數碼支付代幣持牌人應從案件汲取的教訓

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委員會的報告及2025年的罰款，界定了新加坡金融管理局（MAS）現時對每家受監管機構（包括數碼支付代幣（DPT）持牌人）所採用的標準。以下六點可直接應用。

財富來源必須以獨立證據佐證，佐證程度須與風險相稱。聲明及公司本身的財務報表並不構成佐證。報稅表、由無關聯核數師審計的帳目、受監管銀行發出的銀行結單、買賣協議及監管申報文件，才構成佐證。

來自較高風險司法管轄區的文件必須經過認證。被告使用偽造的中國稅務文件及銀行推薦信。若銀行曾向發出機構核實文件，本可發現偽造。為來自這類司法管轄區的企業客戶開戶的DPT持牌人，應就檔案中每份具份量的文件設立核實程序。

多重國籍及近期以投資取得的公民身份，均屬須作解釋的風險指標。委員會並沒有說應拒絕這類客戶。委員會指出，新護照、與護照所屬國家聯繫薄弱，以及申報財富來自較高風險行業，這些因素結合起來，須進行深度遠超當時所採用的加強盡職審查。

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警示跡象必須跟進，並須記錄跟進過程。數家銀行曾就被告的帳戶發出警示，但以不充分的理由結案。MAS的罰款將警示處理質素列為違規之一。

資訊必須串連起來。在公司內部，開戶團隊、監察團隊及客戶經理必須分享各自所知。在公司之間，銀行現已有COSMIC平台，MAS亦表示可能擴大其適用範圍。尚未加入的DPT持牌人應為加入作好準備。

終止關係的決定必須作出並執行。數家機構曾斷定某客戶風險過高，其後卻花了數月才結束帳戶，資金在此期間已被轉走。2025年後公認的標準是，終止關係的決定須在一段短而固定的期間內執行，資金只可退回來源帳戶。

新加坡視角

即使你的業務是一家資源只及銀行一小部分的DPT交易所，你亦會被要求達到一家已讀過2024年委員會報告的銀行的標準。實際的應對方法，是把委員會的結論當作核對清單，逐項對照你自己的開戶及監察程序，記錄你的管控措施在哪些方面符合標準，並能夠向MAS證明你在檢查人員提問之前已經這樣做。把報告視為銀行業事務的公司，已發現MAS並不這樣看。

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