

# 宝石和贵金属 (反洗黑钱与反恐融资<sup>1</sup>) 法案说明会

反洗黑钱与反恐融资局 (ACD)  
律政部 (Ministry of Law)

2019年11月26日

<sup>1</sup>反洗黑钱与反恐融资：Anti-Money Laundering/Countering the Financing of Terrorism ("AML/CFT")  
注意：此中文翻译文本仅共参考。如中英文文本间出现任何不致，应以英文文本为准。

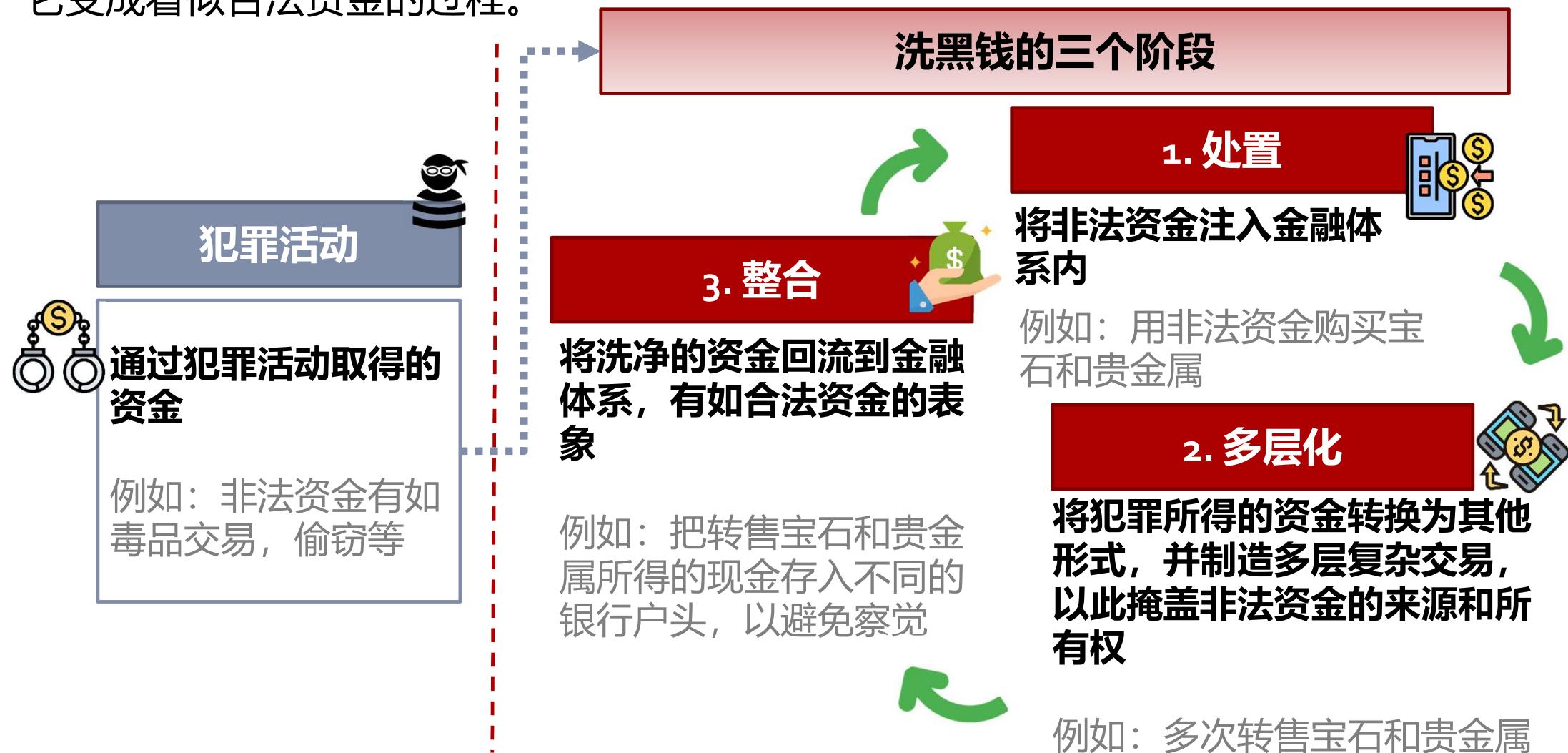
# 宝石和贵金属(反洗黑钱与反恐融资)法案

Precious Stones and Precious Metals  
(Prevention of Money Laundering and Terrorism Financing) Act  
("PSPM ACT")

**宝石和贵金属经销商行业**  
Precious Stones and Precious Metals Dealers ("PSMD") Sector

## 什么是洗黑钱 (Money laundering)?

洗黑钱 (Money Laundering “ML”) 是指犯罪者通过隐瞒和掩饰所得的非法资金来源，将它变成看似合法资金的过程。



## 名律师卷逃客户千万元

著名前律师大卫拉锡卷走客户约1133万元

2006年:

