

MAS Notice 626A

24 April 2015

Last revised on 1 March 2022

(Refer to endnotes for history of amendments)

NOTICE TO CREDIT CARD OR CHARGE CARD LICENSEES
MONETARY AUTHORITY OF SINGAPORE ACT 1970

**PREVENTION OF MONEY LAUNDERING AND COUNTERING THE FINANCING OF
TERRORISM – CREDIT CARD OR CHARGE CARD LICENSEES**

1 INTRODUCTION

- 1.1 This Notice is issued pursuant to section 27B of the Monetary Authority of Singapore Act 1970 (“MAS Act”) and applies to all credit card or charge card licensees in Singapore (“licensees”) licensed under section 57B of the Banking Act 1970 (“BA”).

[MAS Notice 626A (Amendment) 2022]

- 1.2 This Notice shall take effect from 24 July 2015.

2 DEFINITIONS

- 2.1 For the purposes of this Notice —

“account issuance service” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“AML/CFT” means anti-money laundering and countering the financing of terrorism;

“Authority” means the Monetary Authority of Singapore;

“bearer negotiable instrument” means –

- (a) a traveller’s cheque; or
- (b) any negotiable instrument that is in bearer form, indorsed without any restriction, made out to a fictitious payee or otherwise in such form that title thereto passes upon delivery,

and includes a negotiable instrument that has been signed but with the payee's name omitted;

[MAS Notice 626A (Amendment) 2022]

“beneficial owner”, in relation to a customer of a licensee, means the natural person who ultimately owns or controls the customer or the natural person on whose behalf a transaction is conducted or business relations are established, and includes any person who exercises ultimate effective control over a legal person or legal arrangement;

“beneficiary institution” means —

- (a) in relation to a wire transfer, the financial institution that receives the wire transfer from the ordering institution, directly or through an intermediary institution, and makes the funds available to the wire transfer beneficiary; or
- (b) in relation to a value transfer, the financial institution that receives the value transfer from the ordering institution, directly or through an intermediary institution, and makes one or more digital payment tokens available to the value transfer beneficiary;

[MAS Notice 626A (Amendment) 2022]

“business relations” means the opening or maintenance of an account by the licensee in the name of a person (whether a natural person, legal person or legal arrangement);

“cash” means currency notes and coins (whether of Singapore or of a foreign country or jurisdiction) which are legal tender and circulate as money in the country or jurisdiction of issue;

[MAS Notice 626A (Amendment) 2022]

“CDD measures” or “customer due diligence measures” means the measures required by paragraph 6;

“CDSA” means the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992;

[MAS Notice 626A (Amendment) 2022]

“connected party” —

- (a) in relation to a legal person (other than a partnership), means any director or

any natural person having executive authority in the legal person;

- (b) in relation to a legal person that is a partnership, means any partner or manager¹; and
- (c) in relation to a legal arrangement, means any natural person having executive authority in the legal arrangement;

“cross-border money transfer service” has the same meaning as defined in Part 3 of the First Schedule of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“cross-border wire transfer” means a wire transfer where the ordering institution and the beneficiary institution are located in different countries or jurisdictions and also refers to any chain of wire transfer in which at least one of the financial institutions involved is located in a different country or jurisdiction;

[MAS Notice 626A (Amendment) 2022]

“custodian wallet service” means the service of safekeeping and administration of digital payment tokens or instruments enabling control over digital payment tokens;

[MAS Notice 626A (Amendment) 2022]

“customer”, in relation to a licensee, means a person (whether a natural person, legal person or legal arrangement) with whom the licensee establishes or intends to establish business relations;

“digital payment token” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“digital payment token service” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“digital payment token transfer service” means the service of accepting digital payment token from one digital payment token address or account, whether in Singapore or outside Singapore, as principal or agent, for the purposes of transferring, or arranging for the transfer of, the digital payment token to another digital payment token address or account, whether in Singapore or outside Singapore;

¹ In the case of a limited liability partnership or a limited partnership.

[MAS Notice 626A (Amendment) 2022]

“domestic money transfer service” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“domestic wire transfer” means a wire transfer where the ordering institution and beneficiary institution are located in the same country or jurisdiction and also refers to any chain of wire transfer that takes place entirely within a country or jurisdiction, even though the system used to transfer the payment message may be located in another country or jurisdiction;

[MAS Notice 626A (Amendment) 2022]

“FATF” means the Financial Action Task Force;

“FX counterparty”, in relation to an FX transaction entered into by the licensee, means the person on whose behalf the FX transaction is conducted;

[MAS Notice 626A (Amendment) 2022]

“FX transaction” means a transaction (not being a money-changing transaction) for the purchase or sale of foreign currency without the use of foreign currency notes;

[MAS Notice 626A (Amendment) 2022]

“government entity” means a government of a country or jurisdiction, a ministry within such a government, or an agency specially established by such a government through written law;

“legal arrangement” means a trust or other similar arrangement;

“legal person” means an entity other than a natural person that can establish a permanent customer relationship with a financial institution or otherwise own property;

“licensee” means a person who is licensed to carry on the business of issuing credit cards or charge cards in Singapore under section 57B of the BA;

“money-changing service” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“officer” means any director or any member of the committee of management of the licensee;

“ordering institution” means –

- (a) in relation to a wire transfer, the financial institution that initiates the wire transfer and transfers the funds upon receiving the request for a wire transfer on behalf of the wire transfer originator; or
- (b) in relation to a value transfer, the financial institution that initiates the value transfer and transfers one or more digital payment tokens upon receiving the request for a value transfer on behalf of the value transfer originator;

[MAS Notice 626A (Amendment) 2022]

“partnership” means a partnership, a limited partnership within the meaning of the Limited Partnerships Act 2008 or a limited liability partnership within the meaning of the Limited Liability Partnerships Act 2005;

[MAS Notice 626A (Amendment) 2022]

“payment account” has the same meaning as defined in section 2(1) of the PS Act;

[MAS Notice 626A (Amendment) 2022]

“payment service transaction” means any transaction accepted, processed, or executed by the licensee in the course of carrying on its business of providing a specified payment service;

[MAS Notice 626A (Amendment) 2022]

“personal data” has the same meaning as defined in section 2(1) of the Personal Data Protection Act 2012;

[MAS Notice 626A (Amendment) 2022]

“PS Act” means the Payment Services Act 2019;

[MAS Notice 626A (Amendment) 2022]

“reasonable measures” means appropriate measures which are commensurate with the level of money laundering or terrorism financing risks;

[MAS Notice 626A (Amendment) 2022]

“recipient” —

(a) in respect of a payment transaction that relates to a money-changing service, means a person (whether a natural person, legal person, or legal arrangement) for whom the licensee undertakes a transaction;

(b) in respect of –

(i) a payment transaction received from another country or jurisdiction to Singapore in the course of carrying on a business of providing a cross-border money transfer service;

(ii) a payment transaction received in the course of carrying on a business of providing a domestic money transfer service;

(iii) a withdrawal of any cash from a payment account in the course of carrying on a business of providing an account issuance service; or

(iv) a payment service transaction,

means a person (whether a natural person, legal person or legal arrangement) to whom the licensee pays out any funds in cash or cash equivalent in Singapore and the person on behalf of whom such funds are received; or

(c) means an FX counterparty;

[MAS Notice 626A (Amendment) 2022]

“SFA” means the Securities and Futures Act 2001;

[MAS Notice 626A (Amendment) 2022]

“specified payment service” means any of the following service:

(a) a digital payment token service;

(b) a digital payment token transfer service;

(c) a custodian wallet service;

[MAS Notice 626A (Amendment) 2022]

“STR” means suspicious transaction report;

“STRO” means the Suspicious Transaction Reporting Office, Commercial Affairs Department of the Singapore Police Force;

“TSOFA” means the Terrorism (Suppression of Financing) Act 2002;

[MAS Notice 626A (Amendment) 2022]

“value transfer” refers to any transaction carried out on behalf of a value transfer originator through a financial institution with a view to making one or more digital payment tokens available to a beneficiary person at a beneficiary institution, irrespective of whether the originator and the beneficiary are the same person; and

[MAS Notice 626A (Amendment) 2022]

“wire transfer” refers to any transaction carried out on behalf of a wire transfer originator through a financial institution by electronic means with a view to making an amount of funds available to a beneficiary person at a beneficiary institution, irrespective of whether the originator and the beneficiary are the same person.

[MAS Notice 626A (Amendment) 2022]

- 2.2 A reference to any threshold or value limit expressed in S\$ shall include a reference to the equivalent amount expressed in any other currency and in any digital payment token. The equivalent amount in digital payment tokens shall be determined based on the conversion rates prevailing at the time of the licensee’s compliance with the relevant threshold or value limit, either as published by the licensee in the course of its business or offered by the licensee to its customer in relation to the payment service transaction.

[MAS Notice 626A (Amendment) 2022]

- 2.3 The expressions used in this Notice shall, except where defined in this Notice or where the context otherwise requires, have the same meanings as in the BA.

3 UNDERLYING PRINCIPLES

- 3.1 This Notice is based on the following principles, which shall serve as a guide for all licensees in the conduct of their operations and business activities:

(a) A licensee shall exercise due diligence when dealing with customers, natural persons appointed to act on the customer’s behalf, connected parties of the customer and beneficial owners of the customer.

(b) A licensee shall conduct its business in conformity with high ethical standards, and guard against establishing any business relations or undertaking any transaction, including a payment service transaction, that is or may be connected with, or facilitates or may facilitate money laundering or terrorism financing.

- (c) A licensee shall, to the fullest extent possible, assist and cooperate with the relevant law enforcement authorities in Singapore to prevent money laundering and terrorism financing.

[MAS Notice 626A (Amendment) 2022]

- 3.2 For avoidance of doubt, a licensee shall not undertake any transaction for any person (whether a natural person, legal person or legal arrangement) without establishing business relations with that person.

