《2022年金融服务与市场法》第9部分下的MAS数字代币服务提供商制度

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数字代币服务提供商制度涵盖在新加坡境外提供数字代币服务、且尚未依PSA、SFA或MAS主管的其他法律取得牌照的新加坡境内人士。自2025年6月30日起，此类人士必须持有DTSP牌照，否则须停止有关活动；MAS已表明，仅在极其有限的情况下才会授予牌照。[1]因此，本清单首先要回答的问题是：该制度究竟是否适用，以及重组是否为更佳选择。决定申请的集团，应预期其所受审查与PSA牌照同样深入，此外MAS还会追问，为何该业务不能在现有牌照下开展。

核对清单

- 梳理新加坡境内任何人士（雇员、董事、承包商）提供的每一项数字代币服务，并确认是否有任何服务提供给新加坡境外人士。

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- 确定该新加坡实体或个人是否已依PSA、SFA、《财务顾问法》或其他法律取得牌照、获得豁免或受到监管；如是，则第9部分不适用。
- 如第9部分适用，且有关活动在2025年6月30日后仍无牌照继续进行，应就所涉风险征询意见，并考虑主动与MAS接洽。
- 评估重组方案：将受监管活动转移至持牌的瑞士实体或其他实体，将新加坡实体限于不受监管的集团服务，并记录新加坡境内无人从事洽谈、开户、执行或托管。
- 如申请：准备商业计划、关于该活动为何不能在PSA或SFA牌照下进行的说明，以及海外客户所在司法管辖区本地监管的分析。
- 证明25万新元的基本资本，并满足常驻董事和合规官的要求。
- 准备与《2022年金融服务与市场法》DTSP通知及FATF关于虚拟资产服务提供商的标准一致的AML/CFT框架，包括针对海外客户实施旅行规则。
- 准备技术风险及网络卫生文件。
- 准备治理及适当资格文件。
- 为年费及持续义务编列预算，这些义务与MPI的义务相同。

注释

1. Financial Services and Markets Act 2022，第136–141条；MAS, Response to Feedback Received，2025年5月30日，第2.1–2.6段；参见第K部分第V章。↩

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