監管架構：MAS、《銀行法》、SFA、FAA及FSMA：實務影響

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對於希望從新加坡服務富裕客戶的外國集團而言，本章所述的架構可轉化為一連串具體決定。第一項決定涉及經營載體。根據《銀行法》取得的銀行或商人銀行牌照，准許的業務範圍最廣，審慎監管要求亦最嚴格。就基金管理或買賣取得的資本市場服務牌照，適合不接受存款的資產管理公司。財務顧問牌照則適合既不管理資產、亦不持有客戶款項的顧問公司。第E部分第V章討論的外部資產管理人，通常持有資本市場服務牌照，並與託管銀行合作。

第二項決定涉及客戶群。只服務認可投資者及機構投資者的公司可享有大幅豁免，但必須記錄每名客戶的身份，取得其選擇加入，並在情況改變時覆核其身份。服務零售客戶的公司，則必須全面遵守有關產品推介、披露及公平

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交易的操守規則。第三項決定涉及人員。每名提供意見、進行買賣或管理資產的人士，都必須獲委任為代表，並符合能力要求。每名高級管理人員都應有一份MAS可審查的書面職責範圍。

- 確定業務將進行的每項受規管活動，並將之對應《銀行法》、《證券及期貨法》（SFA）、《財務顧問法》（FAA）或《2022年金融服務及市場法》（FSMA）。
- 查核是否適用任何豁免，並緊記發牌豁免不影響操守責任。
- 把每名客戶分類為零售投資者、認可投資者或機構投資者，記錄認可投資者的選擇加入，並定期覆核分類。
- 透過公開登記冊委任所有代表，並在他們提供意見前核實其考試狀況。
- 為高級管理人員及重大風險人員繪製職責圖，並使薪酬與操守相配合。
- 執行新加坡金融管理局（MAS）的打擊洗錢公告，特別留意財富來源，並就私人銀行客戶遵從2026年5月的指引。
- 按照《銀行法》第47A條及FSMA的技術風險規定，檢討外判及科技安排。
- 根據《銀行法》第47條把客戶資料視為受保護資料，只透過法定途徑披露。
- 追蹤MAS發布的諮詢文件、公告及指引，因為大部分具體運作細節都載於其中。

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