[MAS Notice 626A (Amendment) 2015]

4 ASSESSING RISKS AND APPLYING A RISK-BASED APPROACH

Risk Assessment

- 4.1 A licensee shall take appropriate steps to identify, assess and understand, its money laundering and terrorism financing risks in relation to —

- (a) its customers;
- (b) the countries or jurisdictions its customers are from or in;
- (c) the countries or jurisdictions the licensee has operations in; and
- (d) the products, services, transactions, including payment service transactions, and delivery channels of the licensee.

[MAS Notice 626A (Amendment) 2022]

- 4.2 The appropriate steps referred to in paragraph 4.1 shall include —

- (a) documenting the licensee's risk assessments;
- (b) considering all the relevant risk factors before determining the level of overall risk and the appropriate type and extent of mitigation to be applied;
- (c) keeping the licensee's risk assessments up-to-date; and
- (d) having appropriate mechanisms to provide its risk assessment information to the Authority.

Risk Mitigation

4.3 A licensee shall —

- (a) develop and implement policies, procedures and controls, which are approved by senior management, to enable the licensee to effectively manage and mitigate the risks that have been identified by the licensee or notified to it by the Authority or other relevant authorities in Singapore;
- (b) monitor the implementation of those policies, procedures and controls, and enhance them if necessary;
- (c) perform enhanced measures where higher risks are identified, to effectively manage and mitigate those higher risks; and
- (d) ensure that the performance of measures or enhanced measures to effectively manage and mitigate the identified risks addresses the risk assessment and guidance from the Authority or other relevant authorities in Singapore.

[MAS Notice 626A (Amendment) 2022]

5 NEW PRODUCTS, PRACTICES AND TECHNOLOGIES

5.1 A licensee shall identify and assess the money laundering and terrorism financing risks that may arise in relation to —

- (a) the development of new products and new business practices, including new delivery mechanisms; and
- (b) the use of new or developing technologies for both new and existing products.

[MAS Notice 626A (Amendment) 2022]

5.2 A licensee shall undertake the risk assessments, prior to the launch or use of such products, practices and technologies (to the extent such use is permitted by this Notice), and shall take appropriate measures to manage and mitigate the risks.

5.3 A licensee shall, in complying with the requirements of paragraphs 5.1 and 5.2, pay special attention to any —

- (a) new products and new business practices, including new delivery mechanisms; and
- (b) new or developing technologies,

that favour anonymity.

6 CUSTOMER DUE DILIGENCE (“CDD”)

Anonymous or Fictitious Account

6.1 No licensee shall open or maintain an anonymous account or an account in a fictitious name.

Where There Are Reasonable Grounds for Suspicion prior to the Establishment of Business Relations

6.2 Prior to a licensee establishing business relations, where the licensee has any reasonable grounds to suspect that the assets or funds of a customer are proceeds of drug dealing or criminal conduct as defined in the CDSA, or are property related to the facilitation or carrying out of any terrorism financing offence as defined in the TSOFA, the licensee shall —

- (a) not establish business relations with, or undertake a transaction for, the customer; and
- (b) file an STR², and extend a copy to the Authority for information.

[MAS Notice 626A (Amendment) 2022]

When CDD is to be Performed

6.3 A licensee shall perform the measures as required by paragraphs 6, 7 and 8 when —

- (a) the licensee establishes business relations with any customer;
- (b) the licensee undertakes any transaction of a value exceeding S\$5,000, other than any payment service transaction referred to in paragraph 6.3(e), for any customer who has not otherwise established business relations with the licensee;
- (c) the licensee effects or receives any funds by domestic wire transfer, or by cross-border wire transfer, for any customer who has not otherwise established business relations with the licensee;
- (d) the licensee undertakes any transaction for the purposes of carrying on its business of providing cross-border money transfer service, for any customer who has not otherwise established business relations with the licensee;

² Please note in particular section 48 of the CDSA on tipping-off.

- (e) the licensee undertakes any payment service transaction for any customer who has not otherwise established business relations with the licensee;
- (f) the licensee effects or receives any digital payment tokens by value transfer, for any customer who has not otherwise established business relations with the licensee;
- (g) there is a suspicion of money laundering or terrorism financing, notwithstanding that the licensee would not otherwise be required by this Notice to perform the measures as required by paragraphs 6, 7 and 8 of this Notice; or
- (h) the licensee has doubts about the veracity or adequacy of any information previously obtained.

[MAS Notice 626A (Amendment) 2022]

6.3A Where a licensee suspects that two or more transactions are or may be related, linked or the result of a deliberate restructuring of an otherwise single transaction into smaller transactions in order to evade the measures provided for in this Notice in relation to the circumstances set out in paragraphs 6.3(b), the licensee shall treat the transactions as a single transaction and aggregate their values for the purposes of this Notice.

[MAS Notice 626A (Amendment) 2022]

(l) Identification of Customer

6.4 A licensee shall identify each customer.

6.5 For the purposes of paragraph 6.4, a licensee shall obtain at least the following information:

- (a) full name, including any aliases;
- (b) unique identification number (such as an identity card number, birth certificate number or passport number, or where the customer is not a natural person, the incorporation number or business registration number);
- (c) the customer's –
 - (i) residential address; or
 - (ii) registered or business address, and if different, principal place of business,

as may be appropriate;

- (d) date of birth, establishment, incorporation or registration (as may be appropriate); and
- (e) nationality, place of incorporation or place of registration (as may be appropriate).

6.6 Where the customer is a legal person or legal arrangement, the licensee shall, apart from identifying the customer, also identify the legal form, constitution and powers that regulate and bind the legal person or legal arrangement.

6.7 Where the customer is a legal person or legal arrangement, the licensee shall identify the connected parties of the customer, by obtaining at least the following information of each connected party:

- (a) full name, including any aliases; and
- (b) unique identification number (such as an identity card number, birth certificate number or passport number of the connected party).

6.7A Where the licensee –

- (a) has assessed that the money laundering and terrorism financing risks in relation to the customer are not high; and
- (b) is unable to obtain the unique identification number of the connected party after taking reasonable measures,

the licensee may obtain the date of birth and nationality of the connected party, in lieu of the unique identification number.

[MAS Notice 626A (Amendment) 2022]

6.7B The licensee shall document the results of the assessment in paragraph 6.7A(a) and all the measures taken under paragraph 6.7A(b).

[MAS Notice 626A (Amendment) 2022]

(II) Verification of Identity of Customer

6.8 A licensee shall verify the identity of the customer using reliable, independent source data, documents or information. Where the customer is a legal person or legal arrangement, a licensee shall verify the legal form, proof of existence, constitution and powers that regulate and bind the customer, using reliable, independent source data, documents or information.

(III) Identification and Verification of Identity of Natural Person Appointed to Act on a Customer's Behalf

6.9 Where a customer appoints one or more natural persons to act on the customer's behalf in establishing business relations with a licensee or the customer is not a natural person, the licensee shall —

- (a) identify each natural persons who acts or is appointed to act on behalf of the customer by obtaining at least the following information of such natural person:
 - (i) full name, including any aliases;
 - (ii) unique identification number (such as an identity card number, birth certificate number or passport number);
 - (iii) residential address;
 - (iv) date of birth;
 - (v) nationality; and
- (b) verify the identity of each natural person using reliable, independent source data, documents or information.

6.10 A licensee shall verify the due authority of each natural person appointed to act on behalf of the customer by:

- (a) obtaining the appropriate documentary evidence authorising the appointment of such natural person by the customer to act on the customer's behalf; and
- (b) verifying that such natural person is the person authorised to act on the customer's behalf, through methods which include obtaining the person's specimen signature or electronic means of verification.

[MAS Notice 626A (Amendment) 2022]

6.10A Where the licensee --

- (a) has assessed that the money laundering and terrorism financing risks of the customer are not high; and
- (b) is unable to obtain the residential address of the natural person who acts or is appointed to act on behalf of the customer after taking reasonable measures,

the licensee may obtain the business address of this natural person, in lieu of the residential address.

[MAS Notice 626A (Amendment) 2022]

6.10B Where the licensee has obtained the business address of the natural person referred to in paragraph 6.10A, the licensee shall take reasonable measures to verify the business address using reliable, independent source data, documents or information.

[MAS Notice 626A (Amendment) 2022]

6.10C The licensee shall document the results of the assessment in paragraph 6.10A(a) and all the measures taken under paragraph 6.10A(b).

[MAS Notice 626A (Amendment) 2022]

6.11 Where the customer is a Singapore Government entity, the licensee shall only be required to obtain such information as may be required to confirm that the customer is a Singapore Government entity as asserted.

(IV) Identification and Verification of Identity of Beneficial Owner

6.12 Subject to paragraph 6.15, a licensee shall inquire if there exists any beneficial owner in relation to a customer.

6.13 Where there is one or more beneficial owners in relation to a customer, the licensee shall identify the beneficial owners and take reasonable measures to verify the identities of the beneficial owners using the relevant information or data obtained from reliable, independent sources. The licensee shall —

(a) for customers that are legal persons —

- (i) identify the natural persons (whether acting alone or together) who ultimately own the legal person;
- (ii) to the extent that there is doubt under subparagraph (i) as to whether the natural persons who ultimately own the legal person are the beneficial owners or where no natural persons ultimately own the legal person, identify the natural persons (if any) who ultimately control the legal person or have ultimate effective control of the legal person; and
- (iii) where no natural persons are identified under subparagraphs (i) or (ii), identify the natural persons having executive authority in the legal person, or in equivalent or similar positions;

- (b) for customers that are legal arrangements —
 - (i) for trusts, identify the settlors, the trustees, the protector (if any), the beneficiaries (including every beneficiary that falls within a designated characteristic or class)³, and any natural person exercising ultimate ownership, ultimate control or ultimate effective control over the trust (including through a chain of control or ownership); and
 - (ii) for other types of legal arrangements, identify persons in equivalent or similar positions, as those described under subparagraph (i).

