报告的时效与质量

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法规的表述是“在合理可行的范围内尽快”。MAS的指引将其转化为一项期望：机构对警报的内部调查应在较短且有记录的期限内完成，并在同一时间窗口内作出并执行报告决定。在监管实践中，MAS曾提及，对大多数案件而言，自警报上报至合规部门起15个工作日为最长期限；如资金仍在机构控制之下且可能被转移，则应更快报告。[1] 机构的程序应确定该期限，记录警报日期、上报日期、决定日期和提交日期，并说明任何延误。检查人员会抽查登记册并计算各环节的间隔时间。

质量与时效同等重要。STRO一再表示，有用的可疑交易报告应当：指明各方当事人；载明交易的日期、金额和交易对手；结合客户画像说明该活动为何可疑；并附上证明文件。[2] 对于DPT机构，报告必须包含链上数据，即地址、交易哈希值、分析工具的归属判断和风险评分，以及法定货币端的资金流转及其银行信息。报告通过STRO在线通知与报告平台（SONAR）提交，该平台接受结构化数据和附件。一份仅写着“客户行为异常，见所附对账单”的报告属于防御性报告，它能保护报告官员免于触犯第45条的罪行，但对其他任何人都毫无帮助。STRO的分析人员每年要分拣数以万计的报告，内容单薄的报告会被排在最后。

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防御性报告

凡事都报告的冲动可以理解：第45条的罪行针对个人，标准是客观的，而一份不必要的报告看似成本很低。MAS和STRO都不鼓励这种做法，原因有三。第一，防御性报告会淹没真正有价值的报告，从而降低情报全景的质量。第二，它向MAS表明机构的分析人员缺乏辨别能力，这本身就是对机构控制措施的不利认定。第三，如果提交防御性报告后未对业务关系作出决定，机构就会陷入最糟糕的境地：它已告知当局其怀疑该客户，却仍与之继续交易。正确的做法是认真调查，像记录提交报告的理由一样仔细地记录不报告即关闭警报的理由，并在作出报告决定的同时，对该客户作出决定。

注释

1. Guidelines to Notice PSN02，可疑交易报告一节，关于报告的及时性；MAS在其针对银行的反洗钱/打击恐怖主义融资指引中表示，期望在转介至合规部门后15个工作日内提交报告，并已在各行业适用同一基准。 ↩
2. Suspicious Transaction Reporting Office, STR Quality Guidance以及SONAR电子申报用户指南，关于STR应包含的内容；STRO Annual Report最新版，关于所收到STR的数量。 ↩

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