在新加坡开立银行账户

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2025年之后的状况

新加坡三家本地银行（星展银行DBS、华侨银行OCBC、大华银行UOB）以及持牌外资银行对数字资产企业进行行业风险评估。自2022年一系列崩盘事件以来，这一评估在各金融中心中属于最为保守之列。MAS曾公开表示，它并未指示银行拒绝该行业的客户，并期望银行根据每位客户的具体情况进行评估。新加坡银行公会于2023年就应予权衡的因素发布了指引。[1]在实践中，银行在2026年的立场是愿意考虑三类公司：持有MAS牌照或原则性批准的公司；业务不在监管范围之内、资金为来源明确的法定货币的公司；以及受监管集团的子公司。银行会拒绝以下公司：无牌经营代币业务的公司、已申请牌照仍在等待审批的公司，以及资金库设在链上的公司。

DTSP制度改变了第IV章所述“仅服务海外客户”模式的利弊计算。2025年6月30日之前，一家只服务外国客户的新加坡公司可以向银行表明自己不受监管且合法经营。此后，它要么作为DTSP取得牌照（MAS只在极为有限的情况下发放），要么属于非法经营。没有任何新加坡银行会为后者开立或保留账户。[2]曾采用该模式的集团已将相关业务迁往瑞士、香港或迪拜，只在新加坡保留一家为集团提供服务的公司，并以此为基础办理银行业务。

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新加坡银行的要求

新加坡的开户材料与瑞士类似，但多出三项要求。银行要求提供MAS牌照，或证明无需牌照的法律意见书，而且银行会认真阅读该意见书。银行要求提供公司自身的反洗钱政策以及合规官的姓名和资质，即使公司不在监管范围之内也是如此，因为新加坡银行公会的指引将公司的合规文化视为一项风险因素。此外，银行还要求提供交易监控方案，说明公司将如何发现可疑活动并向银行报告，这在实践中意味着承诺使用一家区块链分析服务商。对于满足要求的公司，开户需时两至四个月；对于不满足要求的公司，则遥遥无期。

新加坡视角

瑞士集团为其新加坡子公司开户时，应如实介绍该子公司：一家由受监管或隶属SRO的瑞士母公司拥有的服务公司，拥有明确的交易对手群体和雇员薪资名册。母公司的FINMA或SRO身份是整份材料中最有用的文件。子公司在第一年不应计划通过其新加坡账户接收代币兑换款项，这些款项应经由瑞士母公司处理。待子公司取得牌照，或拥有一年清白的法定货币往来记录后，才可以开始商谈链上资金流入的问题。

注释

1. MAS就银行对数字资产企业“去风险”问题答复国会质询（2022年和2023年）；新加坡银行公会，“Industry Guidance on Managing Risks of Digital Payment Token Service Providers”，2023年。第L部分第V章。↩
2. Financial Services and Markets Act 2022，第9部分，第137条（禁止未持牌在新加坡境外提供数字代币服务），于2025年6月30日生效；MAS，“Response to Feedback Received on Proposed Regulatory Approach for Digital Token Service Providers”，2025年5月30日，第2.5段。第K部分第V章。↩

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