[MAS Notice 626A (Amendment) 2022]

- 6.14 Where the customer is not a natural person, the licensee shall understand the nature of the customer's business and its ownership and control structure.
- 6.15 A licensee shall not be required to inquire if there exists any beneficial owner in relation to a customer that is —
 - (a) *Deleted with effect from 30 November 2015;*
 - (b) *Deleted with effect from 30 November 2015;*
 - (c) an entity listed and traded on the Singapore Exchange;
 - (d) an entity listed on a stock exchange outside of Singapore that is subject to —
 - (i) regulatory disclosure requirements; and
 - (ii) requirements relating to adequate transparency in respect of its beneficial owners (imposed through stock exchange rules, law or other enforceable means);
 - (e) a financial institution set out in Appendix 1;
 - (f) a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF; or
 - (g) an investment vehicle where the managers are financial institutions —

³ In relation to a beneficiary of a trust designated by characteristics or by class, the licensee shall obtain sufficient information about the beneficiary to satisfy itself that it will be able to establish the identity of the beneficiary —

- (a) before making a distribution to that beneficiary; or
- (b) when that beneficiary intends to exercise vested rights.

- (i) set out in Appendix 1; or
- (ii) incorporated or established outside Singapore but are subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF,

unless the licensee has doubts about the veracity of the CDD information, or suspects that the customer, business relations with, or transaction undertaken in the course of business relations for, the customer may be connected with money laundering or terrorism financing.

[MAS Notice 626A (Amendment) 2015]
[MAS Notice 626A (Amendment) 2022]

- 6.16 For the purposes of paragraphs 6.15(f) and 6.15(g)(ii), a licensee shall document the basis for its determination that the requirements in those paragraphs have been duly met.

[MAS Notice 626A (Amendment) 2022]

(V) Information on the Purpose and Intended Nature of Business Relations and Transaction Undertaken without an Account Being Opened

- 6.17 A licensee shall, when processing the application to establish business relations, or undertaking a transaction without an account being opened, understand and as appropriate, obtain from the customer information as to the purpose and intended nature of business relations.

[MAS Notice 626A (Amendment) 2022]

(VI) Ongoing Monitoring

- 6.18 A licensee shall monitor on an ongoing basis, its business relations with customers.
- 6.19 A licensee shall, during the course of business relations with a customer, observe the conduct of the customer's account and scrutinise transactions undertaken throughout the course of business relations, to ensure that the transactions are consistent with the licensee's knowledge of the customer, its business and risk profile and where appropriate, the source of funds.
- 6.19A A licensee shall perform enhanced risk mitigation measures where the transaction involves a transfer of a digital payment token to or a receipt of a digital payment token from an entity other than:

- (a) a financial institution as defined in section 27A(6) of the MAS Act; or
- (b) a financial institution incorporated or established outside Singapore that is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF.

[MAS Notice 626A (Amendment) 2022]

- 6.20 A licensee shall pay special attention to all complex, unusually large or unusual patterns of transactions, undertaken throughout the course of business relations, that have no apparent or visible economic or lawful purpose.
- 6.21 For the purposes of ongoing monitoring, a licensee shall put in place and implement adequate systems and processes, commensurate with the size and complexity of the licensee, to —
- (a) monitor its business relations with customers; and
 - (b) detect and report suspicious, complex, unusually large or unusual patterns of transactions.
- 6.22 A licensee shall, to the extent possible, inquire into the background and purpose of the transactions in paragraph 6.20 and document its findings with a view to making this information available to the relevant authorities should the need arise.
- 6.23 A licensee shall ensure that the CDD data, documents and information obtained in respect of customers, natural persons appointed to act on behalf of the customers, connected parties of the customers and beneficial owners of the customers, are relevant and kept up-to-date by undertaking reviews of existing CDD data, documents and information, particularly for higher risk categories of customers.
- 6.24 Where there are any reasonable grounds for suspicion that existing business relations with a customer are connected with money laundering or terrorism financing, and where the licensee considers it appropriate to retain the customer —
- (a) the licensee shall substantiate and document the reasons for retaining the customer; and
 - (b) the customer's business relations with the licensee shall be subject to commensurate risk mitigation measures, including enhanced ongoing monitoring.
- 6.25 Where the licensee assesses the customer or the business relations with the customer referred to in paragraph 6.24 to be of higher risk, the licensee shall perform enhanced CDD measures, which shall include obtaining the approval of the licensee's senior management to retain the customer.

CDD Measures for Non-Face-to-Face Business Relations

- 6.26 A licensee shall develop policies and procedures to address any specific risks associated with non-face-to-face business relations with a customer or transactions undertaken in the course of business relations for a customer.
- 6.27 A licensee shall implement the policies and procedures referred to in paragraph 6.26 when establishing business relations with a customer and when conducting ongoing due diligence.
- 6.28 Where there is no face-to-face contact, the licensee shall perform CDD measures that are at least as robust as those that would be required to be performed if there was face-to-face contact.

[MAS Notice 626A (Amendment) 2022]

Reliance by Licensee on Measures Already Performed

- 6.29 When a licensee (“acquiring licensee”) acquires, either in whole or in part, the business of another financial institution (whether in Singapore or elsewhere), the acquiring licensee shall perform the measures as required by paragraphs 6, 7 and 8, on the customers acquired with the business at the time of acquisition except where the acquiring licensee has —
- (a) acquired at the same time all corresponding customer records (including CDD information) and has no doubt or concerns about the veracity or adequacy of the information so acquired; and
 - (b) conducted due diligence enquiries that have not raised any doubt on the part of the acquiring licensee as to the adequacy of AML/CFT measures previously adopted in relation to the business or part thereof now acquired by the acquiring licensee, and document such enquiries.

Timing for Verification

- 6.30 Subject to paragraphs 6.31 and 6.32, a licensee shall complete verification of the identity of a customer as required by paragraph 6.8, natural persons appointed to act on behalf of the customer as required by paragraph 6.9(b) and beneficial owners of the customer as required by paragraph 6.13 —
- (a) before the licensee establishes business relations with the customer;
 - (b) before the licensee undertakes any transaction of a value exceeding S\$5,000 for the customer, other than any payment service transaction referred to in paragraph 6.30(e), where the customer has not otherwise established

business relations with the licensee;

- (c) before the licensee effects or receives any funds by domestic wire transfer, or by cross-border wire transfer for any customer who has not otherwise established business relations with the licensee;
- (d) before the licensee undertakes any transaction for the purposes of carrying on its business of providing cross-border money transfer service, for the customer, where the customer has not otherwise established business relations with the licensee;
- (e) before the licensee undertakes any payment service transaction, where the customer has not otherwise established business relations with the licensee; or
- (f) before the licensee effects or receives any digital payment token by value transfer, where the customer has not otherwise established business relations with the licensee.

[MAS Notice 626A (Amendment) 2022]

6.31 A licensee may establish business relations with a customer before completing the verification of the identity of the customer as required by paragraph 6.8, natural persons appointed to act on behalf of the customer as required by paragraph 6.9(b) and beneficial owners of the customer as required by paragraph 6.13 if —

- (a) the deferral of completion of the verification is essential in order not to interrupt the normal conduct of business operations; and
- (b) the risks of money laundering and terrorism financing can be effectively managed by the licensee.

6.32 Where the licensee establishes business relations with a customer before verifying the identity of the customer as required by paragraph 6.8, natural persons appointed to act on behalf of the customer as required by paragraph 6.9(b), and beneficial owners of the customer as required by paragraph 6.13, the licensee shall —

- (a) develop and implement internal risk management policies and procedures concerning the conditions under which such business relations may be established prior to verification; and
- (b) complete such verification as soon as is reasonably practicable.

Where Measures are Not Completed

6.33 Where the licensee is unable to complete the measures as required by paragraphs

6, 7 and 8, it shall not commence or continue business relations with any customer, or undertake any transaction for any customer. The licensee shall consider if the circumstances are suspicious so as to warrant the filing of an STR.

[MAS Notice 626A (Amendment) 2022]

- 6.34 For the purposes of paragraph 6.33, completion of the measures means the situation where the licensee has obtained, screened and verified (including by delayed verification as allowed under paragraphs 6.31 and 6.32) all necessary CDD information required under paragraphs 6, 7 and 8, and where the licensee has received satisfactory responses to all inquiries in relation to such necessary CDD information.

[MAS Notice 626A (Amendment) 2022]

Joint Account

- 6.35 In the case of a joint account, a licensee shall perform CDD measures on all of the joint account holders as if each of them were individual customers of the licensee.

[MAS Notice 626A (Amendment) 2022]

Existing Customers

- 6.36 A licensee shall perform the measures as required by paragraphs 6, 7 and 8 in relation to its existing customers, based on its own assessment of materiality and risk, taking into account any previous measures applied, the time when the measures were last applied to such existing customers and the adequacy of data, documents or information obtained.

Screening

- 6.37 A licensee shall screen a customer, natural persons appointed to act on behalf of the customer, connected parties of the customer and beneficial owners of the customer against relevant money laundering and terrorism financing information sources, as well as lists and information provided by the Authority or other relevant authorities in Singapore for the purposes of determining if there are any money laundering or terrorism financing risks in relation to the customer.

- 6.38 A licensee shall screen the persons referred to in paragraph 6.37 —

- (a) when, or as soon as reasonably practicable after, the licensee establishes business relations with a customer;
- (b) when the licensee undertakes any transactions of a value exceeding S\$5,000, other than any payment service transaction referred to in paragraph 6.38(g), for a customer who has not otherwise established business relations

with the licensee;

- (c) when the licensee effects or receives any funds by domestic wire transfer, or by cross-border wire transfer, for a customer who has not otherwise established business relations with the licensee;
- (d) when the licensee undertakes any transaction for the purposes of carrying on its business of providing cross-border money transfer service, for a customer who has not otherwise established business relations with the licensee;
- (e) on a periodic basis after the licensee establishes business relations with the customer; and
- (f) when there are any changes or updates to —
 - (i) the lists and information provided by the Authority or other relevant authorities in Singapore to the licensee; or
 - (ii) the natural persons appointed to act on behalf of a customer, connected parties of a customer or beneficial owners of a customer;
- (g) when the licensee undertakes any payment service transaction for a customer who has not otherwise established business relations with the licensee; or
- (h) when the licensee effects or receives any digital payment token by value transfer, for a customer who has not otherwise established business relations with the licensee.

