员工培训、筛查与合规文化

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PSN02要求机构在招聘前对员工进行诚信筛查，并在入职时及此后定期为其提供AML/CFT培训，培训内容须针对各自岗位量身定制。[1]对于DPT机构而言，培训必须涵盖链上维度。员工必须学会如何解读链上分析报告，如何识别会触及一线的诈骗类型，了解旅行规则如何运作，以及在以聊天为主的客户支持环境中"泄密"（tipping-off）意味着什么。MAS的检查人员会约谈一线员工并测试其知识。一名无法解释提款为何被暂扣的客服人员，等于向检查人员展示了培训上的缺失。而一名告诉客户"合规部门标记了您"的客服人员，仅用一句话就暴露了泄密风险。

合规文化较难检查，但MAS仍会尝试。《个人问责指引》和执法记录显示了MAS关注的重点。它会询问：合规部门的意见是否曾被业务部门否决，薪酬是否只奖励业务量而不顾风险，员工能否提出疑虑。如果一家DPT初创企业的创始人把合规视为取得牌照的成本，那么其合规官将无法坚守底线，而档案也会反映出这一点。根据我的经验，与MAS打交道最顺利的创始人，是那些已经接受合规职能是产品组成部分的人。机构的银行关系、机构客户以及牌照本身，都取决于此。

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实务提示

对于一家规模约三十人的新加坡DPT持牌机构，您可以按以下方式搭建合规职能，使其满足MAS的要求。任命一名常驻新加坡、具备链上分析能力的合规官，由其向董事会汇报，并以书面形式赋予其阻止交易的权利。为合规官配备至少两名负责监控和筛查的分析师，并按书面规定的比例随交易量扩充团队。每年聘请外部审查机构进行独立审计，授权其对档案进行端到端测试。每季度召开一次有董事会成员出席的合规委员会会议，并将有关风险评估、STR统计、审计发现及监管变化的讨论记入会议纪要。政策体系应以一份核心AML/CFT计划文件为主，针对PSN02的每一主题另设附件。每份附件都应注明其所落实的通知条款。以这种方式组织的机构，能够在检查人员提问的当天回答每一个问题。

注释

1. MAS Notice PSN02，第16段，关于员工招聘与培训。 ↩

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