兩套制度的分歧所在

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

下表列出集團若不作取捨，便無法對兩個實體適用同一規則的各個問題點。在每一行中，集團必須決定是全面適用較嚴格的標準，還是以書面劃定界線、分別運作兩套標準。

議題	新加坡（PSN02、CDSA）	瑞士（AMLA、AMLO-FINMA、SRO規例）	集團做法
偶發兌換交易的客戶盡職審查門檻	無門檻，每宗DPT交易均須進行客戶盡職審查	加密資產兌換為1,000瑞士法郎（AMLO-FINMA第51a條，SRO有相應規定）	如系統許可，全集團適用新加坡規則（無門檻）
實益擁有人門檻	以控制權為基礎，實務上為25%	控制人25%（AMLA第2a條第3款），K表格／A表格聲明	統一採用25%並以控制權為補充準則，兩個實體均使用瑞士表格
政治人物定義	外國政治人物一律採取加強盡職審查，本地及		統一定義，統一加強盡職審查

© 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.

議題	新加坡（PSN02、CDSA）	瑞士（AMLA、AMLO-FINMA、SRO規例）	集團做法
	國際組織政治人物按風險處理	結構相同（AMLA第2a條第1至2款），外國政治人物一律屬高風險	
紀錄保存	5年	10年（AMLA第7條第3款）	全集團10年
旅遊規則資訊範圍	1,500新加坡元以下適用簡化資訊	一律適用完整資訊	一律適用完整資訊
非託管錢包	按風險處理，鼓勵核實	須證明控制權	全集團須證明控制權
申報標準	知悉或有合理理由懷疑，CDSA第45條	有根據的懷疑（begründeter Verdacht），AMLA第9條，並經BGE 147 IV 274降低	統一上報程序，兩套申報程序
申報後凍結	無自動凍結，由機構作風險決定	只在洗錢舉報辦公室（MROS）於40個工作天內作出通知後才凍結（AMLA第10條、AMLA第23條第5款）	按司法管轄區處理
通風報訊	CDSA第57條，並無法定集團例外	AMLA第10a條，設有集團內例外（第3款）	見下文第6節的程序
制裁	聯合國制裁及對俄羅斯措施，商業上遵從OFAC	聯合國制裁及全面與歐盟接軌	按司法管轄區設篩查名單，程序統一
打擊洗錢審計	獨立審計職能，另加每年向MAS提交的核數師報告	由SRO或持牌審計公司進行年度打擊洗錢審計	協調審計日程，共用審計結果登記冊

© 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.

規律在於，新加坡在客戶開戶階段較嚴格（無門檻，每宗交易均須進行客戶盡職審查），瑞士則在轉賬及紀錄保存方面較嚴格（完整旅遊規則資訊、須證明控制權、十年保存期）。[1]集團若在每一行均採用較嚴格的規則，所得的計劃會超越兩套制度，並可據此在任何一方監管機構面前作出辯護。代價由客戶以不便的形式承擔，亦由機構以系統投入的形式承擔。根據我的經驗，大部分集團都接受這項代價，因為另一選擇，即以界線分隔的兩套標準，恰恰會產生檢查人員最先發現的各種不一致之處。

註釋

1. AMLA，第7條第3款（十年保存期）、第2a條第1至3款（政治人物及控制人的定義）；AMLO-FINMA，第51a條（加密資產兌換交易門檻1,000瑞士法郎，自2021年1月1日起由5,000瑞士法郎下調）；VQF，Regulations及用於確定實益擁有人及控制人的A、K、S及T表格。 ↩

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.

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. 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.

© 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.