[MAS Notice 626A (Amendment) 2022]

- 6.39 A licensee shall screen all wire transfer originators and wire transfer beneficiaries as defined in paragraph 12, against lists and information provided by the Authority and any other relevant authorities in Singapore for the purposes of determining if there are any money laundering or terrorism financing risks in relation to any such persons.

[MAS Notice 626A (Amendment) 2022]

- 6.39A A licensee shall screen all value transfer originators and value transfer beneficiaries as defined in paragraph 13, against lists and information provided by the Authority and any other relevant authorities in Singapore for the purposes of determining if there are any money laundering or terrorism financing risks in relation to any such persons.

[MAS Notice 626A (Amendment) 2022]

- 6.40 The results of screening and assessment by the licensee shall be documented.

6.41 For the purposes of paragraph 6, a reference to “transaction” shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

7 SIMPLIFIED CUSTOMER DUE DILIGENCE

7.1 Subject to paragraph 7.4, a licensee may perform simplified CDD measures in relation to a customer, any natural person appointed to act on behalf of the customer and any beneficial owner of the customer (other than any beneficial owner that the licensee is exempted from making inquiries about under paragraph 6.15) if it is satisfied that the risks of money laundering and terrorism financing are low.

[MAS Notice 626A (Amendment) 2015]

7.2 The assessment of low risks shall be supported by an adequate analysis of risks by the licensee.

7.3 The simplified CDD measures shall be commensurate with the level of risk, based on the risk factors identified by the licensee.

7.4 A licensee shall not perform simplified CDD measures —

- (a) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction in relation to which the FATF has called for countermeasures;
- (b) where the customers or any beneficial owner of the customer is from or in a country or jurisdiction known to have inadequate AML/CFT measures, as determined by the licensee for itself, or notified to licensees generally by the Authority, or other foreign regulatory authorities; or
- (c) where the licensee suspects that money laundering or terrorism financing is involved.

[MAS Notice 626A (Amendment) 2022]

7.5 Subject to paragraphs 7.2, 7.3 and 7.4, a licensee may perform simplified CDD measures in relation to a customer that is a financial institution set out in Appendix 2.

7.6 Where the licensee performs simplified CDD measures in relation to a customer, any natural person appointed to act on behalf of the customer and any beneficial owner of the customer, it shall document —

- (a) the details of its risk assessment; and

(b) the nature of the simplified CDD measures.

7.7 For avoidance of doubt, the term “CDD measures” in paragraph 7 means the measures required by paragraph 6.

[MAS Notice 626A (Amendment) 2015]

8 ENHANCED CUSTOMER DUE DILIGENCE

Politically Exposed Persons

8.1 For the purposes of paragraph 8 —

“close associate” means a natural person who is closely connected to a politically exposed person, either socially or professionally;

“domestic politically exposed person” means a natural person who is or has been entrusted domestically with prominent public functions;

“family member” means a parent, step-parent, child, step-child, adopted child, spouse, sibling, step-sibling and adopted sibling of the politically exposed person;

“foreign politically exposed person” means a natural person who is or has been entrusted with prominent public functions in a foreign country or jurisdiction;

[MAS Notice 626A (Amendment) 2022]

“international organisation” means an entity established by formal political agreements between member countries or jurisdictions that have the status of international treaties, whose existence is recognised by law in member countries or jurisdictions and which is not treated as a resident institutional unit of the country or jurisdiction in which it is located;

[MAS Notice 626A (Amendment) 2022]

“international organisation politically exposed person” means a natural person who is or has been entrusted with prominent public functions in an international organisation;

“politically exposed person” means a domestic politically exposed person, foreign politically exposed person or international organisation politically exposed person; and

“prominent public functions” includes the roles held by a head of state, a head of

government, government ministers, senior civil or public servants, senior judicial or military officials, senior executives of state owned corporations, senior political party officials, members of the legislature and senior management of international organisations.

- 8.2 A licensee shall implement appropriate internal risk management systems, policies, procedures and controls to determine if a customer, any natural person appointed to act on behalf of the customer, any connected party of the customer or any beneficial owner of the customer is a politically exposed person, or a family member or close associate of a politically exposed person.
- 8.3 A licensee shall, in addition to performing CDD measures (specified in paragraph 6), perform at least the following enhanced CDD measures where a customer or any beneficial owner of the customer is determined by the licensee to be a politically exposed person, or a family member or close associate of a politically exposed person under paragraph 8.2:
- (a) obtain approval from the licensee's senior management to establish or continue business relations with, or undertake any transaction without an account being opened for the customer;
 - (b) establish, by appropriate and reasonable means, the source of wealth and source of funds of the customer and any beneficial owner of the customer; and
 - (c) conduct, during the course of business relations with the customer, enhanced monitoring of business relations with the customer. In particular, the licensee shall increase the degree and nature of monitoring of the business relations with and transactions for the customer, in order to determine whether they appear unusual or suspicious.

[MAS Notice 626A (Amendment) 2022]

- 8.4 A licensee may adopt a risk-based approach in determining whether to perform enhanced CDD measures or the extent of enhanced CDD measures to be performed for —
- (a) domestic politically exposed persons, their family members and close associates;
 - (b) international organisation politically exposed persons, their family members and close associates; or
 - (c) politically exposed persons who have stepped down from their prominent public functions, taking into consideration the level of influence such persons may continue to exercise after stepping down from their prominent public

functions, their family members and close associates,

except in cases where their business relations or transactions with the licensee present a higher risk for money laundering or terrorism financing.

Other Higher Risk Categories

8.5 A licensee shall implement appropriate internal risk management systems, policies, procedures and controls to determine if business relations with, or transactions undertaken in the course of business relations for, any customer present a higher risk for money laundering or terrorism financing.

8.6 For the purposes of paragraph 8.5, circumstances where a customer presents or may present a higher risk for money laundering or terrorism financing include but are not limited to the following:

(a) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction in relation to which the FATF has called for countermeasures, the licensee shall treat any business relations with, or transactions undertaken in the course of business relations for, any such customer as presenting a higher risk of money laundering or terrorism financing;

(b) where a customer or any beneficial owner of the customer is from or in a country or jurisdiction known to have inadequate AML/CFT measures, as determined by the licensee for itself, or notified to licensees generally by the Authority or other foreign regulatory authorities, the licensee shall assess whether any such customer presents a higher risk for money laundering or terrorism financing; and

(c) where a customer is a legal person for which the licensee is not able to establish if it has any -

(i) ongoing, apparent or visible operation or business activity;

(ii) economic or business purpose for its corporate structure or arrangement; or

(i) substantive financial activity in its interactions with the licensee,

the licensee shall assess whether any such customer presents a higher risk for money laundering or terrorism financing.

[MAS Notice 626A (Amendment) 2015]

[MAS Notice 626A (Amendment) 2022]

8.7 A licensee shall perform the appropriate enhanced CDD measures in paragraph 8.3

for business relations with, or transactions undertaken in the course of business relations for, any customer —

- (a) who the licensee determines under paragraph 8.5; or
- (b) the Authority or other relevant authorities in Singapore notify to the licensee, as presenting a higher risk for money laundering or terrorism financing.

8.8 A licensee shall, in taking enhanced CDD measures to manage and mitigate any higher risks that have been identified by the licensee, or notified to it by the Authority or other relevant authorities in Singapore, ensure that the enhanced CDD measures take into account the requirements of any laws, regulations or directions administered by the Authority, including but not limited to the regulations or directions issued by the Authority under section 27A of the MAS Act.

[MAS Notice 626A (Amendment) 2022]

8.9 For the purposes of paragraph 8, a reference to “transaction” shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

9 RELIANCE ON THIRD PARTIES

9.1 For the purposes of paragraph 9, “third party” means —

- (a) a financial institution set out in Appendix 2; or
- (b) a financial institution which is subject to and supervised by a foreign authority for compliance with AML/CFT requirements consistent with standards set by the FATF (other than a holder of a payment services licence under the PS Act).

[MAS Notice 626A (Amendment) 2022]

9.2 Subject to paragraph 9.3, a licensee may rely on a third party to perform the measures as required by paragraphs 6, 7 and 8 if the following requirements are met:

- (a) the licensee is satisfied that the third party it intends to rely upon is subject to and supervised for compliance with AML/CFT requirements consistent with standards set by the FATF, and has adequate AML/CFT measures in place to comply with those requirements;
- (b) the licensee takes appropriate steps to identify, assess and understand the money laundering and terrorism financing risks particular to the countries or jurisdictions that the third party operates in;

- (c) the third party is not one which licensees have been specifically precluded by the Authority from relying upon; and
- (d) the third party is able and willing to provide, without delay, upon the licensee's request, any data, documents or information obtained by the third party with respect to the measures applied on the licensee's customer, which the licensee would be required or would want to obtain.

9.3 No licensee shall rely on a third party to conduct ongoing monitoring of business relations with customers.

9.4 Where a licensee relies on a third party to perform the measures as required by paragraphs 6, 7 and 8, it shall —

- (a) document the basis for its satisfaction that the requirements in paragraphs 9.2(a) and (b) have been met, except where the third party is a financial institution set out in Appendix 2; and
- (b) immediately obtain from the third party the CDD information which the third party had obtained.

[MAS Notice 626A (Amendment) 2022]

9.5 For the avoidance of doubt, notwithstanding the reliance upon a third party, the licensee shall remain responsible for its AML/CFT obligations in this Notice.

