2023至2026年执法报告及其揭示的情况

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MAS涵盖2022年7月至2023年12月的执法报告，记录了针对三箭资本（Three Arrows）的行动、若干持牌机构因反洗钱缺失而达成的和解，以及针对因涉及无牌代币业务的罪行而被定罪的个人发出的禁止令。涵盖2024年至2025年年中的报告，反映了对持牌数字支付代币机构群体进行监管的第一个完整期间，以及为《金融服务与市场法》制度生效所作的准备。报告还载有从调查到制裁平均所需时间的统计数据，复杂案件需要两到三年。[1]

综合来看，这些报告显示，这是一个以持牌机构群体为主要执法渠道、并把监管边界问题交给投资者警示名单和警方处理的监管机构。据我所知，MAS尚未因代币市场操纵提起民事罚款诉讼，也未因行为原因吊销任何数字支付代币牌照。它也没有公布过任何因违反消费者准入措施而达成、金额足以震慑大型交易平台的和解。因此，新加坡持牌数字资产公司的执法风险集中在反洗钱合规、技术风险管理以及与MAS往来时的诚实程度上。针对三箭资本的谴责和禁止令表明，向监管机构提供虚假信息是MAS惩处最重的违规行为。

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注释

1. MAS Enforcement Report July 2022 – December 2023及MAS Enforcement Report January 2024 – June 2025。 ↩

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