依賴第三方

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PSN02容許公司依賴第三方執行客戶盡職審查（CDD）中的識別、核實及目的部分，但須符合三項條件。第三方本身必須受符合FATF標準的AML/CFT要求規管及監管。公司必須即時取得CDD資料，並必須能夠在提出要求時毫不延遲地取得相關文件。公司仍須對結果負責。[1]持續監察不得根據依賴條文外判，但可根據外判指引作為一項服務外判（第VII章）。公司必須記錄對第三方的評估，並定期覆核。

依賴安排在兩種情況下最為相關。第一是集團內部：新加坡主要支付機構（MPI）依賴其楚格聯屬公司就共同客戶進行的CDD。此處的問題是，楚格聯屬公司作為《瑞士打擊洗錢法》（GwG/AMLA）下瑞士自律監管組織的成員，是否符合「受規管及監管」的準則。我認為符合，因為FATF承認自律監管組織的監管屬對瑞士金融中介機構的足夠監管；但新加坡公司必須把這一觀點記錄在案，並仍須自行篩查及監察。第VIII章會進一步闡述這一點。第二種情況是依賴引介經紀或帶來客戶架構的持牌信託公司。新加坡公司不得接受引介人的摘要。它必須自行持有識別資料，並必須能夠在視察時出示文件。

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CDD要素	標準（PSN02第6段）	簡化（第7段）	加強（第8段）
識別及核實客戶	須在建立關係或交易前進行	須進行，深度減低	須進行
實益擁有人	識別，合理核實	識別，就低風險實體可依賴公開登記冊	識別及核實，附架構圖
目的及性質	須進行	可從產品推斷	詳細記錄
資金來源	在風險需要時	通常不需要	須進行
財富來源	通常不需要	不需要	須進行
高級管理層批准	不需要	不需要	開立及延續均須批准
覆核頻率	2至3年，觸發式	周期較長	每年及觸發式
篩查	開戶時及定期	開戶時及定期	開戶時、定期，並加強負面媒體篩查

註釋

1. MAS Notice PSN02，第9段（由第三方執行措施）。 ↩

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