10 ISSUANCE OF BEARER NEGOTIABLE INSTRUMENTS AND RESTRICTION OF CASH PAYOUT

10.1 For the purposes of Paragraph 10 —

“payment transaction” has the same meaning as defined in section 2(1) of the PS Act.

[MAS Notice 626A (Amendment) 2022]

Prohibition of Issuance of Bearer Negotiable Instruments

10.2 No licensee shall, in respect of –

- (a) a payment transaction processed, accepted or executed in the course of carrying on its business of providing a money-changing service;
- (b) a payment transaction received from another country or jurisdiction to Singapore in the course of carrying on its business of providing a cross-border money transfer service;

- (c) a payment transaction received in the course of carrying on its business of providing a domestic money transfer service;
- (d) a withdrawal from a payment account in the course of carrying on its business of providing an account issuance service;
- (e) a payment service transaction; or
- (f) an FX transaction,

make any payment for any sum or money in the form of a bearer negotiable instrument to any recipient or to any person appointed to act on behalf of a recipient.

[MAS Notice 626A (Amendment) 2022]

Restriction on Cash Payouts by Licensee

10.3 No licensee shall, in respect of –

- (a) a payment transaction received from another country or jurisdiction to Singapore in the course of carrying on its business of providing a cross-border money transfer service,
- (b) a payment transaction received in the course of carrying on its business of providing a domestic money transfer service;
- (c) a withdrawal from a payment account in the course of carrying on its business of providing an account issuance service;
- (d) a payment service transaction; or
- (e) an FX transaction,

pay any cash in an amount that is equal to or exceeds S\$20,000 to any recipient or person appointed to act on behalf of a recipient.

[MAS Notice 626A (Amendment) 2022]

10.4 Where a licensee suspects that two or more payment transactions or FX transactions, as the case may be, are or may be related, linked or the result of a deliberate restructuring of an otherwise single transaction into smaller transactions in order to evade the measures provided for in paragraph 10.3, the licensee shall treat the payment transactions or FX transactions, as the case may be, as a single transaction and aggregate their value for the purposes of paragraph 10.3.

[MAS Notice 626A (Amendment) 2022]

10.5 A licensee may make any payment of S\$20,000 and above by cheque if all the following conditions are met:

- (a) the cheque is crossed and made payable to a customer who is an account holder with a bank in Singapore; and
- (b) the licensee maintains a register of all crossed cheques issued with the corresponding transaction reference numbers.

[MAS Notice 626A (Amendment) 2022]

10.6 Paragraph 10 shall not apply to any licensee that holds a casino licence under section 49 of the Casino Control Act 2006.

[MAS Notice 626A (Amendment) 2022]

11 CORRESPONDENT ACCOUNTS

11.1 Paragraph 11 applies to a licensee when either of the following occurs:

- (a) it provides correspondent account services or other similar services to a financial institution that is operating in or outside Singapore; or
- (b) it engages a financial institution that is operating in or outside Singapore to provide or to facilitate the provision of correspondent account services or other similar services, where such financial institution is not —
 - (i) a bank in Singapore; or
 - (ii) a merchant bank in Singapore.

[MAS Notice 626A (Amendment) 2022]

11.2 For the purposes of paragraph 11 —

“correspondent account services” means:

- (a) the provision of services by a licensee to a respondent financial institution, whether for the respondent financial institution as principal or for that respondent financial institution’s customers; or
- (b) the provision of services, or the facilitation thereof, by a correspondent financial institution to a licensee, whether for the licensee as principal or for

that licensee's customers;

[MAS Notice 626A (Amendment) 2022]

“correspondent financial institution” means a financial institution that provides or facilitates the provision of correspondent account services or other similar services to the licensee;

[MAS Notice 626A (Amendment) 2022]

“payable-through account” means an account maintained with the licensee by the respondent financial institution for the provision of correspondent account services, but which is accessible directly by a third party to effect transactions on its own behalf;

[MAS Notice 626A (Amendment) 2022]

“respondent financial institution” means a financial institution to which correspondent account services or other similar services are provided by a licensee;

[MAS Notice 626A (Amendment) 2022]

“shell financial institution” means a financial institution incorporated, formed or established in a country or jurisdiction where the financial institution has no physical presence and which is unaffiliated with a financial group that is subject to effective consolidated supervision; and

[MAS Notice 626A (Amendment) 2022]

“similar services” include:

- (a) services undertaken for transactions or funds transfers, for the respondent financial institution, whether as principal or for its customers; and
- (b) services undertaken for transactions or funds transfers, for the licensee for whom a correspondent financial institution provides correspondent account services to, whether as principal or for its customers.

[MAS Notice 626A (Amendment) 2022]

11.3 A licensee in Singapore shall perform the following measures, in addition to CDD measures as required by paragraphs 6, 7 and 8, when providing correspondent account services or other similar services:

- (a) assess the suitability of the respondent financial institution by taking the following steps:
 - (i) gather adequate information about the respondent financial institution

to understand fully the nature of the respondent financial institution's business, including making appropriate inquiries on its management, its major business activities and the countries or jurisdictions in which it operates;

- (ii) determine from any available sources the reputation of the respondent financial institution and the quality of supervision over the respondent financial institution, including whether it has been the subject of money laundering or terrorism financing investigation or regulatory action; and
 - (iii) assess the respondent financial institution's AML/CFT controls and ascertain that they are adequate and effective, having regard to the AML/CFT measures of the country or jurisdiction in which the respondent financial institution operates;
- (b) clearly understand and document the respective AML/CFT responsibilities of the licensee and the respondent financial institution; and
 - (c) obtain approval from the licensee's senior management before providing correspondent account services or similar services to a new financial institution.

[MAS Notice 626A (Amendment) 2022]

11.4 Where the provision of correspondent account services or similar services by the licensee involve a payable-through account, the licensee shall be satisfied that —

- (a) the respondent financial institution has performed appropriate measures at least equivalent to those specified in paragraph 6 on the third party having direct access to the payable-through account; and
- (b) the respondent financial institution is able to perform ongoing monitoring of its business relations with that third party and is willing and able to provide CDD information to the licensee upon request.

[MAS Notice 626A (Amendment) 2022]

11.5 A licensee in Singapore shall perform the following measures, in addition to CDD measures as required by paragraphs 6, 7 and 8, when receiving correspondent account services or other similar services:

- (a) assess the suitability of the correspondent financial institution by taking the following steps:
 - (i) gather adequate information about the correspondent financial institution to understand fully the nature of the correspondent financial

institution's business, including making appropriate inquiries on its management, its major business activities and the countries or jurisdictions in which it operates;

- (ii) determine from any available sources the reputation of the correspondent financial institution and the quality of supervision over the correspondent financial institution, including whether it has been the subject of money laundering or terrorism financing investigation or regulatory action; and
- (iii) assess the correspondent financial institution's AML/CFT controls and ascertain that they are adequate and effective, having regard to the AML/CFT measures of the country or jurisdiction in which the correspondent financial institution operates;

- (b) clearly understand and document the respective AML/CFT responsibilities of the licensee and the correspondent financial institution; and
- (c) obtain approval from the licensee's senior management before receiving correspondent account services or similar services from a new financial institution.

[MAS Notice 626A (Amendment) 2022]

11.6 The licensee shall document the basis for its satisfaction that the requirements in paragraphs 11.3 to 11.5 are met.

[MAS Notice 626A (Amendment) 2022]

11.7 No licensee shall enter into or continue correspondent account services or other similar services relationship with another financial institution that does not have adequate controls against money laundering or terrorism financing activities, is not effectively supervised by the relevant authorities or is a shell financial institution.

[MAS Notice 626A (Amendment) 2022]

11.8 A licensee shall also take appropriate measures when establishing correspondent account services or other similar services relationship, to satisfy itself that its respondent or correspondent financial institutions do not permit their accounts to be used by shell financial institutions.

[MAS Notice 626A (Amendment) 2022]

11.9 A licensee shall maintain a current list of the financial institutions that it provides or receives correspondent account services or other similar services. The licensee shall make the list accessible to the Authority and to other relevant authorities in the countries or jurisdictions where the financial institutions operate, upon request.

[MAS Notice 626A (Amendment) 2022]

- 11.10 For the purposes of this paragraph, a reference to “transaction” shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

12 WIRE TRANSFERS

- 12.1 Paragraph 12 shall apply to a licensee when it effects the sending of funds by wire transfer or when it receives funds by wire transfer on the account of the wire transfer originator or the wire transfer beneficiary but shall not apply to a transfer and settlement between the licensee and another financial institution where the licensee and the other financial institution are acting on their own behalf as the wire transfer originator and the wire transfer beneficiary.

[MAS Notice 626A (Amendment) 2022]

- 12.2 For the purposes of paragraph 12 —

“batch transfer” means a transfer comprising a number of individual wire transfers that are sent by a wire transfer originator to the same financial institutions, irrespective of whether the individual wire transfers are intended ultimately for one or more wire transfer beneficiaries;

[MAS Notice 626A (Amendment) 2022]

“intermediary institution” means the financial institution that receives and transmits a wire transfer on behalf of the ordering institution and the beneficiary institution, or another intermediary institution;

[MAS Notice 626A (Amendment) 2022]

“straight-through processing” means payment transactions that are conducted electronically without the need for manual intervention;

[MAS Notice 626A (Amendment) 2022]

“unique transaction reference number” means a combination of letters, numbers or symbols, determined by the licensee or ordering institution, in accordance with the protocols of the payment and settlement system or messaging system used for the wire transfer, and which permits the traceability of the wire transfer;

[MAS Notice 626A (Amendment) 2022]

“wire transfer beneficiary” means the natural person, legal person or legal

arrangement who is identified by the wire transfer originator as the receiver of the wire transfer funds; and

[MAS Notice 626A (Amendment) 2022]

“wire transfer originator” means the account holder who allows the wire transfer from that account, or where there is no account, the natural person, legal person or legal arrangement that places the wire transfer order with the ordering institution to perform the wire transfer.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Ordering Institution

(I) Identification and Recording of Information

12.3 Before effecting a wire transfer, every licensee that is an ordering institution shall —

- (a) identify the wire transfer originator and take reasonable measures to verify the wire transfer originator’s identity, as the case may be (if the licensee has not already done so by virtue of paragraph 6); and
- (b) record adequate details of the wire transfer so as to permit its reconstruction, including but not limited to, the date of the wire transfer, the type and amount of currency transferred and the value date.