《在2006年5月31日至6月2日，为David Rasif & Partners 律师事务所独资律师时，挪用客户约1133万元后失踪，至今下落不明。》

.....目前被国际刑警通缉，被列在国际刑警的红色名单内。》

## 【技能创前程补助金诈领案】 五人团伙中首人被判刑 监5年8个月

2018年:

《与亲友一起串谋欺骗精深技能发展部 (SkillsFuture Singapore) 发放近4000万元技能创前程培训补助金。。。

庭上揭露，他曾经帮同伙藏匿670万元的现金赃款和11公斤的黄金，帮助他人洗钱。。。存放在家中的保险箱内。

控方称，洗钱可能助长其他严重的犯罪行为，要求法官判被告至少75个月监禁。》

## 什么是恐怖主义融资 (Terrorism financing)?

恐怖主义融资 (Terrorism Financing “TF”) 是指提供资金以支持恐怖主义。资金的来源可以是合法或非法所得。



### 购买宝石和贵金属

在新加坡购买宝石和贵金属 (Precious stones and precious metals “PSPM”)



### 转售宝石和贵金属

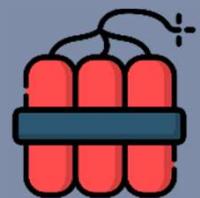
在新加坡或国外以更高价转售宝石和贵金属



### 筹集资金

以转售宝石和贵金属赚取利润

### 恐怖主义活动





## 内安法拘留6孟加拉籍客工被控资助恐怖活动

2016年：

.....内政部安全法令下被拘留的六名孟加拉客工被指**资助恐怖活动**.....**被控抵触恐怖主义(取缔资金)法令**。

六名被告面对一项到四项不等控状，他们被指**筹款和资助在孟加拉展开的恐怖袭击活动**，涉及的款项最少60元，最多1360元。

一旦罪成，他们可被判罚款高达50万元，或坐牢最长10年，或两者兼施。



## 涉资助恐怖主义活动 34岁新加坡男子被控

2019年：

.....涉嫌资助恐怖主义活动，一名34岁男子成为第二名被控抵触恐怖主义(取缔资金)法令的新加坡人。

.....商业事务局的调查发现，.....分别在2016年的7月29日及9月3日，向一名在海外**进行恐怖主义活动的人提供1059新元和62美元**.....根据**恐怖主义(取缔资金)法令**，**提供资金以支持恐怖主义，属于严重罪行，无论数额的多寡**。

使得洗黑钱与恐怖主义融资 (ML/TF) 风险潜伏在宝石和贵金属行业特点。

有价值

- 宝石和贵金属 (PSPM) 因价值稳定而用于洗净非法资金

便于携带

- 宝石和贵金属容易隐藏兼运输

容易转换成现金

- 难以查账追踪所有权而被利用于犯罪活动

这项法案的宗旨是为了加强管制和提升宝石和贵金属经销商 (Regulated dealer) 在防止洗黑钱，打击资助恐怖主义 (AML/CFT) 活动的应对措施。

## 新法案在2019年4月10日生效

### PSPM Act

#### 宝石和贵金属(反洗黑钱与反恐融资)法案 2019

Precious Stones and Precious Metals (Prevention of Money Laundering and Terrorism Financing) Act 2019

### PMLTF Regulations

#### 宝石和贵金属(反洗黑钱与反恐融资)条例 2019

Precious Stones and Precious Metals (Prevention of Money Laundering and Terrorism Financing) Regulations 2019

### Guidelines

#### 宝石和贵金属经销商指导准则 (指导准则)



 **指导准则**可从 <https://acd.mlaw.gov.sg/guidance-materials/> 下载

## 向受监管经销商注册局局长**注册**

### **实体相关规定**

(Entity-Based Requirements)

进行洗黑钱与恐怖主义融资风险评估  
(ML/TF risk assessment), 采取措施应对风险

制定内部政策, 程序和控制措施(IPPC), 包括:  
• **培训**雇员 (Training your employees)  
• **如有进行 S\$20,000 以上现金交易, 受监管经销商必须进行**独立审计****  
(Independent audit)

### **交易相关规定**

(Transaction-Based Requirements)

进行客户尽职调查 (CDD)

进行增强客户尽职调查 (ECDD)

提交现金交易报告 (CTR)

提交可疑交易报告 (STR)

纪录保管5年 (Record keeping)

 参考**指导准则**: "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"

# 交易相关规定

Transaction-Based Requirements



 **指导准则** (Guidelines) 可从 <https://acd.mlaw.gov.sg/guidance-materials/> 下载



## 现金交易报告

(Cash Transaction Report "CTR")

- 根据现金门槛提交报告，无须进行主观性评估
- 对任何指定交易 (designated transaction) 提交现金交易报告 (CTR)
- 如何提交？

**现金交易报告 (CTR) 可上网通过 SONAR 提交：** <https://www.police.gov.sg/sonar>

- 什么时候提交 CTR？  
**15个工作日内。**
- 我需要保留一份现金交易报告 (CTR) 吗？  
**需要。从交易日当天算起的五年内，您必须保存有关报告。**
- 如果我不提交现金交易报告 (CTR)，这是违法的吗？  
**是的。**

