依赖第三方

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PSN02允许公司依赖第三方执行CDD中的识别、核实和目的环节。须满足三项条件。第三方本身必须遵守符合FATF标准的AML/CFT要求并就此受到监管。公司必须立即取得CDD信息，并必须能够应要求毫不延迟地取得相关原始文件。公司仍须对结果负责。[1]持续监控不得根据依赖条款交由第三方执行，但可以根据外包指引作为一项服务外包（第VII章）。公司必须对第三方的评估形成书面记录，并定期复核。

依赖第三方主要涉及两种情形。第一种是集团内部：一家新加坡MPI依赖其楚格关联公司对共同客户所做的CDD。此时的问题是，楚格关联公司作为《瑞士反洗钱法》（GwG/AMLA）下瑞士自律组织的成员，是否满足"遵守并受监管"的标准。我认为满足，因为FATF承认SRO监管是对瑞士金融中介的充分监管；但新加坡公司必须将这一看法记录在案，并且仍须自行进行筛查和监控。第VIII章将展开论述这一点。第二种情形是依赖带来客户架构的介绍经纪商或持牌信托公司。新加坡公司不得只接受介绍方提供的摘要。它必须自己持有识别数据，并必须能够在检查时出示相关文件。

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CDD要素	标准（PSN02第6段）	简化（第7段）	强化（第8段）
识别并核实客户	须在建立关系或交易之前完成	须完成，深度降低	须完成
实益拥有人	识别，合理核实	识别，对低风险实体可依赖公开登记册	识别并核实，附架构图
目的和性质	须查明	可从产品推断	详细记录
资金来源	风险需要时	通常不需要	须查明
财富来源	通常不需要	不需要	须查明
高级管理层批准	不需要	不需要	开立及继续关系均须批准
审查频率	2–3年，另加触发式审查	周期较长	每年一次，另加触发式审查
筛查	开户时及定期	开户时及定期	开户时、定期，并强化负面媒体筛查

注释

1. MAS Notice PSN02，第9段（由第三方执行措施）。 ↩

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