[MAS Notice 626A (Amendment) 2022]

(II) Cross-Border Wire Transfers Below or Equal To S\$1,500

12.4 Subject to paragraph 12.5, in a cross-border wire transfer where the amount to be transferred is below or equal to S\$1,500, every licensee which is an ordering institution shall include in the message or payment instruction that accompanies or relates to the wire transfer the following:

- (a) the name of the wire transfer originator;
- (b) the wire transfer originator’s account number (or unique transaction reference number where no account number exists);
- (c) the name of the wire transfer beneficiary; and
- (d) the wire transfer beneficiary’s account number (or unique transaction reference number where no account number exists).

[MAS Notice 626A (Amendment) 2022]

- 12.5 In a cross-border wire transfer where the amount to be transferred is below or equal to S\$1,500, every licensee which is an ordering institution may, in the message or payment instruction that accompanies or relates to the wire transfer to an intermediary institution in Singapore, include only the unique transaction reference number and the wire transfer beneficiary information set out in paragraphs 12.4(c) and (d), provided that —
- (a) the unique transaction reference number will permit the transaction to be traced back to the wire transfer originator and wire transfer beneficiary;
 - (b) the ordering institution shall provide the wire transfer originator information and wire transfer beneficiary information set out in paragraphs 12.4(a) to (d) within 3 business days of a request for such information by the intermediary institution in Singapore, the Authority or other relevant authorities in Singapore;
 - (c) the ordering institution shall provide the wire transfer originator information and wire transfer beneficiary information set out in paragraphs 12.4(a) to (d) immediately upon request for such information by law enforcement authorities in Singapore; and
 - (d) the ordering institution shall provide the wire transfer originator information and wire transfer beneficiary information set out in paragraphs 12.4(a) to (d) to the beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

(III) Cross-border Wire Transfers Exceeding S\$1,500

- 12.6 Subject to paragraphs 7.1 and 11.8, in a cross-border wire transfer where the amount to be transferred exceeds S\$1,500, every licensee which is an ordering institution shall identify the wire transfer originator and verify the wire transfer originator's identity, and include in the message or payment instruction that accompanies or relates to the wire transfer the information required by paragraphs 12.4(a) to 12.4(d) and any of the following:
- (a) the wire transfer originator's —
 - (i) residential address, or
 - (ii) registered or business address, and if different, principal place of business,as may be appropriate;

- (b) the wire transfer originator's unique identification number (such as an identity card number, birth certificate number or passport number, or where the wire transfer originator is not a natural person, the incorporation number or business registration number); or
- (c) the date and place of birth, incorporation or registration of the wire transfer originator (as may be appropriate).

[MAS Notice 626A (Amendment) 2022]

12.7 Where several individual cross-border wire transfers from a single wire transfer originator are bundled in a batch file for transmission to wire transfer beneficiaries, a licensee shall ensure that the batch transfer file contains —

- (a) the wire transfer originator information required by paragraph 12.6⁴ and which has been verified; and
- (b) the wire transfer beneficiary information required by paragraph 12.6⁵,

which are fully traceable within the beneficiary country or jurisdiction.

[MAS Notice 626A (Amendment) 2022]

12.8 In a cross-border wire transfer where the amount to be transferred exceeds S\$1,500, every licensee which is an ordering institution may, in the message or payment instruction that accompanies or relates to the wire transfer to an intermediary institution in Singapore, include only the unique transaction reference number and the wire transfer beneficiary information required by paragraph 12.6⁶, provided that:

- (a) the unique transaction reference number will permit the transaction to be traced back to the wire transfer originator and wire transfer beneficiary;
- (b) the ordering institution shall provide the wire transfer originator information and wire transfer beneficiary information set out in paragraph 12.6⁷ within 3 business days of a request for such information by the intermediary institution in Singapore, the Authority or other relevant authorities in Singapore;
- (c) the ordering institution shall provide the wire transfer originator information

⁴ Please note the references to paragraphs 12.4 (a) and (b) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

⁵ Please note the references to paragraphs 12.4 (c) and (d) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

⁶ Please note the references to paragraphs 12.4 (c) and (d) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

⁷ Please note the references to paragraphs 12.4 (a) to (d) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

and wire transfer beneficiary information set out in paragraph 12.6⁸ immediately upon request for such information by law enforcement authorities in Singapore; and

- (d) the ordering institution shall provide the wire transfer originator information and wire transfer beneficiary information set out in paragraph 12.6⁹ to the beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

(IV) Domestic Wire Transfers

12.9 In a domestic wire transfer, every licensee that is an ordering institution shall either —

- (a) include in the message or payment instruction that accompanies or relates to the wire transfer the following:

- (i) the name of the wire transfer originator;
- (ii) the wire transfer originator's account number (or unique transaction reference number where no account number exists); and

- (iii) any of the following:

- (A) the wire transfer originator's:

- (1) residential address; or
- (2) registered or business address, and if different, principal place of business,

as may be appropriate;

- (B) the wire transfer originator's unique national identification number (such as an identity card number, birth certificate number or passport number, or where the wire transfer originator is not a natural person, the incorporation number or business registration number);

- (C) the date and place of birth, incorporation or registration of the wire transfer originator (as may be appropriate); or

⁸ Please note the references to paragraphs 12.4 (a) to (d) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

⁹ Please note the references to paragraphs 12.4 (a) to (d) in paragraph 12.6.

[MAS Notice 626A (Amendment) 2022]

- (b) include only the wire transfer originator's account number (or unique transaction reference number where no account number exists), provided —
 - (i) that these details will permit the transaction to be traced back to the wire transfer originator and wire transfer beneficiary;
 - (ii) the ordering institution shall provide the wire transfer originator information set out in paragraph 12.9(a) within 3 business days of a request for such information by the beneficiary institution, the Authority or other relevant authorities in Singapore; and
 - (iii) the ordering institution shall provide the wire transfer originator information set out in paragraph 12.9(a) immediately upon request for such information by law enforcement authorities in Singapore.

[MAS Notice 626A (Amendment) 2022]

12.10 All wire transfer originator and beneficiary information collected by the ordering institution shall be documented.

[MAS Notice 626A (Amendment) 2022]

12.11 Where the ordering institution is unable to comply with the requirements in paragraphs 12.3 to 12.10, it shall not execute the wire transfer.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Beneficiary Institution

12.12 A licensee that is a beneficiary institution shall take reasonable measures, including post-event monitoring or real-time monitoring where feasible, to identify cross-border wire transfers that lack the required wire transfer originator or required wire transfer beneficiary information.

[MAS Notice 626A (Amendment) 2022]

12.13 For cross-border wire transfers where the beneficiary institution pays out funds in cash or cash equivalent to the wire transfer beneficiary in Singapore, a beneficiary institution shall identify and verify the identity of the wire transfer beneficiary if the identity has not been previously verified.

[MAS Notice 626A (Amendment) 2022]

12.14 A licensee that is a beneficiary institution shall implement appropriate internal risk-based policies, procedures and controls for determining —

- (a) when to execute, reject, or suspend a wire transfer lacking required wire transfer originator or wire transfer beneficiary information; and
- (b) the appropriate follow-up action.

[MAS Notice 626A (Amendment) 2022]

12.15 For a licensee that controls both the ordering institution and the beneficiary institution, it shall —

- (a) take into account all the information from both the ordering institution and the beneficiary institution in order to determine whether an STR has to be filed; and
- (b) where applicable, file an STR in any country or jurisdiction affected by the suspicious wire transfer, and make relevant transaction information available to the relevant authorities.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Intermediary Institution

12.16 A licensee that is an intermediary institution shall retain all the information accompanying the wire transfer.

[MAS Notice 626A (Amendment) 2022]

12.17 Where a licensee that is an intermediary institution effects a wire transfer to another intermediary institution or a beneficiary institution, the licensee shall provide the information accompanying the wire transfer, to that other intermediary institution or beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

12.18 Where technical limitations prevent the required wire transfer originator or wire transfer beneficiary information accompanying a cross-border wire transfer from remaining with a related domestic wire transfer, a record shall be kept, for at least five years, by the receiving intermediary institution of all the information received from the ordering institution or another intermediary institution.

[MAS Notice 626A (Amendment) 2022]

12.19 An intermediary institution shall take reasonable measures, which are consistent with straight-through processing, to identify cross-border wire transfers that lack the required wire transfer originator or wire transfer beneficiary information.

[MAS Notice 626A (Amendment) 2022]

- 12.20 An intermediary institution shall implement appropriate internal risk-based policies, procedures and controls for determining —
- (a) when to execute, reject, or suspend a wire transfer lacking required wire transfer originator or wire transfer beneficiary information; and
 - (b) the appropriate follow-up action.

[MAS Notice 626A (Amendment) 2022]

13 VALUE TRANSFERS

- 13.1 Paragraph 13 shall apply to a licensee when it effects the sending of one or more digital payment tokens by value transfer or when it receives one or more digital payment tokens by value transfer on the account of the value transfer originator or the value transfer beneficiary but shall not apply to a transfer and settlement between the licensee and another financial institution where the licensee and the other financial institution are acting on their own behalf as the value transfer originator and the value transfer beneficiary.