## 可疑交易报告

(Suspicious Transaction Report "STR")

- 在以下情况提交可疑交易报告 (STR)：
  - 无法执行或完成客户尽职调查 (CDD)
  - 疑似任何洗黑钱或/和与恐怖主义相关的活动
- 如何提交？

**可疑交易报告 (STR) 可上网通过 SONAR 提交：** <https://www.police.gov.sg/sonar>



SONAR website

- 什么时候提交 STR？  
**立即或尽快。**
- 我需要保留一份可疑交易报告 (STR) 吗？  
**需要。从交易日当天算起的五年内，您将需要保存有关报告。可疑交易报告 (STR) 必须保持机密，以保护举报人的身份。**
- 如果我不提交可疑交易报告，这是违法的吗？  
**是的。**



**参考指导准则： "Disclosure of Information"**

反洗  
黑钱

反恐  
融资

## 如何提交现金交易报告 (CTR) 和可疑交易报告 (STR)

1

设立 **SONAR** 账户

[https://www.police.gov.  
sg/sonar](https://www.police.gov.sg/sonar)



2

通过 **SONAR** 平台，在  
**15天内提交现金交易  
报告 (CTR Form NP  
784)** 和/或  
**立刻提交可疑交易报  
告 (STR)**



3

**保管现金交易报告/ 可  
疑交易报告 (CTR/STR),  
为期5年**



参考**指导准则**: "Disclosure of Information"

样本

## Example of Transaction-Based Requirements

### Step 1a: When to conduct CDD?

- i. For designated transactions that exceed S\$20,000 in cash or cash equivalent; or
- ii. Suspicion of money laundering; or
- iii. Doubts about previously obtained CDD information

### Step 1b: How to conduct CDD?

- i. Obtain, record and verify customer's particulars
- ii. Obtain, record and verify beneficial owner's particulars (if any)
- iii. Check customer against listings for terrorist designation and designated individuals and entities
- iv. Check if customer is a politically exposed person (PEP)

### Step 2a: When to conduct ECDD?

- i. The customer is defined as a PEP;
- ii. There is a match against the FATF list of high-risk countries; or
- iii. Customer fits the profile of a

### Step 2b: How to conduct ECDD?

- i. Establish customer's income level, source of wealth and funds
- ii. Obtain approval from senior management to proceed with the transaction
- iii. Perform enhanced on-going monitoring of the transaction

 参考指导准则: "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"

洗黑钱  
风险

恐怖主义  
融资风险

## 交易相关规定 (Transaction-Based Requirements)

1

对客户进行健全的**客户  
尽职调查** (CDD)

如果是指定交易  
(Designated transaction),  
必须提交**现金交易报告**  
(CTR)



2

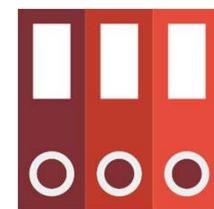
对于高风险客户, 必须进行  
**增强客户尽职调查** (ECDD)

如果发现**可疑现象**, 立刻  
**中止交易**并且马上**提交可疑  
交易报告** (STR)



3

**保管**现金交易报告/可  
疑交易报告  
(CTR/STR) 和任何  
**相关资料**, 为期**5年**



 参考**指导准则**: "*Customer Due Diligence*", "*Enhanced Customer Due Diligence*" 和 "*Record Keeping*"

## 什么时候进行客户尽职调查 (CDD)?



### 指定交易

(Designated transaction)  
超过 S\$20,000 现金  
或现金等价物



### 提交现金交 易报告 (CTR)



### 疑似洗黑钱或恐怖主义 融资 (ML/TF) 相关



### 提交可疑交 易报告 (STR)



对之前进行的  
**客户尽职调查 (CDD)**  
内容的真实性  
(Veracity) 或完整性  
(Adequacy) 存疑  
(例如针对现有客户)



参考**指导准则**: "Customer Due Diligence" 和 "Annex D – Red Flag Indicators for Regulated Dealers"

洗黑钱  
风险

恐怖主义  
融资风险

## 如何进行客户尽职调查 (CDD)，例如：

1

**获取、记录和核实**  
(Obtain, record and verify) 客户提供的识别个人资料



2

**筛查客户** (Screen customer) 是否与制裁名单的恐怖主义支持者、恐怖主义组织和恐怖分子匹配，而进行 ML/TF 风险评估

MHA website:  
[terrorists designations](#)



MAS website: Lists of  
[designated individuals and entities](#)



3

**如果与制裁名单筛查匹配** (Positive hits?)，**马上终止交易**，并且**通知警方**

如果客户名字不在制裁名单里，可以继续进行交易



参考**指导准则**: "*Customer Due Diligence*"



# 客户尽职调查 (CDD) 表格 A 样本 (Sample CDD Form A)

样本

## Annex E Sample CDD Form

### Customer Due Diligence (CDD)

#### FORM A – Customer's Particulars

Name of regulated dealer:	Date:
Name of employee:	Signature of employee:

#### A1. Customer's Particulars (For Individuals)

1.	Transaction number:	
2.	Date/Time of transaction:	
3.	Transaction value:	
4.	Description of PSPM:	
5.	Full name (including any alias):	
6.	Date of birth:	
7.	Residential address:	
8.	Contact No:	



参考指导准则: "Annex E – Sample CDD Form – Form A"

# 客户尽职调查 (CDD) 表格 B 样本 (Sample CDD Form B)

样本

## Customer Due Diligence (CDD)

### FORM B – Check customer's name against lists on:

- Terrorist designation
- Sanctions lists on designated individuals and entities
- FATF public list of high-risk and other monitored jurisdictions

\*Note: This form should not be shown to the customer.

