新加坡RCASP的义务

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新加坡RCASP必须确定自己是否在适用范围之内；对持牌DPT服务提供者或DTSP牌照持有人而言，答案几乎总是肯定的。随后，它必须对每位用户进行尽职调查：取得个人和实体的税务居民身份自我证明，识别消极实体的控制人，并对照已持有的反洗钱信息进行合理性核查。既有用户必须在过渡期内（通常为开始实施后的十二个月）完成文件记录。RCASP必须每年按OECD的XML格式向IRAS申报，为与CRS周期一致，申报期限很可能是申报年度次年的5月31日。[1] 不遵守规定即构成《所得税法》国际税务合规条文下的罪行，实体以及未尽合理注意义务的高级职员均会被处以罚款。[2]

与反洗钱尽职调查的重叠，正是组织完善的RCASP可以利用的效率所在。MAS第PSN02号通知规定的客户尽职调查，已收集姓名、地址、出生日期、国籍和身份证明文件，并已识别实体客户的实益拥有人（参见第L部分第II章）。CARF在此基础上增加了税务居民身份和税务识别号，并要求自我证明采取由用户签署或确认的形式。一次性收集两套数据的合并开户表格是标准做法。本部分第III章所述的GST归属地证据也可取自同一来源。在两个中心各有一家RCASP的瑞新集团，应采用一个CARF数据模型和两条申报流程，因为瑞士和新加坡的格式都是OECD格式，区别仅在于传输渠道。

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实务提示

如果您在新加坡经营一家交易所，在楚格另有一家姐妹交易所，那么CARF开户流程只需建立一次，即可重复使用。在开户时收集自我证明，按照OECD的税务识别号规则验证其格式，将居住司法管辖区作为结构化字段存储，并将每条交易记录与用户在交易日的居住地相关联。将年度汇总建成两家实体都能运行的报告。在每家实体指定一名CARF负责人，因为两项制度都要求由具名个人负责。在首次申报前，用OECD的验证工具测试XML输出。在2025年和2026年做好这些工作的集团，就能避免CRS在2017年和2018年造成的手忙脚乱。

注释

1. OECD，Crypto-Asset Reporting Framework，第III节（既有及新个人和实体用户的尽职调查；自我证明的有效性），以及CARF XML Schema and User Guide，2024年。 ↩
2. Income Tax Act 1947，第20B部分（改善税务合规的国际协议），特别是适用于申报金融机构的罪行和处罚条文，以及根据CARF条例适用于申报加密资产服务提供者的相应条文。 ↩

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