牌照是甚麼，不是甚麼

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

數碼支付代幣牌照並非《2019年支付服務法》（PSA）下的一個獨立牌照類別。它是一個標準支付機構牌照或主要支付機構牌照，其範圍包括數碼支付代幣服務，並可能同時包括其他支付服務。將客戶的新加坡元兌換成代幣並將代幣發往海外的公司，通常會持有涵蓋DPT服務及跨境轉賬的牌照。發行新加坡元穩定幣並經營交易所的公司，則會結合電子貨幣發行與DPT服務。[1]實際要點是，申請按服務逐項評估。日後增加服務須提出更改申請，並須經過大致相同的審查，因此界定範圍時應考慮三年業務計劃。

牌照亦專屬於該實體，不能轉讓。根據該法第27條，控制權變動達20%或以上，須事先取得新加坡金融管理局（MAS）批准；根據第37條，委任行政總裁及董事亦然。[2]因此，如新加坡持牌人是外國交易所的附屬公司，其集團結構須在申請前設計妥當。MAS會穿透至最終控制人，並會要求提供母公司股東及高級管理層的適當人選資料，與要求申請人本身提供的資料相同。

註釋

1. PSA，第6(2)條及附表一第1部：牌照列明持牌人可提供的支付服務，持牌人在增加服務前必須申請更改牌照。 ↩

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2. PSA，第27條（持牌人的控制權：20%控制人批准）及第37條（批准行政總裁、董事及合夥人）。 ↩

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