Name of regulated dealer:

Date:

Name of employee:

Signature of employee:

#### B1. Check Against Lists on Terrorist Designation and Designated Individuals and Entities

1. Ministry of Home Affairs ("MHA")'s website on the Inter-Ministry Committee on Terrorist Designation ("IMC-TD") on terrorist designation (persons and entities designated as terroris

Any match?

Yes/  No

 参考指导准则: "Annex E – Sample CDD Form – Form B"

## 什么时候进行增强客户尽职调查 (ECDD)?



政治人物 (PEP),  
亲属或亲信



高风险国家或管辖区  
(现有例子：朝鲜, 伊朗。  
参考: [www.fatf-gafi.org/countries/#high-risk](http://www.fatf-gafi.org/countries/#high-risk))



具洗黑钱与恐怖主  
义融资高风险的人



参考指导准则: "Enhanced Customer Due Diligence"



洗黑钱  
风险

恐怖主义  
融资风险

## 如何进行增强客户尽职调查 (ECDD)，例如：

1

确定客户的财富来源  
(Source of Wealth) 与  
**资金来源** (Source of  
Fund)



2

在进行或继续交易之  
前，向高级管理人员  
取得批准。在必要时  
提交可疑交易报告  
(STR)



3

对有关交易进行**增强  
持续监测** (Enhanced  
ongoing monitoring)



参考**指导准则**：“Enhanced Customer Due Diligence”

## 红旗警讯指标 (Red flag indicators)

样本

### Annex D Red Flag Indicators for Regulated Dealers

The list is not exhaustive and may be updated due to changing circumstances and new methods of laundering money or financing terrorism. Regulated dealers are to refer to STRO's website for the latest list of red flags.

#### Red Flag Indicators: Customers

##### Transaction Patterns

- i) Transactions that are not consistent with the usual profile of a customer:
  - (a) Transactions that appear to be beyond the means of the customer based on his/her stated or known occupation or income; or
  - (b) Transactions that appear to be more than the usual amount for a typical customer of the business

 参考指导准则: "Annex D – Red Flag Indicators for Regulated Dealers"

## 增强客户尽职调查(ECDD)表格样本 (Sample ECDD Form)

样本

**Annex F Sample ECDD Form****Enhanced Customer Due Diligence (ECDD)**

\*Note: This form should not be shown to the customer.

Where ECDD is conducted, to attach completed (1) CDD Form A, (2) CDD Form B and (3) ECDD Form, together with copies of all supporting documents.

Name of regulated dealer:	Date:
Name of employee:	Signature of employee:

<b>A. Income Level, Source of Wealth and Source of Funds</b>			
1.	Establish the following (by reasonable means e.g. internet scanning and careful enquiries with the customer):  a. income level; b. source of wealth / source of funds;	<b>Income level:</b>	<b>Source of wealth:</b>
			<b>Source of funds:</b>



参考**指导准则**: "Annex F – Sample ECDD Form"

## 什么时候终止交易?



**在以下情况终止交易，  
并考虑提交可疑交易报  
告 (STR):**

你无法执行或完成任何客  
户尽职调查 (CDD)；或你有  
理由怀疑有关交易或客户  
可能同洗黑钱与恐怖主义  
融资 (ML/TF) 有关联。

**在以下情况终止交易，  
并向警方报案：**

你怀疑客户在指定恐怖分  
子、制裁名单上。



参考指导准则: "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"

# 实体相关规定

Entity-Based Requirements



 **指导准则**可从 <https://acd.mlaw.gov.sg/guidance-materials/> 下载



样本

## Annex A Example of AML/CFT Flowchart for Regulated Dealers

### Example of Entity-Based Requirements

#### Step 1: Do your risk assessment

- i. State the following:
  - Background of your customers
  - Countries that your customers are from
  - Products, services, transactions and delivery channels
- ii. Conduct a risk assessment of the above, e.g. low, medium or high risk
- iii. Come up with measure to address the risks

#### Step 2: Develop your internal policies, procedures and controls (IPPC)

- i. IPPCs should include the following:
  - Assessment of risks faced by your business
  - Appointment of compliance officer and his/her responsibilities
  - Checks to conduct when hiring employees

Procedure to conduct customer due diligence



参考指导准则: "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"

洗黑钱  
风险

恐怖主义  
融资风险

## 进行风险评估 (Conduct Risk Assessment), 例如:

1

### 客户风险



2

### 国家风险

查阅:

<https://www.fatf-gafi.org/countries/#high-risk>



3

### 产品、服务、交易 和运输管道风险



参考指导准则: "Risk Assessment" and "Annex B – Sample Risk Assessment Form"

## ML/TF 风险评估表格样本 (Sample risk assessment form)

样本

## Annex B Sample Risk Assessment Form

Name of regulated dealer:

Date of risk assessment:

## A. Background of customers in the previous year

Background	Number of transactions	% of total transactions <sup>20</sup>	Low risk	Medium risk	High risk	Measures to address risk <sup>21</sup>
E.g. Foreign	E.g. 10	E.g. 10/50 X 100 (total no. of transactions) = 20%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
E.g. Local	E.g. 40	E.g. 80%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Etc.	Etc.	Etc.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

 参考指导准则: "Annex B – Sample Risk Assessment Form"

洗黑钱  
风险

恐怖主义  
融资风险

## 制定内部政策，程序和控制措施 (Develop IPPC)

1

委任在管理层的  
**合规专员** (Compliance  
Officer)



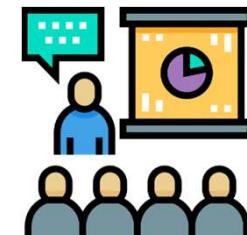
2

聘请雇员时，进行筛  
查确保高素质  
与具诚信



3

培训雇员理解和遵守  
内部政策，程序和控  
制措施 (IPPC)



参考**指导准则**：“Programmes and Measures to Prevent Money Laundering and Terrorism Financing”



# 内部政策、程序和控制措施 (IPPC) 文件样本 (Sample IPPC document)

## Annex C Sample IPPC Document

样本

Note: Regulated Dealers need to develop and document a set of IPPC which must cover the requirements stated in the Guidelines. Regulated dealers may refer to this sample to customise IPPCs that are appropriate for their business.

### Cover Page

Document title: Internal Policies, Procedures and Controls

Name of regulated dealer:

### Version Control Record

Version	Release Date	Key Changes	Author	Approved by Senior Management
6	2019	Releas	XX	

参考指导准则: "Annex C – Sample IPPC Document"





休息时间

# 其他监管条例

(OTHER REGULATORY REQUIREMENTS)



 **指导准则**可从 <https://acd.mlaw.gov.sg/guidance-materials/> 下载



洗黑钱  
风险

恐怖主义  
融资风险

## 其他控制措施:

1

**持续监测** (Ongoing monitoring) 审查交易



2

**记录保管5年**



3

评估客户是否恐怖分子或联合国法案里指定的人物

**订阅新加坡金融管理局网站以获取最新的情报**

**Regulation Focus Areas**

Anti-Money Laundering

Enforcement

参考**指导准则**: "Ongoing monitoring of Transactions", "Record Keeping" 和 "Additional Measures Relating to Targeted Financial Sanctions"



**若要修改业务地点，务必通知受监管经销商注册局局长  
(Registrar of Regulated Dealers)**

- 在监管范围以外进行宝石和贵金属受监管活动
- 结束宝石和贵金属受监管活动

**若要修改细节和情势，务必通知受监管经销商注册局局长 (Registrar of Regulated Dealers)**

- 修改业务名字或注册地址
- 修改地址
- 修改电话号码、电子邮件、传真号码
- 修改关键人员
- 申请破产
- 终止营业
- 刑事诉讼调查当中

查阅宝石和贵金属(反洗黑钱与反恐融资)条例 2019 (PMLTF Regulations) : *Regulations 20 and 21*



## 收集客户资料

- 作为客户尽职调查程序的一部分，受监管经销商必须通过独立与可信来源，**获取、记录及核实**(Obtain, record and verify)确认客户身份的资料。
- 这可通过核实客户的**身份证件、护照或其他政府签发的身份证件**，上头应有客户的照片。



## 法律规定机构可收集身份证号码

- 个人资料保护委员会 (Personal Data Protection Commission ("PDPC")) 在其网站列出了**宝石和贵金属(反洗黑钱与反恐融资)法案 (PSPM Act)**，规定受监管经销商可在该法案下，收集个人身份证件或其他国家的身份证件号码。

PAYROLL TAX ACT +

PRECIOUS STONES AND PRECIOUS METALS (PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING) ACT +

PRIVATE EDUCATION ACT +

查阅个人资料保护委员会网站: <https://www.pdpc.gov.sg/NRIC-Extracts>



**没有遵守或违反宝石和贵金属 (反洗黑钱与反恐融资) 法案 (PSPM Act) 的受监管经销商 (regulated dealer), 将被定罪并可能面对:**

例如:

**第18(5)条 - 纪录保管 (Keeping of records)**

- 罚款不超过10万元

**第27条 - 对司法人员或获授权官员提供假信息 (Providing false information to Registrar or authorised officer)**

- 罚款不超过5万元或监禁不超过两年, 或两者兼施。



查阅**宝石和贵金属反洗黑钱与反恐融资法案 (PSPM Act)**



## 我应该阅读:



- 受监管经销商的指导准则  
**(指导准则)**  
了解如何遵守监管条例

## 这包括:

- 受监管经销商的反洗黑钱/  
反恐融资流程图样本
- ML/TF 风险评估表格样本
- 内部政策、程序和控制措施  
(IPPC) 文件样本
- 客户尽职调查 (CDD) 表格样  
本
- 增强客户尽职调查 (ECDD)  
表格样本
- 红旗警讯指标 (Red flag  
indicators)



## 我也应该参考:



- Inter-Ministry Committee-Terrorist Designation  
("IMC-TD")

了解指定恐怖分子和打击资助恐怖主义的法律

([https://www.mha.gov.sg/inter-ministry-committee-terrorist-designation-\(imc-td\)](https://www.mha.gov.sg/inter-ministry-committee-terrorist-designation-(imc-td)))



- 有关针对性金融制裁的信息及制裁名单

了解联合国条例下的针对性金融制裁及制裁名单

(<https://www.mas.gov.sg/regulation/anti-money-laundering/targeted-financial-sanctions/lists-of-designated-individuals-and-entities>)



## 有利于阅读:



- 金融行动特别工作组 (FATF)

FATF Recommendations and sector specific risk typologies

(<http://www.fatf-gafi.org/publications/fatfrecommendations/documents/fatf-recommendations.html>)



- 宝石和贵金属相关 FATF 报告

- 与黄金相关的 ML/TF 风险 (ML/TF risks associated with gold) (<http://www.fatf-gafi.org/media/fatf/documents/reports/ML-TF-risks-vulnerabilities-associated-with-gold.pdf>)



- 与砖石交易相关的 ML/TF (ML/TF through trade in diamonds) (<http://www.fatf-gafi.org/media/fatf/documents/reports/ML-TF-through-trade-in-diamonds.pdf>)



- 新加坡洗黑钱与恐怖主义融资风险评估

Singapore National Risk Assessment Report

(<https://www.mas.gov.sg/publications/monographs-or-information-paper/2014/national-risk-assessment>)





## 若有疑问，可以联系以下：

### CorpPass

有关企业密码询问

电话: 6643 0577

星期一至五: 8am – 8pm

星期六: 8am – 2pm

电邮: [support@corppass.gov.sg](mailto:support@corppass.gov.sg)

网站: <https://www.corppass.gov.sg>

### GoBusiness Licensing

有关GoBusiness Licensing询问  
(之前为LicenceOne)

电话: 6774 1430

星期一至五: 8am – 8pm

星期六: 8am – 2pm

电邮: [licences-helpdesk@crimsonlogic.com.sg](mailto:licences-helpdesk@crimsonlogic.com.sg)

网站:

<https://www.gobusiness.gov.sg/licences>

### Suspicious Transaction Reporting Office ("STRO")

有关SONAR询问

有关现金交易报告或可疑交易报告疑问:

电邮: [STRO@spf.gov.sg](mailto:STRO@spf.gov.sg)

有关SONAR账户或技术问题:

电邮: [SPF\\_STRO\\_IT\\_Team@spf.gov.sg](mailto:SPF_STRO_IT_Team@spf.gov.sg)

### Personal Data Protection Commission ("PDPC")

有关个人资料询问

电话: 6377 3131

星期一至四–Thu: 8.30am – 6.00pm

星期五: 8.30am – 5.30pm

网上反馈表格:

<https://apps.pdpc.gov.sg/feedback/feed-back-form>

### Ministry of Law Services Centre

有关PSPM Act询问

柜台营业时间:

星期一至五: 8.30am – 5.00pm  
(周末和假日休息)

询问热线营业时间:

电话: 1800-CALL-LAW  
(1800 2255 529)

星期一至五: 8.30am – 5.00pm  
(周末和假日休息)

网上询问表格:

<https://eservices.mlaw.gov.sg/enquiry/>

**1 订阅 MAS 网站**

- 在此订阅 MAS 网站以便获得制裁名单更新信息: <https://www.mas.gov.sg/subscription-services>

**2 设立您的 SONAR 用户帐户**

- 在此处设立您的 SONAR 用户帐户: <https://www.police.gov.sg/sonar>

**3 进行 ML/TF 风险评估  
并制定 IPPC**

- 记录 ML/TF 风险评估 (Risk assessment) 并制定 IPPC
- 参加专为您的合规专员设计的法案讲习班

**4 定期浏览 ACD 网站 和  
检查电邮**

- 有关指导准则和活动的最新信息, 请浏览 ACD 网站: <https://acd.mlaw.gov.sg>
- 有关通知将通过电子邮件发送给您



## 订阅 MAS 网站

1

- 在此订阅 MAS 网站以便获得制裁名单更新信息: <https://www.mas.gov.sg/subscription-services>

### 第一步

根据注册证书  
的组织名称输入组织名称

#### Subscriber Services

Get notified whenever news and updates are posted on this website.

\* refer to mandatory field.

