報告的時限及質素

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

法規規定須「在合理切實可行的範圍內盡快」作出舉報。新加坡金融管理局（MAS）的指引將此轉化為一項期望：公司對警示的內部調查須在一段短而有記錄的期間內完成，並須在同一期間內作出及執行舉報決定。在監管實務中，MAS曾提及，就大多數個案而言，自警示上報至合規部門起計十五個營業日為最長期限；如資金仍在公司控制之下而可能被轉移，則須更快舉報。[1] 公司的程序應訂明期限，記錄警示日期、上報日期、決定日期及提交日期，並解釋任何延誤。檢查人員會抽查登記冊，計算各段相隔的時間。

質素與時限同樣重要。可疑交易報告辦公室（STRO）一再表示，有用的可疑交易報告（STR）應識別各方，列明交易日期、金額及交易對手，參照客戶資料解釋活動為何可疑，並附上證明文件。[2] 數碼支付代幣公司的報告必須包括鏈上數據：地址、交易雜湊值、分析工具的歸屬判斷及風險評分，以及法定貨幣部分的交易及其銀行資料。報告透過STRO網上通知及舉報平台（SONAR）提交，該平台接受結構化數據及附件。一份寫着「客戶行為異常，見附件結單」的報告屬防衛性提交，只保護有關人員免負第45條的罪責，對其他人毫無幫助。STRO的分析人員每年要分流數以萬計的報告，內容單薄的會被排到最後。

© 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.

防衛性舉報

凡事都舉報的誘惑可以理解。第45條的罪行屬個人責任，標準是客觀的，而不必要的報告看來代價不高。MAS與STRO都不鼓勵這種做法，原因有三。第一，防衛性舉報會淹沒真正的報告，損害情報全貌。第二，這向MAS顯示公司的分析人員無法分辨輕重，此點本身已是對公司管控措施不利的發現。第三，若提交防衛性報告後沒有就客戶關係作出決定，公司便處於最差的境地：它已告訴當局它懷疑該客戶，卻繼續與其交易。正確做法是妥善調查，在不提交報告而結束警示時，像提交報告時一樣仔細記錄理由，並在作出舉報決定的同時，就該客戶作出決定。

註釋

1. Guidelines to Notice PSN02，有關可疑交易舉報的章節，關於提交的及時性；MAS在其針對銀行的AML/CFT指引中表明，期望在轉介合規部門後15個營業日內提交，並已將同一基準應用於各行業。 ↩
2. Suspicious Transaction Reporting Office, STR Quality Guidance及SONAR e-filing user guide，關於STR應有的內容；STRO Annual Report最新版本，關於收到的STR數目。 ↩

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 Law and regulation change frequently, so the content may be incomplete or outdated.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