PSN02的结构

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新加坡金融管理局（MAS）第PSN02号通告的编排顺序与MAS所有其他AML/CFT通告相同，从银行法通告（MAS第626号通告）到适用于资本市场中介、信托公司和保险公司的通告，莫不如此。熟悉其中一份，就熟悉了所有通告的骨架。通告开篇是定义和适用范围，接着阐明基本原则，要求进行全企业风险评估并采用风险为本的方法，并处理新产品和新技术问题。随后，通告分三个层级（标准、简化、强化）规定客户尽职调查（CDD），接着是依赖第三方、价值转移、记录保存、个人数据和可疑交易报告。最后是内部政策、合规、审计和培训。[1]这一结构既有监管意义，也有教学意义。它告诉合规官，MAS期望公司按照怎样的顺序思考问题。

PSN02有两个特点使其区别于同类通告。第一，它适用于每一笔数字支付代币（DPT）交易，不论金额大小。PSN01允许支付服务提供商在2万新元的偶发交易门槛以下，无需进行完整的CDD即可为临时客户办理业务，而PSN02中没有对应的门槛。DPT服务提供商为尚未与其建立业务关系的客户办理任何交易，都必须在交易前对该客户进行CDD。[2]MAS于2019年采取这一立场，超越了FATF对偶发虚拟资产交易设定的1000美元/欧元的底线，理由是

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DPT转移的假名性使任何门槛都会诱发拆分交易。第二，价值转移要求（旅行规则）同样适用于所有DPT转移，同样不设最低金额，只是在1500新元以下适用较简化的信息要求。第III章讨论这一规则。

这对商业模式造成的后果是严重的，而且是有意为之。希望在门槛以下匿名服务客户的DPT自助终端、场外交易柜台或非托管兑换界面，在新加坡没有生存空间。每一位客户都必须是已知客户。来自设有最低限额规则的司法管辖区（包括设有1000瑞士法郎兑换门槛的瑞士）的公司，不得不相应地重新设计客户开户流程（瑞士规则参见第F部分第III章）。

注释

1. MAS Notice PSN02, Prevention of Money Laundering and Countering the Financing of Terrorism – Digital Payment Token Service，经修订后第1–17段的结构；其顺序与适用于银行的MAS Notice 626及适用于资本市场中介的MAS Notice SFA04-N02相同。 ↩
2. MAS Notice PSN01，第6段（CDD触发条件，包括特定支付服务2万新元的偶发交易门槛）；MAS Notice PSN02，第6段（DPT服务的CDD触发条件，不设金额门槛）；MAS, Response to Feedback Received on the Proposed AML/CFT Notices under the Payment Services Act，2019年12月5日。 ↩

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