\*First Name

Last Name

\*Email

\*Organisation



### 第二步

#### Regulation Focus Areas

Anti-Money Laundering

### 第三步

#### Security

I'm not a robot



**SUBMIT**

## 设立您的 SONAR 用户 帐户

2

- 在此处注册您的 SONAR 用户帐户:  
<https://www.police.gov.sg/sonar>



### 第一步

#### WHAT YOU NEED

[Information](#) on registration for SONAR Account, instruction guides and forms.

### 第二步

#### TO PROCEED

[Login via CorpPass](#)

(For Businesses and employees of businesses submitting reports to STRO)

### 第三步

Log in with CorpPass

UEN/ENTITY ID

CORPPASS ID

Password

Remember Entity ID

[Forgot Entity / CorpPass ID or Password](#)

[Cancel](#) [Login](#)

3

### 进行 ML/TF 风险评估 并制定 IPPC

- 记录 ML/TF 风险评估 (Risk assessment) 并制定 IPPC
- 参加专为您的合规专员设计的法案讲习班

#### 第一步

- 合规专员可以参考**指导准则**的Annex B
- 对您的业务**进行洗黑钱与恐怖主义融资 (ML/TF) 风险评估并记录存档**

##### Annex B Sample Risk Assessment Form

Name of regulated dealer:

##### A. Background of customers in the pre

Background	Number of transactions	% of total transactions <sup>20</sup>
Foreign	ca. 10	ca.

#### 第二步

- 合规专员可以参考**指导准则**的Annex C
- 制定并记录 IPPC
- 培训雇员对 IPPC 的认识

##### Annex C Sample IPPC Document

Note: Regulated Dealers need to develop a requirements stated in the Guidelines. Regulated that are appropriate for their business.

##### Cover Page

Document title: Internal Policies, Procedures and

#### 第三步

- 合规专员可以参加**法案讲习班**
- 留意有关通知将通过电子邮件发送给您





## 定期浏览 ACD 网站 和 检查电邮

- 有关**指导准则**和活动的最新信息，请浏览ACD 网站 :<https://acd.mlaw.gov.sg>
- 有关通知将通过电子邮件发送给您



### 第一步

The screenshot shows the Ministry of Law Singapore website. The top navigation bar includes 'REGULATORY REGIME' and 'ABOUT MINLAW'. Below the navigation, there is a sidebar with links: 'Registration of Regulated Dealers', 'List of Registered Dealers', 'Regulatory Compliance', 'Guidance Materials' (which is highlighted with a red dashed box), and 'Key Resources'. At the bottom of the sidebar, it says 'Anti-Money Laundering / Countering'. The background of the page features a large image of gold bars.

### 第二步

[2. Guidelines for Regulated Dealers in the Precious Stones and Precious Metals Dealers Sector on Anti-Money Laundering/Countering the Financing of Terrorism \("Guidelines"\)](#)

The [Guidelines](#) are meant to help regulated dealers understand the regulatory requirements under the Precious Stones and Precious Metals (Prevention of Money

### 第三步

The sample forms and checklists in the Annexes of the Guidelines are also available in [MS Word format](#) for ease of editing.

# 问答解答



## 问题一:

在哪里可以找到有关宝石和贵金属(反洗黑钱与反恐融资)法案的资料?

## 解答:

有关法案的资料, 您可以上网浏览 ACD 网站 <https://acd.mlaw.gov.sg/>。**指导准则** (Guidelines for Regulated Dealers) 可从 <https://acd.mlaw.gov.sg/guidance-materials/> 下载。

## 问题二:

我要更换个人和公司资料, 要如何通知律政部的ACD?

## 解答:

您在更换资料的14天前, 需要发电邮至 [ACD\\_Submissions@mlaw.gov.sg](mailto:ACD_Submissions@mlaw.gov.sg) 通知ACD。详细步骤请查阅下一页。  
通知14天后才能到 GoBusiness Licencing Portal 更换资料详情。GoBusiness Licencing Portal (2019年10月31日生效) 网址是 (<https://www.gobusiness.gov.sg/licences>)。



S/N	Type of Amendment 更换资料	Process 程序	Fees Payable? 需付费用吗?
1	<p><b>Duty to notify Registrar of change in particulars</b>  <b>(which involves updating information with ACRA)</b></p> <ul style="list-style-type: none"> <li>i. Change of organization details</li> <li>ii. Change of organization registered address</li> <li>iii. Add/Edit Directors/ Managing Directors/ Partners/ Company Secretary/ Owner/ Manager identification particulars</li> <li>iv. Add/Edit substantial shareholder identification particulars</li> </ul>	<p><b>Step 1:</b>  Notify Registrar via email  (<a href="mailto:ACD_Submissions@mlaw.gov.sg">ACD_Submissions@mlaw.gov.sg</a>)  at least <b>14 days before</b> starting to carry out any regulated activity at the new outlet (addition of new outlet) or before ceasing to carry out any regulated activity at the existing outlet (closing of outlet).</p> <p><b>Step 2:</b>  After notifying the Registrar, submit an amendment in <b>GoBusiness Licensing Portal</b> to update your declarations.</p>	No.

