数字支付代币持牌机构应从该案中汲取的教训

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委员会报告和2025年的罚款，确立了MAS目前对每一家受监管机构，包括DPT持牌机构，适用的标准。其中有六点可以直接套用。

财富来源必须以独立证据加以佐证，佐证程度应与风险相称。一份声明和一家公司自身的财务报表不构成佐证。纳税申报表、由无关联审计师审计的账目、受监管银行出具的银行对账单、买卖协议和监管申报文件，才构成佐证。

来自较高风险司法管辖区的文件必须经过认证。被告使用了伪造的中国税务文件和银行推荐函。凡是向出具机构核实过这些文件的银行，都本可发现伪造行为。为来自此类司法管辖区的企业客户开户的DPT持牌机构，应当为档案中每一份具有分量的文件制定核实程序。

多重国籍和近期通过投资取得的公民身份，都是需要作出解释的风险指标。委员会并没有说应当拒绝此类客户。它所说的是：新护照、与护照签发国联系薄弱，再加上申报财富来自较高风险行业，这一组合需要进行强化尽职调查，而当时所做的尽职调查并未达到应有的深度。

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危险信号必须得到跟进，跟进过程必须记录在案。数家银行曾就被告的账户生成警报，却以不充分的理由予以关闭。MAS在罚款决定中将警报处置的质量列为一项违规。

信息必须串联起来。在机构内部，开户团队、监控团队和客户经理必须共享各自所知。在机构之间，银行已有COSMIC平台可用，MAS也已表示可能扩大其适用范围。尚未加入的DPT持牌机构应做好加入的准备。

终止业务关系的决定必须作出并付诸执行。数家机构在认定某客户风险过高后，又花了数月时间才关闭账户，资金在此期间已被转移。2025年后的公认标准是：终止业务关系的决定须在短暂而固定的期限内执行，资金只能退回来源账户。

新加坡视角

即使您的业务只是一家资源仅及银行一小部分的DPT交易所，您也将被要求达到一家已经研读过2024年委员会报告的银行的标准。务实的应对之道是：把委员会的调查结论当作清单，逐项对照自己的开户和监控流程；记录您的控制措施在哪些方面达到了标准；并能够向MAS证明，您在检查人员提出要求之前就已经这样做了。那些把报告当作银行业事务看待的机构已经发现，MAS并不这么看。

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