从整体上理解这一制度

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

新加坡DPT公司的合规官同时与五个层面打交道。刑事法令规定罪行和个人责任风险。MAS通告规定义务。指引规定预期的方法。国家风险评估描绘风险图景。FATF出版物提供术语体系并指明发展方向。这些层面都不能孤立地解读。下面通过一个实例说明它们如何结合。

示例

一家新加坡主要支付机构接纳了一名企业客户。该客户在英属维尔京群岛注册成立，其董事居住在第三国，所申报的业务为"数字资产财资管理"。该客户希望将价值200万新元的USDT兑换为新加坡元，再转入一个新加坡银行账户。根据PSN02，公司必须识别并核实该客户及其实益拥有人，了解其所有权和控制结构，并确定业务关系的目的和资金来源。由于该结构涉及一家拥有非居民董事的离岸公司以及一种高风险产品，因此适用强化尽职调查。根据国家风险评估，离岸法人、稳定币和兑换为法定货币三者的结合，符合一种优先关注的类型。根据CDSA，如果公司高级职员在未消除危险信号的情况下继续办理，而资金后来被证明是诈骗所得，他们便要面对一个问题：他们是否有合理理由相信该财产属于犯罪行为所得利益。根据TSOFA，以联

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

合国和新加坡的指认名单对该董事进行筛查，是能否继续办理的前提条件。只有五个层面的要求全部满足，接纳该客户的决定才属合法，而档案必须能够证明这一点。

本部分其余内容将按照这一顺序贯穿客户关系的整个生命周期，然后转向30亿新元案的制度性教训、制裁、合规职能的组织，最后讨论跨境集团。

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

Author contact: Dr Alexander Ressos, TEP · contact@ressos.com