S/N	Type of Amendment 更换资料	Process 程序	Fees Payable? 需付费用吗?
2	<p><b>Duty to notify Registrar of change in particulars</b>  <b>(which does not involve updating information with ACRA)</b></p> <ul style="list-style-type: none"> <li>i. Change of applicant details</li> <li>ii. Change of applicant address</li> <li>iii. Change of organization operating address (primary outlet/headquarter)</li> <li>iv. Change of organization contact details</li> <li>v. Change of mailing address</li> <li>vi. Change of compliance officer details</li> <li>vii. Add/Edit outlet manager details</li> <li>viii. Change of approved PSMD licence(s), or equivalent, obtained overseas</li> </ul>	<p><b>Step 1:</b>  Notify Registrar via email (<a href="mailto:ACD_Submissions@mlaw.gov.sg">ACD_Submissions@mlaw.gov.sg</a>) at least 14 days before making the change in GoBusiness Licensing Portal.</p> <p><b>Step 2:</b>  After notifying the Registrar, submit an amendment in <b>GoBusiness Licensing Portal</b>.</p>	No.

S/N	Type of Amendment 更换资料	Process 程序	Fees Payable? 需付费用吗?
3	<p><b>Duty to notify Registrar of change in circumstances</b> <b>(which does not involve updating information with ACRA)</b></p> <p>i. Change of other information <i>(Includes declarations relating to banking and credit card facilities, criminal investigations, bankruptcy)</i></p>	<p><b>Step 1:</b> Notify Registrar via email (<a href="mailto:ACD_Submissions@mlaw.gov.sg">ACD_Submissions@mlaw.gov.sg</a>) within 14 days after the matter occurs.</p> <p><b>Step 2:</b> After notifying the Registrar, submit an amendment in <b>GoBusiness Licensing Portal</b> to update your declarations.</p>	No.

S/N	Type of Amendment 更换资料	Process 程序	Fees Payable? 需付费用吗?
4	<p><b>Duty to notify Registrar of change in place of business (which does not involve updating information with ACRA)</b></p> <p>i. Change in place of business (<i>Relocation of existing outlet/ Addition of new outlet(s)/ Closing of outlet(s)</i>)</p>	<p><b>Step 1:</b> Notify Registrar via email (<a href="mailto:ACD_Submissions@mlaw.gov.sg">ACD_Submissions@mlaw.gov.sg</a>) at least <b>14 days before</b> starting to carry out any regulated activity at the new outlet (addition of new outlet) or before ceasing to carry out any regulated activity at the existing outlet (closing of outlet).</p> <p><b>Step 2:</b> After notifying the Registrar, submit an amendment in <b>GoBusiness Licensing Portal</b> to update your declarations.</p>	<p>Registration fees for additional outlet(s) will be charged on a prorated basis based on the formulae <math>(CxD)/365 \times E</math>.</p> <p><b>Note:</b> <i>C</i> is \$300. <i>D</i> is the period (in days) of the remainder of the period of the registered dealer's registration. <i>E</i> is the number of additional outlet to add.</p> <p>For reduction in number of outlets, there is no refund of registration fees.</p>

**问题三:**

如何提交现金交易报告  
(CTR) 和/或可疑交易报  
告 (STR)?

**解答:**

您需要通过 <https://www.police.gov.sg/sonar> 设立一个 SONAR 账户，然后上网提交现金交易报告 (CTR) 和/或可疑交易报告 (STR)。现金交易报告 (CTR) 需要在完成交易后的15天内提交。可疑交易报告 (STR) 得立刻提交。

**问题四:**

我可以使用自己的客户  
尽职调查 (CDD) 表格吗?

**解答:**

ACD 网站提供客户尽职调查 (CDD) 表格样本共您作参考。您也可以定制自己的客户尽职调查 (CDD) 表格。



**错误观念一**

“打击洗黑钱与恐怖主义融资是政府的职责。”

**声明**

拥有扎实的反洗黑钱与反恐融资架构对新加坡有益。受监管经销商是防止洗黑钱与恐怖主义融资的第一道防线。

**错误观念二**

“我必须要对所有客户进行客户尽职调查 (CDD)。”

**声明**

您得在以下情形进行客户尽职调查：

- 1) 超过 S\$20,000 现金或现金等价物的交易。
- 2) 疑似洗黑钱或恐怖主义融资 (ML/TF) 相关。
- 3) 对之前进行的客户尽职调查内容的真实性或完整性存疑。

**错误观念三**

“我必须使用市场所提供的客户筛查服务。”

**声明**

您可以利用内政部 (MHA) 和新加坡金融管理局 (MAS) 的制裁名单来进行客户筛查。

# 反馈表格

请上网填写反馈表格提供您对今天说明会的意见:

<https://go.gov.sg/formfeedback>

或扫描 QR 码:



如果有任何疑问，您可以上网到律政部网页填写询问表格:

<https://eservices.mlaw.gov.sg/enquiry/>

