全機構風險評估

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在為任何客戶開戶之前，PSN02要求公司識別及評估其在客戶、國家、產品、服務、交易及交付渠道各方面所面對的洗錢及恐怖分子資金籌集風險。評估必須記錄在案、保持最新，並經高級管理層批准。[1]新加坡金融管理局（MAS）視察人員最先閱讀的就是這份文件。其質素決定視察的走向，因為其後每一項管控，都會以公司本身識別的風險為準加以測試。把本身風險全面評為低的公司，等於邀請視察人員找出其遺漏的風險。

指引期望評估考慮國家風險評估對數碼支付代幣（DPT）行業的結論、FATF的虛擬資產指引及危險信號指標、公司本身的客戶數據，以及其產品特有的類型。就DPT業務而言，產品層面的分析至少應區分法定貨幣兌DPT、DPT兌DPT、保管，以及往來非託管錢包的轉移。分析亦應分別處理往來其他服務提供者的轉移、穩定幣兌換、場外大宗交易，以及向非零售客戶提供的任何借貸、質押或收益產品。[2]每一項的固有風險各不相同。保管企業資金庫與零售法定貨幣入金的風險狀況不同。記錄完整的評估會說明原因。

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新加坡DPT公司的國家風險

國家風險是新加坡公司最常未能達到MAS期望的環節，因為新加坡DPT交易所的自然客戶群屬區域性，包括打擊洗錢框架薄弱的司法管轄區。MAS要求公司特別留意FATF呼籲採取反制措施或列入加強監察的國家，以及MAS本身以通告指定的任何司法管轄區。[3]在該名單以外，公司必須建立本身的國家風險模型。站得住腳的模型會結合FATF名單、Basel AML Index或同類指數、透明國際的清廉指數、制裁風險及公司本身的經驗，並加權及記錄在案。MAS不規定權重，只會問公司能否解釋其權重。

註釋

1. MAS Notice PSN02，第4段（評估風險及採用風險為本方針）；Guidelines to Notice PSN02，關於全機構風險評估的章節。 ↩
2. Guidelines to Notice PSN02，關於風險評估及風險緩減的章節；FATF，Updated Guidance for a Risk-Based Approach to Virtual Assets and VASPs，2021年10月，第30至90段關於風險因素。 ↩
3. MAS Notice PSN02，第8段（對較高風險國家的加強CDD）；FATF，High-Risk Jurisdictions subject to a Call for Action及Jurisdictions under Increased Monitoring，於每次FATF全體會議後更新。 ↩

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