規則的發展方向

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截至法律狀況基準日，可見三項發展。第一，財務行動特別組織（FATF）在其2024年及2025年的更新報告中表示，將就旅遊規則的實施及非託管錢包的處理向各司法管轄區施壓。這壓力可能促使新加坡金融管理局（MAS）收緊其以風險為本的做法，向較接近瑞士的控制權證明要求靠攏。[1] 第二，歐洲聯盟的《資金轉移規例》自2024年12月30日起適用，對加密資產服務提供者實施旅遊規則，不設門檻，並要求就超過1,000歐元的自託管錢包核實擁有權。因此，歐盟標準與瑞士標準相近，令新加坡面對更大的趨同壓力。[2] 第三，業界協議正在整合：IVMS 101已成為普遍採用的內容標準，少數網絡亦已實現互通，令不合規的營運藉口越來越站不住腳。

註釋

1. FATF, Targeted Update on Implementation of the FATF Standards on Virtual Assets and VASPs，2025年6月，有關旅遊規則執法的建議。 ↩
2. Regulation (EU) 2023/1113 of 31 May 2023 on information accompanying transfers of funds and certain crypto-assets，第14條及續後條文，自2024年12月30日起適用；參見第O部分第II章。 ↩

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