[MAS Notice 626A (Amendment) 2022]

- 13.2 For the purposes of paragraph 13 —

“batch transfer” means a transfer comprising a number of individual value transfers that are sent by a value transfer originator to the same financial institutions, irrespective of whether the individual value transfers are intended ultimately for one or more value transfer beneficiaries;

[MAS Notice 626A (Amendment) 2022]

“intermediary institution” means the financial institution that receives and transmits a value transfer on behalf of the ordering institution and the beneficiary institution, or another intermediary institution;

[MAS Notice 626A (Amendment) 2022]

“straight-through processing” means payment transactions that are conducted electronically without the need for manual intervention;

[MAS Notice 626A (Amendment) 2022]

“unique transaction reference number” means a combination of letters, numbers or symbols, determined by the licensee or ordering institution, in accordance with the

protocols of the payment and settlement system or messaging system used for the value transfer, and which permits the traceability of the value transfer;

[MAS Notice 626A (Amendment) 2022]

“value transfer beneficiary” means the natural person, legal person or legal arrangement who is identified by the value transfer originator as the receiver of the digital payment tokens transferred; and

[MAS Notice 626A (Amendment) 2022]

“value transfer originator” means the account holder who allows the value transfer from that account, or where there is no account, the natural person, legal person or legal arrangement that places the value transfer order with the ordering institution to perform the value transfer.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Ordering Institution

(I) Identification and Recording of Information

13.3 Before effecting a value transfer, every licensee that is an ordering institution shall

- (a) identify the value transfer originator and take reasonable measures to verify the value transfer originator’s identity, as the case may be (if the licensee has not already done so by virtue of paragraph 6); and
- (b) record adequate details of the value transfer so as to permit its reconstruction, including but not limited to, the date of the value transfer, the type and value of digital payment token(s) transferred and the value date.

[MAS Notice 626A (Amendment) 2022]

(II) Value Transfers Below or Equal To S\$1,500

13.4 Subject to paragraph 13.5, in a value transfer where the amount to be transferred is below or equal to S\$1,500, every licensee which is an ordering institution shall include in the message or payment instruction that accompanies or relates to the value transfer the following:

- (a) the name of the value transfer originator;
- (b) the value transfer originator’s account number (or unique transaction reference number where no account number exists);

- (c) the name of the value transfer beneficiary; and
- (d) the value transfer beneficiary's account number (or unique transaction reference number where no account number exists).

[MAS Notice 626A (Amendment) 2022]

13.5 In a value transfer where the amount to be transferred is below or equal to S\$1,500, every licensee which is an ordering institution may, in the message or payment instruction that accompanies or relates to the value transfer to an intermediary institution in Singapore, include only the unique transaction reference number and the value transfer beneficiary information set out in paragraphs 13.4(c) and (d), provided that —

- (a) the unique transaction reference number will permit the transaction to be traced back to the value transfer originator and value transfer beneficiary;
- (b) the ordering institution shall provide the value transfer originator information and value transfer beneficiary information set out in paragraphs 13.4(a) to (d) within 3 business days of a request for such information by the intermediary institution in Singapore, the Authority or other relevant authorities in Singapore;
- (c) the ordering institution shall provide the value transfer originator information and value transfer beneficiary information set out in paragraphs 13.4(a) to (d) immediately upon request for such information by law enforcement authorities in Singapore; and
- (d) the ordering institution shall provide the value transfer originator information and value transfer beneficiary information set out in paragraphs 13.4(a) to (d) to the beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

(III) Value Transfers Exceeding S\$1,500

13.6 Subject to paragraph 13.8, in a value transfer where the amount to be transferred exceeds S\$1,500, every licensee which is an ordering institution shall identify the value transfer originator and verify the value transfer originator's identity, and include in the message or payment instruction that accompanies or relates to the value transfer the information required by paragraphs 13.4(a) to 13.4(d) and any of the following:

- (a) the value transfer originator's —

- (i) residential address, or
- (ii) registered or business address, and if different, principal place of business,

as may be appropriate;

- (b) the value transfer originator's unique identification number (such as an identity card number, birth certificate number or passport number, or where the value transfer originator is not a natural person, the incorporation number or business registration number); or
- (c) the date and place of birth, incorporation or registration of the value transfer originator (as may be appropriate).

[MAS Notice 626A (Amendment) 2022]

13.7 Where several individual value transfers from a single value transfer originator are bundled in a batch file for transmission to value transfer beneficiaries, a licensee shall ensure that the batch transfer file contains —

- (a) the value transfer originator information required by paragraph 13.6¹⁰ and which has been verified; and
- (b) the value transfer beneficiary information required by paragraph 13.6¹¹,

which are fully traceable within the beneficiary country or jurisdiction.

[MAS Notice 626A (Amendment) 2022]

13.8 In a value transfer where the amount to be transferred exceeds S\$1,500, every licensee which is an ordering institution may, in the message or payment instruction that accompanies or relates to the value transfer to an intermediary institution in Singapore, include only the unique transaction reference number and the value transfer beneficiary information required by paragraph 13.6¹², provided that:

- (a) the unique transaction reference number will permit the transaction to be traced back to the value transfer originator and value transfer beneficiary;
- (b) the ordering institution shall provide the value transfer originator information

¹⁰ Please note the references to paragraphs 13.4 (a) and (b) in paragraph 13.6.

[MAS Notice 626A (Amendment) 2022]

¹¹ Please note the references to paragraphs 13.4 (c) and (d) in paragraph 13.6.

[MAS Notice 626A (Amendment) 2022]

¹² Please note the references to paragraphs 13.4 (c) and (d) in paragraph 13.6.

[MAS Notice 626A (Amendment) 2022]

and value transfer beneficiary information set out in paragraph 13.6¹³ within 3 business days of a request for such information by the intermediary institution in Singapore, the Authority or other relevant authorities in Singapore;

- (c) the ordering institution shall provide the value transfer originator information and value transfer beneficiary information set out in paragraph 13.6¹⁴ immediately upon request for such information by law enforcement authorities in Singapore; and
- (d) the ordering institution shall provide the value transfer originator information and value transfer beneficiary information set out in paragraph 13.6 to the beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

13.9 All value transfer originator and value transfer beneficiary information collected by the ordering institution shall be immediately and securely submitted to the beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

13.10 All value transfer originator and value transfer beneficiary information collected by the ordering institution shall be documented.

[MAS Notice 626A (Amendment) 2022]

13.11 Where the ordering institution is unable to comply with the requirements in paragraphs 13.3 to 13.10, it shall not execute the value transfer.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Beneficiary Institution

13.12 A licensee that is a beneficiary institution shall take reasonable measures, including post-event monitoring or real-time monitoring where feasible, to identify value transfers that lack the required value transfer originator or required value-transfer beneficiary information.

[MAS Notice 626A (Amendment) 2022]

¹³ Please note the references to paragraphs 13.4 (a) to (d) in paragraph 13.6.

[MAS Notice 626A (Amendment) 2022]

¹⁴ Please note the references to paragraphs 13.4 (a) to (d) in paragraph 13.6.

[MAS Notice 626A (Amendment) 2022]

13.13 For value transfers where the beneficiary institution pays out the transferred digital payment token(s) in cash or cash equivalent to the value transfer beneficiary in Singapore, a beneficiary institution shall identify and verify the identity of the value transfer beneficiary if the identity has not been previously verified.

[MAS Notice 626A (Amendment) 2022]

13.14 A licensee that is a beneficiary institution shall implement appropriate internal risk-based policies, procedures and controls for determining —

- (a) when to execute, reject, or suspend a value transfer lacking required value transfer originator or value transfer beneficiary information; and
- (b) the appropriate follow-up action.

[MAS Notice 626A (Amendment) 2022]

13.15 For a licensee that controls both the ordering institution and the beneficiary institution, it shall —

- (a) take into account all the information from both the ordering institution and the beneficiary institution in order to determine whether an STR has to be filed; and
- (b) where applicable, file an STR in any country or jurisdiction affected by the value transfer, and make transaction information available to the relevant authorities.

[MAS Notice 626A (Amendment) 2022]

Responsibility of the Intermediary Institution

13.16 A licensee that is an intermediary institution shall retain all the information accompanying the value transfer.

[MAS Notice 626A (Amendment) 2022]

13.17 Where a licensee that is an intermediary institution effects a value transfer to another intermediary institution or a beneficiary institution, the licensee shall immediately and securely provide the information accompanying the value transfer, to that other intermediary institution or beneficiary institution.

[MAS Notice 626A (Amendment) 2022]

13.18 Where technical limitations prevent the required value transfer originator or value transfer beneficiary information accompanying a value transfer from remaining with

a related value transfer, a record shall be kept, for at least five years, by the receiving intermediary institution of all the information received from the ordering institution or another intermediary institution.

[MAS Notice 626A (Amendment) 2022]

13.19 An intermediary institution shall take reasonable measures, which are consistent with straight-through processing, to identify value transfers that lack the required value transfer originator or value transfer beneficiary information.

[MAS Notice 626A (Amendment) 2022]

13.20 An intermediary institution shall implement appropriate internal risk-based policies, procedures and controls for determining —

- (a) when to execute, reject, or suspend a value transfer lacking required value transfer originator or value transfer beneficiary information; and
- (b) the appropriate follow-up action.

[MAS Notice 626A (Amendment) 2022]

13.21 For the purposes of paragraph 13, a reference to “transaction” shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

14 RECORD KEEPING

14.1 A licensee shall, in relation to all data, documents and information that the licensee is required to obtain or produce to meet the requirements under this Notice, prepare, maintain and retain records of such data, documents and information.

14.2 A licensee shall perform the measures as required by paragraph 14.1 such that —

- (a) all requirements imposed by law (including this Notice) are met;
- (b) any individual transaction undertaken by the licensee in the course of business relations can be reconstructed (including the amount and type of currency involved) so as to provide, if necessary, evidence for prosecution of criminal activity;
- (c) the Authority or other relevant authorities in Singapore and the internal and external auditors of the licensee are able to review the licensee's business relations, transactions undertaken in the course of business relations, records

and CDD information and assess the level of compliance with this Notice; and

- (d) the licensee can satisfy, within a reasonable time or any more specific time period imposed by law or by the requesting authority, any enquiry or order from the relevant authorities in Singapore for information.

