诚信冲击：一马发展公司与2023年洗钱案

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

一个金融中心依赖的，是那些永远不会亲自查验它的人的信任。存款人、交易对手、代理行和外国监管机构都假定，流经新加坡的资金已经由了解客户的机构以及了解这些机构的监管者查核过。过去十年间，这一假定曾两度在公众面前经受考验。2015年至2017年，马来西亚国家投资基金一马发展公司的资金遭挪用一事揭示，新加坡的私人银行家曾为该基金的相关人士转移数以亿计的美元。2023年8月，警方同时展开突击搜查，逮捕了十名外国公民，并扣押或冻结了最终超过30亿新元的资产。这是全球有史以来规模最大的反洗钱行动之一。

本章考察这两宗案件及其引发的应对措施。首先讨论一马发展公司的资金如何流经新加坡银行，以及针对个别银行家的刑事案件。随后介绍新加坡金融管理局的监管行动：MAS关闭了两家银行，并处罚了另外六家。第三节转向2023年的案件、其后跨部门委员会的工作，以及MAS在2025年7月对九家机构施加的处罚。第四节总结客户开户和财富来源查核方面的教训，第五节则探讨为何金融中心的声誉已成为明确的监管对象。

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日内瓦卷从另一面讲述了同一个故事。该卷关于打击洗钱的一章记载，瑞士金融市场监督管理局对BSI和Falcon采取了行动，而这正是MAS在新加坡关闭的那两家银行；瑞士的BSI银行因此被一家竞争对手吞并。[1]由此可见，两个中心通过同样的机构暴露于同一个计划之下。本章末尾所述两地的应对措施，既显示了共同的标准，也显示了两种截然不同的执法风格。

要点

马来西亚基金一马发展公司于2009年成立后，有超过45亿美元被挪用，其中部分资金流经新加坡的私人银行。MAS于2016年5月关闭了BSI银行的新加坡业务，于2016年10月关闭了Falcon银行的新加坡业务，对八家银行合计罚款2910万新元，并对多名银行家施加了最长终身的禁令。法院以洗钱、伪造、欺骗以及未报告可疑交易等罪名判处个别银行家有罪。2023年8月的案件导致十人被定罪、超过9.4亿新元被没收，跨部门委员会于2024年10月发表报告，并出台了新的反洗钱立法。2025年7月，MAS对九家机构处以合计2745万新元的和解罚款（composition），认定这九家机构均未跟进其客户财富来源方面的警示信号。

注释

1. Ressos, *Genève, place financière internationale*，第H部分第IV章，« Les affaires qui ont marqué la place »一节，关于FINMA于2016年5月24日针对BSI作出的决定，以及FINMA于2016年10月11日就一马发展公司事件针对Falcon发布的公告。↩

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

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