制裁与律师

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在新加坡就制裁问题为DPT持牌机构提供咨询的律师，必须同时兼顾三个司法管辖区。新加坡层面决定什么行为违法，以及什么必须冻结和报告。美国层面决定什么会导致美元体系对机构关上大门。如果客户在瑞士或欧盟设有关联公司，瑞士或欧盟层面则决定集团的另一实体不得做什么。由此得出的咨询意见往往是：一笔在新加坡合法的交易，因其在其他地方的后果而应予拒绝。如果将这一意见表述为有书面政策支持的商业决定，客户会比面对一项实际上并不存在的法律禁令时更容易接受。准确说明哪一层面禁止什么，正是律师的价值所在。第O部分第IV章和第VI章将这些问题置于更广泛的国际背景中加以讨论。

实务提示

借助以下五项控制措施，您可以将新加坡DPT持牌机构的制裁风险降至可控水平。- 每次名单更新时，对照联合国、新加坡、OFAC、欧盟和英国名单进行名称筛查，并测试转写处理能力。- 对照被指定地址和已归属集群筛查每一个链上交易对手地址，并为间接敞口设定有书面记录的门槛。- 任何被归属于朝鲜的敞口，无论跳数多少，一律视为必须冻结并报告。- 监控您所

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持代币的稳定币发行人的冻结名单，并在托管条款中将发行人冻结风险分配给客户。- 保存制裁决定日志，记录每一次命中、命中所涉名单、所采取行动的法律依据以及采取行动的人员。MAS首先要求查阅的就是这份日志。

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