第一阶段：准备与申请前沟通

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

准备阶段决定申请结果。新加坡金融管理局并不当然地安排申请前会议，但会答复书面咨询函，只要该函阐明拟开展的业务，并询问适用哪一牌照类别和哪些服务。若咨询函提出实质性问题，MAS会与申请人会面。咨询函应简短、具体，并如实说明商业模式，因为MAS会保存往来函件，并将其与申请材料相比对。[1]如果咨询函描述的是托管业务，而申请材料描述的却是交易所，必然会受到质询。

申请人应利用准备阶段解决五个问题。第一是法律实体：一家在新加坡注册成立的公司，或一家在新加坡登记的外国公司，须设有固定营业场所，董事会须满足第II章所述的居住要求，股本须达到基本资本要求。[2]第二是管理团队：首席执行官、合规官和技术主管须居住在新加坡，具备受监管金融服务行业的经验，并在申请前获委任且在申请中列名。第三是整套政策文件，包括按照PSN02制定的AML/CFT政策、对应TRM Guidelines和PSN05的技术风险框架、符合2024年条例的托管与资产隔离政策，以及如拟服务零售客户，则还包括PS-G03规定的消费者保护措施。第四是独立评估人，应尽早聘请，使评估与申请同步进行。第五是商业计划，其中的三年财务预测须与所申请的牌照类别相吻合。

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核对清单

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注释

1. MAS, "Guidelines on Licensing for Payment Service Providers" (PS-G01), 关于申请前阶段以及MAS期望在提交申请前获得的信息的部分。 ↩
2. mas.gov.sg上的MAS "Standard Payment Institution Licence"页面，资格标准：在新加坡注册成立或登记、固定营业场所或注册办事处、10万新元的基本资本，以及董事会组成要求。 ↩

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

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