類型。根據CDSA，如公司高級人員在未解決危險信號的情況下繼續辦理，而資金其後證實為詐騙得益，他們便須面對是否有合理理由相信該財產屬犯罪行為利益的問題。根據

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TSOFA，以聯合國及新加坡的指定名單篩查董事，是能否繼續辦理的先決條件。只有五個層面全部符合，開戶決定才屬合法，而檔案必須顯示這一點。

本部分其餘內容按客戶關係的生命周期依次講解上述各點，然後探討30億新元案對機構的教訓、制裁、合規部門的組織，最後討論跨境集團。

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Author contact: Dr Alexander Ressos, TEP · contact@ressos.com