作为监管目标的声誉

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

作为国家资产的信任

新加坡将其金融中心的声誉视为一项公共资产，可与其货币或港口相提并论。跨部门委员会在报告开篇即写道，信任是“稳健的金融中心和商业枢纽的基石”。[1]同月稍后发布的《国家反洗钱战略》指出，打击非法资金流动可以巩固新加坡作为可信赖国际金融中心的声誉。[2]

原因在于新加坡自身的处境。一个没有自然资源的小国，有赖于外国企业和外国政府愿意信任其机构。一旦失去这种信任，代理行业务、外国监管机构的合作意愿，以及构成该中心主体的合法企业的决策，都将受到影响。因此，背上“脏钱”的名声，代价将由整个经济承担，远远超出涉事机构的范围。

促进与监管集于一身

这两次冲击也检验了新加坡体制中第C部分第V章所描述的一个特点。MAS既是金融业的监管者，又是负责推动金融业发展的机构。批评者认为其中存在利益冲突，因为一个招揽财富的监管者可能不愿惩处那些带来财富的机

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

构。两起案件的记录却表明情况恰恰相反。在一马发展公司案中，MAS关闭了两家银行，并处罚了另外六家，其中包括本地最大的银行。2025年，MAS处罚了三大本地银行集团之一的大华银行集团，以及一些最知名的国际私人银行。

法定架构支持这一取向。正如第E部分第I章所解释的，根据《金融管理局法》，金融中心的发展从属于其稳健性。这两起案件表明，MAS在关键时刻确实贯彻了这一主次关系。它们同时也显示出监管的局限：在两起案件中，不当行为都持续了多年才被发现。

2026年金融行动特别工作组评估

外部检验来自FATF的相互评估。2016年的上一轮评估认定新加坡拥有强有力的法律和制度框架。[3]2026年5月6日发布的第五轮评估报告认定，新加坡拥有“稳健而有效的反洗钱框架和程序”。报告将新加坡列入常规后续跟进程序，即适用于表现良好成员的程序；MAS称，这比2016年的结果有所进步。[4]

FATF也指出了有待改进的领域。某些行业对扩散融资风险的认识有待提高，其中包括外国船旗国的代表处。新加坡还可以加强针对外国法人和外国法律安排的风险缓解措施。[5]第二点与2023年的案件直接相关，因为外国公司在该案中扮演了核心角色；这一点也关系到第E部分第IV章所探讨的信托结构。

保持警惕的代价

更严格的制度是有代价的。客户准入耗时更长，档案越来越厚，一些合法客户也觉得相关要求过于干涉隐私。政府已公开承认这种张力，委员会坚持风险为本的方法便是明证。目前的平衡力求对财富庞大、来得快且难以解释的客户施以最严格的审查，同时让普通客户能够在合理时间内获得服务。

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

第E部分第III章所探讨的家族办公室激励措施，是张力最为明显之处。单一家族办公室的迅速增长为新加坡带来了大量新财富，而2023年的突击搜查则使公众将目光转向对这类办公室创办人的审查。第E部分第III章描述了这些激励措施的条件如何演变。这段插曲印证了本章的总体教训：一个向全世界富人推销自己的金融中心，必须预料到其中一些人会试探其防线。其声誉则取决于它如何应对。

注释

1. Inter-Ministerial Committee on Anti-Money Laundering，*Report*，2024年10月，Foreword：“Trust is the cornerstone of a sound financial centre and business hub.” ↩
2. Monetary Authority of Singapore，*National Anti-Money Laundering Strategy*，2024年10月30日，第1章：该战略针对非法活动和非法资金流动，并“reinforces Singapore’s reputation as a trusted international”金融中心和商业枢纽。↩
3. Inter-Ministerial Committee on Anti-Money Laundering，*Report*，2024年10月，“What is the Financial Action Task Force?”专栏：在2016年的相互评估中，FATF评估新加坡“to have a strong legal and institutional framework to fight money laundering and terrorism financing”。↩
4. Monetary Authority of Singapore，“Singapore has a robust framework for combatting financial crime, according to international body”，新闻稿，2026年5月6日（mas.gov.sg，2026年11月访问）：FATF认定新加坡拥有“a robust and effective framework and process to counter money-laundering”；新加坡被列入常规后续跟进程序，较其2016年第四轮评估结果有所进步。↩
5. Monetary Authority of Singapore，“Singapore has a robust framework for combatting financial crime, according to international body”，2026年5月6

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

日：有待改进的领域涉及外国船旗国代表处等行业对扩散融资风险的认识，以及针对外国法人和外国法律安排的风险缓解措施。↩

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

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