第四阶段：独立评估

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独立评估是由外部机构（通常是审计事务所或专业咨询公司）出具的报告，评估申请人的AML/CFT框架是否充分；对于DPT申请人，还评估其技术风险和托管安排是否充分。MAS规定评估范围，并期望评估人检验框架的实际运行情况，而不仅仅是书面文件。[1]报告必须在原则性批准之前提交，因此其时间安排是最常见的延误原因。在政策定稿后委托的评估需时两至四个月。在政策定稿前委托的评估会得出附保留意见的报告，并且必须重做。

注释

1. MAS, Guidelines on Licensing for Payment Service Providers (PS-G01)，关于对申请人AML/CFT框架进行独立评估的部分，以及2024年修订后对DPT申请人扩大的评估范围。 ↩

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