新加坡数字支付代币服务主要支付机构牌照

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

MPI路线图假设一家新加坡公司申请提供DPT服务的牌照，客户包括零售和机构客户，集团母公司位于瑞士。申请程序通过MAS的在线门户办理，MAS公布的服务标准是在收到完整申请后六个月内作出决定。但2020年以来的经验表明，DPT申请人更常见的等待时间是十二至十八个月，原因在于MAS会连续多轮提出问询，而且许多申请人提交的反洗钱和技术文件并不完整。[1]

阶段	内容	所需时间	官方收费	专业服务和审计费用
1	注册公司、本地居民董事、办公室、银行账户	4–8周	ACRA注册费315新元	3,000–8,000新元，如使用名义董事另加相关费用
2	与MAS支付部门的申请前会议（非强制，但建议进行）	安排需时2–4周	无	5,000–15,000新元

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阶段	内容	所需时间	官方收费	专业服务和审计费用
3	申请材料：商业计划、反洗钱／打击资助恐怖主义框架、技术风险管理、托管与资产保障、消费者保护、公司治理	10–20周	无	80,000–200,000新元
4	资本与保证金	发牌前	基本资本250,000新元；按交易量缴纳保证金100,000新元或200,000新元	—
5	MAS审查、多轮问询、面谈	9–18个月	每项支付服务申请费1,000新元（参考）	答复问询及面谈准备30,000–80,000新元
6	原则性批准及附加条件；发放牌照	1–3个月	DPT服务年度牌照费10,000新元（参考）	—
7	第一年：依据PSN02和《支付服务条例》进行年度审计、合规官、技术风险管理审计	持续	年费	审计40,000–100,000新元；合规人员费用

新加坡程序有三个特点有别于瑞士程序。第一，MAS会面谈董事和合规官，亲自考察他们对反洗钱框架的理解。第二，MAS要求合规官居住在新加坡并受雇于公司，这意味着在产生收入之前就要支付薪酬。第三，2020年以来提交的DPT申请，多数被MAS拒绝或退回，因此预算中应考虑第二次申请或撤回后重新提交的可能性。[2]

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新加坡视角

在申请前会议上，您会被问到为什么选择新加坡。MAS希望听到与亚洲客户、亚洲机构交易对手或新加坡本地人才相关的商业理由。“因为新加坡是一个良好的司法管辖区”这样的回答，只会导致程序进展缓慢。如果集团的客户在欧洲，应预料到MAS会问：为什么不由瑞士实体为这些客户提供服务？申请新加坡牌照是否只是为了它的名声？

注释

1. Payment Services Act 2019第6条和第9条；Payment Services Regulations 2019第2部分（申请）及附表一（收费）；MAS, Guidelines on Licensing for Payment Service Providers, PS-G01；参见第K部分第II章和第X章。 ↩
2. 关于MAS公布的《支付服务法》申请统计数据及DPT持牌机构数量，参见第K部分第II章和第I部分第IV章。 ↩

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

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