PSN02的結構

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

新加坡金融管理局（MAS）Notice PSN02的編排次序，與MAS其他所有打擊洗錢及恐怖分子資金籌集（AML/CFT）通告相同，由《銀行法》通告（MAS Notice 626）以至適用於資本市場中介人、信託公司及保險公司的通告皆然。熟悉其中一份的讀者，便掌握所有通告的骨架。通告以定義及適用範圍開篇，述明基本原則，要求進行全機構風險評估及採用風險為本方針，並處理新產品及新科技。其後闡述分為三級（標準、簡化、加強）的客戶盡職審查（CDD），接着是依賴第三方、價值轉移、紀錄保存、個人資料及可疑交易報告。通告最後處理內部政策、合規、審計及培訓。[1]這個結構既有監管作用，亦有教學作用。它告訴合規主任，MAS期望公司按甚麼次序思考。

PSN02有兩項有別於其他同類通告的特點。第一，它適用於每一宗數碼支付代幣（DPT）交易，不論金額。PSN01容許支付服務提供者在20,000新加坡元的臨時交易門檻以下，毋須進行完整CDD便與臨時客戶交易，PSN02卻沒有相應門檻。DPT服務提供者如為未與其建立業務關係的客戶進行任何交易，必須在交易前對該客戶進行CDD。[2]MAS於2019年採取這一立場，超越FATF就臨時虛擬資產交易所定1,000美元／歐元的最低標準，理由是DPT轉

© 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.

移的假名性，令任何門檻都會誘發拆細交易。第二，價值轉移要求（旅遊規則）同樣適用於所有DPT轉移，亦無最低金額，只是1,500新元以下的轉移所需資料較少。第III章會處理該規則。

這對業務模式的影響嚴峻，而且是刻意為之。希望在某一門檻以下匿名服務客戶的DPT自助機、場外交易平台或非託管兌換介面，在新加坡沒有空間。每一名客戶都是已知客戶。來自設有最低金額規則司法管轄區的公司（包括設有1,000瑞士法郎兌換門檻的瑞士），來到新加坡後都須相應重新設計開戶流程（瑞士規則參見第F部分第III章）。

註釋

1. MAS Notice PSN02，Prevention of Money Laundering and Countering the Financing of Terrorism – Digital Payment Token Service，經修訂的第1至17段結構；其次序與適用於銀行的MAS Notice 626及適用於資本市場中介人的MAS Notice SFA04-N02相同。 ↩
2. MAS Notice PSN01，第6段（CDD觸發情況，包括指明支付服務的20,000新元臨時交易門檻）；MAS Notice PSN02，第6段（DPT服務的CDD觸發情況，並無金額門檻）；MAS，Response to Feedback Received on the Proposed AML/CFT Notices under the Payment Services Act，2019年12月5日。 ↩

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 Law and regulation change frequently, so the content may be incomplete or outdated.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

© 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.

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.

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.