第一階段：準備及申請前接觸

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

準備階段決定結果。新加坡金融管理局（MAS）並不當然安排申請前會議，但會回覆列明擬經營業務並詢問適用牌照類別及服務的書面查詢。如查詢涉及實質問題，MAS會與申請人會面。查詢應簡短、具體，並如實描述業務模式，因為MAS會保存往來函件，並與申請書互相比對。[1]若查詢描述的是保管業務，申請書描述的卻是交易所，便會遭到質詢。

申請人應利用準備階段處理五項事宜。第一是法律實體：一家在新加坡註冊成立的公司，或在新加坡註冊的外國公司，須設有固定營業地點，董事會須符合第II章所述的居住要求，股本亦須符合基本資本要求。[2]第二是管理團隊：行政總裁、合規主任及科技主管須居於新加坡，具備受監管金融服務經驗，並須在申請前獲委任及在申請書中列名。第三是政策文件。這包括按PSN02撰寫的打擊洗錢及恐怖分子資金籌集（AML/CFT）政策、對應TRM Guidelines及PSN05的科技風險框架、符合2024年規例的保管及分隔政策，以及如擬服務零售客戶，PS-G03所要求的消費者保障措施。第四是獨立評估人，應及早委聘，使評估與申請同步進行。第五是業務計劃，連同與牌照類別相符的三年預測。

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

核對清單

提交DPT牌照申請前，請確認： - 新加坡實體已存在，設有註冊辦事處及固定營業地點，已發行股本不低於該牌照類別的基本資本 - 董事會包括一名新加坡公民或永久居民執行董事，或符合替代組成要求，且全體董事已填妥適當人選問卷 - 行政總裁、合規主任及科技主管已獲委任，居於新加坡，並可出席面談 - AML/CFT政策、科技風險框架、保管及分隔政策及消費者保障程序均已定稿、經董事會批准並已實施 - 已委聘獨立評估人，評估預定在提交申請後三個月內完成 - 業務計劃、預測、集團架構圖及資金來源證明彼此一致，並與所申請的牌照類別相符 - 客戶條款、風險披露及風險認知評估已按新加坡法律擬備，並以新加坡為爭議解決地

註釋

1. MAS，"Guidelines on Licensing for Payment Service Providers"（PS-G01），關於申請前接觸及MAS期望在提交申請前取得的資料的章節。 ↩
2. MAS，mas.gov.sg上的"Standard Payment Institution Licence"頁面，資格準則：在新加坡註冊成立或註冊、固定營業地點或註冊辦事處、100,000新加坡元基本資本，以及董事會組成要求。 ↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

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

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.