情景四：诚信危机

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先例

第四种情景以第E部分和第H部分所述的威胁为出发点，探讨如果其中一种威胁以更大规模成为现实，将会发生什么。新加坡在不久前已两度经历诚信冲击。在第E部分第VI章所探讨的一马发展公司事件中，美国司法部认定，有超过45亿美元从这家马来西亚国家基金被挪用。[1]由于部分资金曾经过新加坡的银行，金融管理局对八家银行处以总计2910万新元的罚款。[2]在2023年8月的洗钱案中，警方扣押了价值超过30亿新元的资产或对其发出禁止处置令，跨部门反洗钱委员会称这是全球规模最大的反洗钱打击行动之一。[3]2025年7月4日，金融管理局因九家金融机构在该案中违反反洗钱要求，对其处以2745万新元的罚款。[4]

国际社会对新加坡应对措施的评价是正面的。金融行动特别工作组于2026年5月6日发布的相互评估报告，将新加坡列入常规后续跟进，这一程序专门适用于表现良好的成员。报告也指出了有待改进的领域，包括传统标准适用范围以外行业对扩散融资风险的认识，以及对来自外国法人和法律安排的风险的缓释。[5]第H部分第III章对该报告作了详细探讨。

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危机将如何展开

这一情景中的诚信危机规模大于以往先例，并触及金融中心的核心。有几种触发因素是可信的。某个家族办公室架构可能被发现曾充当一个邻近大国贪污所得的载体。某家大宗商品贸易公司可能被发现曾通过新加坡实体系统性地组织规避制裁，正如第H部分第II章所述的2020年倒闭事件在贸易融资欺诈这一不同领域所显示的那样。某个与新加坡有关联的加密资产平台可能倒闭，令遍及亚洲的客户蒙受损失。某家银行可能被发现多年来一直为一个受制裁国家处理交易。

其后果将遵循一种已知的模式。外国当局，首先是美国当局，会展开调查，并对涉事机构处以罚款。代理行会减少对受影响行业中新加坡实体的风险敞口。国际媒体会把新加坡描述为非法资金的避风港，而这正是这座城市数十年来竭力避免的叙事。重视隐秘性的客户会问，自己的事务是否可能被卷入公开程序；重视声誉的客户则会问，与新加坡的关联是否已成为一种负担。政府会以立法和执法作出回应，而这将提高每一家合法企业的经营成本。

为何仅有应对能力还不够

新加坡应对此类危机的能力很强。其政府行动迅速，监管机构拥有广泛权力，法院处理金融犯罪高效。对2023年案件的应对展示了这种能力：三个月内成立跨部门委员会；发布一份报告，按主动预防、及时发现和有效执法三个方面提出建议；就企业服务提供商和洗钱问题出台新的立法；并对相关机构处以罚款。委员会主席英兰妮在报告开篇写下的一句话，概括了第四种情景的利害所在："信任是一个稳健的金融中心和商业枢纽的基石。"[6]她补充说，新加坡将继续欢迎合法投资者，同时保持警惕，"以免玷污我们来之不易的受信任商业枢纽的声誉"。[7]

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应对能力可以在危机爆发后限制损害。声誉受损却会在法律程序结束很久之后依然存在。日内瓦卷所讲述的日内瓦历史表明，藏匿非法财富的名声会伴随一个金融中心多么长久。新加坡的优势在于，其声誉建立在相反的主张之上。这一优势也使它更加脆弱，因为一桩丑闻恰恰与金融中心所出售的核心主张相矛盾。

避免这一情景的条件

诚信危机是新加坡最能直接施加影响的情景。它取决于银行、信托公司、企业服务提供商、律师、会计师和家族办公室的日常行为。2023年的教训指向了关键的管控措施：以独立证据核实财富来源；审查复杂架构和持有多重国籍的人士；由有权拒绝业务的人员审查危险信号；以及机构与当局之间的合作。第H部分第III章介绍了法律框架，第H部分第V章则论述了执法和跨境合作。第四种情景补充了一个战略层面的观点：一次重大危机给整个金融中心造成的代价，超过所有企业严格合规成本的总和。

路标

诚信风险上升的指标包括：某个把关者受到宽松监管的板块快速增长；新财富集中来自某个有贪污或资本外逃记录的单一来源国；可疑交易报告增加而调查却未相应增加；外国执法行动点名新加坡实体；以及金融行动特别工作组后续跟进报告中出现批评性结论。

注释

1. Wikipedia, “1Malaysia Development Berhad scandal”（2026年11月访问）：美国司法部认定，刘特佐及其他同谋“diverted more than US$4.5 billion from 1MDB”；新加坡当局扣押了总计2.4亿新元的资产。 ↩
2. Monetary Authority of Singapore，媒体发布“Financial penalties imposed on Credit Suisse and UOB for 1MDB-related transactions”， 2017年5月30日

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（mas.gov.sg，2026年11月访问）：对八家银行（BSI Bank、Falcon Bank、星展银行、UBS AG、渣打银行、顾资银行、瑞士信贷和大华银行）处以"S$29.1 million in aggregate"的罚款。 ↩

3. Inter-Ministerial Committee on Anti-Money Laundering, *Report*, 2024年10月（mas.gov.sg，2026年11月访问），前言：新加坡警察部队执行了"one of the world's largest crackdowns on money laundering in August 2023"；"More than $3 billion in assets were seized or issued with prohibition of disposal orders, and ten persons have been arrested and convicted"；该委员会于2023年11月成立。 ↩

4. Wikipedia, "2023 Singapore money laundering case"（2026年11月访问），时间线："4 July 2025 – The Monetary Authority of Singapore (MAS) imposes S$27.45 million in penalties on nine financial institutions for breaches of AML requirements in relation to the case"，引用MAS, "MAS Takes Regulatory Actions against 9 Financial Institutions for Anti-Money Laundering Related Breaches"。 ↩

5. 财政部，"Singapore has a robust framework for combatting financial crime according to international body"，2026年5月6日（mof.gov.sg，2026年11月访问）：FATF于当日发布该报告；报告"places Singapore on Regular Follow-up, which is the process for FATF members that have done well"；有待改进的领域涉及扩散融资风险意识以及外国法人和法律安排的风险缓释。 ↩

6. Inter-Ministerial Committee on Anti-Money Laundering, *Report*, 2024年10月，委员会主席所作前言："Trust is the cornerstone of a sound financial centre and business hub. It provides individuals and businesses with the confidence to conduct their activities. At the same time, this trust can also be undermined by criminals seeking a safe haven for their illicit assets." ↩

7. 同上，前言："We continue to welcome legitimate investors and businesses, while remaining watchful and not falling prey to the allure of dirty money, to avoid tarnishing our hard-earned reputation as a trusted business hub." ↩

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