14.3 Subject to paragraph 14.5 and any other requirements imposed by law, a licensee shall, for the purposes of record retention under paragraphs 14.1 and 14.2 and when setting its record retention policies, comply with the following record retention periods:

- (a) for CDD information relating to the business relations, wire transfers, value transfers, and transactions undertaken in the course of business relations, as well as account files, business correspondence and results of any analysis undertaken, a period of at least 5 years following the termination of such business relations or completion of such wire transfers, value transfers or transactions; and
- (b) for data, documents and information relating to a transaction undertaken in the course of business relations, including any information needed to explain and reconstruct the transaction, a period of at least 5 years following the completion of the transaction.

[MAS Notice 626A (Amendment) 2022]

14.4 A licensee may retain data, documents and information as originals or copies, in paper or electronic form or on microfilm, provided that they are admissible as evidence in a Singapore court of law.

14.6 A licensee shall retain records of data, documents and information on all its business relations with, or transactions undertaken in the course of business relations with, a customer pertaining to a matter which is under investigation or which has been the subject of an STR, in accordance with any request or order from STRO or other relevant authorities in Singapore.

14.7 For the purposes of paragraph 14, a reference to “transaction” shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

15 PERSONAL DATA

15.1 For the purposes of paragraph 15, “individual” means a natural person, whether living or deceased.

15.2 Subject to paragraph 15.3 and for the purposes of complying with this Notice, a licensee shall not be required to provide an individual customer, an individual

appointed to act on behalf of a customer, an individual connected party of a customer or an individual beneficial owner of a customer, with —

- (a) any access to personal data about the individual that is in the possession or under the control of the licensee;
- (b) any information about the ways in which the personal data of the individual under subparagraph (a) has been or may have been used or disclosed by the licensee; and
- (c) any right to correct an error or omission of the personal data about the individual that is in the possession or under the control of the licensee.

15.3 A licensee shall, as soon as reasonably practicable, upon the request of an individual customer, an individual appointed to act on behalf of a customer, an individual connected party of a customer or an individual beneficial owner of a customer, provide the requesting individual with the right to —

- (a) access the following types of personal data of that individual, that is in the possession or under the control of the licensee:
 - (i) the individual's full name, including any alias;
 - (ii) the individual's unique identification number (such as an identity card number, birth certificate number or passport number);
 - (iii) the individual's residential address;
 - (iv) the individual's date of birth;
 - (v) the individual's nationality;
 - (vi) subject to sections 21(2) and (3) read with the Fifth Schedule to the Personal Data Protection Act 2012, any other personal data of the respective individual provided by that individual to the licensee; and
- (b) subject to section 22(7) read with the Sixth Schedule to the Personal Data Protection Act 2012, correct an error or omission in relation to the types of personal data set out in subparagraphs (a)(i) to (vi), provided the licensee is satisfied that there are reasonable grounds for such request.

[MAS Notice 626A (Amendment) 2022]

15.4 For the purposes of complying with this Notice, a licensee may, whether directly or through a third party, collect, use and disclose personal data of an individual customer, an individual appointed to act on behalf of a customer, an individual

connected party of a customer or an individual beneficial owner of a customer, without the respective individual's consent.

16 SUSPICIOUS TRANSACTIONS REPORTING

16.1 A licensee shall keep in mind the provisions in the CDSA¹⁵ and in the TSOFA that provide for the reporting to the authorities of transactions suspected of being connected with money laundering or terrorism financing and implement appropriate internal policies, procedures and controls for meeting its obligations under the law, including the following:

- (a) establish a single reference point within the organisation to whom all employees and officers are instructed to promptly refer all transactions suspected of being connected with money laundering or terrorism financing, for possible referral to STRO via STRs; and
- (b) keep records of all transactions referred to STRO, together with all internal findings and analysis done in relation to them.

16.2 A licensee shall promptly submit reports on suspicious transactions (including attempted transactions), regardless of the amount of the transaction, to STRO, and extend a copy to the Authority for information.

16.3 A licensee shall consider if the circumstances are suspicious so as to warrant the filing of an STR and document the basis for its determination, including where —

- (a) the licensee is for any reason unable to complete the measures as required by paragraphs 6, 7 and 8; or
- (b) the customer is reluctant, unable or unwilling to provide any information requested by the licensee, or decides to withdraw a pending application to establish business relations or a pending transaction, or to terminate existing business relations.

[MAS Notice 626A (Amendment) 2022]

16.4 Where a licensee forms a suspicion of money laundering or terrorism financing, and reasonably believes that performing any of the measures as required by paragraphs 6, 7 or 8 will tip-off a customer, a natural person appointed to act on behalf of the customer, a connected party of the customer or a beneficial owner of the customer, the licensee may stop performing those measures. The licensee shall document the basis for its assessment and file an STR.

16.5 For the purposes of paragraph 16, a reference to “transaction” shall include a

¹⁵ Please note in particular section 48 of the CDSA on tipping-off.

payment service transaction.

[MAS Notice 626A (Amendment) 2022]

17 INTERNAL POLICIES, COMPLIANCE, AUDIT AND TRAINING

17.1 A licensee shall develop and implement adequate internal policies, procedures and controls, taking into consideration its money laundering and terrorism financing risks and the size of its business, to help prevent money laundering and terrorism financing and communicate these to its employees.

17.2 The policies, procedures and controls shall meet all the requirements of this Notice.

[MAS Notice 626A (Amendment) 2022]

Compliance

17.3 A licensee shall develop appropriate compliance management arrangements, including at least, the appointment of an AML/CFT compliance officer at the management level.

17.4 A licensee shall ensure that the AML/CFT compliance officer, as well as any other persons appointed to assist the AML/CFT compliance officer, is suitably qualified, and has adequate resources and timely access to all customer records and other relevant information which the AML/CFT compliance officer requires to discharge the AML/CFT compliance officer's functions.

Audit

17.5 A licensee shall maintain an audit function that is adequately resourced and independent, and that is able to regularly assess the effectiveness of the licensee's internal policies, procedures and controls, and its compliance with regulatory requirements.

Employee Hiring

17.6 A licensee shall have in place screening procedures to ensure high standards when hiring employees and appointing officers.

Training

17.7 A licensee shall take all appropriate steps to ensure that its employees and officers (whether in Singapore or elsewhere) are regularly and appropriately trained on —

- (a) AML/CFT laws and regulations, and in particular, CDD measures, and detecting and reporting of suspicious transactions;

- (b) prevailing techniques, methods and trends in money laundering and terrorism financing; and
- (c) the licensee's internal AML/CFT policies, procedures and controls, and the roles and responsibilities of employees and officers in combating money laundering and terrorism financing.

[MAS Notice 626A (Amendment) 2022]

17.8 For the purposes of paragraph 17, a reference to "transaction" shall include a payment service transaction.

[MAS Notice 626A (Amendment) 2022]

Endnotes on History of Amendments

1. MAS Notice 626A (Amendment) 2015 with effect from 30 November 2015.
2. MAS Notice 626A (Amendment) 2021 with effect from 1 July 2021
3. MAS Notice 626A (Amendment) 2022 with effect from 1 March 2022.

Appendix 1

1. Financial institutions that are licensed, approved, registered (including a fund management company registered under paragraph 5(1)(i) of the Second Schedule to the Securities and Futures (Licensing and Conduct of Business) Regulations (Rg. 10)) or regulated by the Authority but does not include a person (other than a person referred to in paragraphs 2 and 3) who is exempted from licensing, approval or regulation by the Authority under any Act administered by the Authority, including a private trust company exempted from licensing under section 15 of the Trust Companies Act 2005 read with regulation 4 of the Trust Companies (Exemption) Regulations (Rg. 1).

[MAS Notice 626A (Amendment) 2021]

[MAS Notice 626A (Amendment) 2022]

2. Persons exempted under section 23(1)(f) of the Financial Advisers Act 2001 read with regulation 27(1)(d) of the Financial Advisers Regulations (Rg. 2).

[MAS Notice 626A (Amendment) 2022]

3. Persons exempted under section 99(1)(h) of the SFA read with paragraph 7(1)(b) of the Second Schedule to the Securities and Futures (Licensing and Conduct of Business) Regulations.

[MAS Notice 626A (Amendment) 2022]

Note: For the avoidance of doubt, the financial institutions set out in Appendix 2 fall within Appendix 1.

Appendix 2

1. Banks in Singapore licensed under the BA.

[MAS Notice 626A (Amendment) 2021]
[MAS Notice 626A (Amendment) 2022]

2. Merchant banks in Singapore licensed under the BA.

[MAS Notice 626A (Amendment) 2021]
[MAS Notice 626A (Amendment) 2022]

3. Finance companies licensed under section 6 of the Finance Companies Act 1967.

[MAS Notice 626A (Amendment) 2022]

4. Financial advisers licensed under section 6 of the Financial Advisers Act 2001 except those which only provide advice by issuing or promulgating research analyses or research reports, whether in electronic, print or other form, concerning any investment product.

[MAS Notice 626A (Amendment) 2022]

5. Holders of a capital markets services licence under section 82 of the SFA.

[MAS Notice 626A (Amendment) 2022]

6. Fund management companies registered under paragraph 5(1)(i) of the Second Schedule to the Securities and Futures (Licensing and Conduct of Business) Regulations (Rg. 10).

7. Persons exempted under section 23(1)(f) of the Financial Advisers Act 2001 read with regulation 27(1)(d) of the Financial Advisers Regulations (Rg. 2) except those which only provide advice by issuing or promulgating research analyses or research reports, whether in electronic, print or other form, concerning any investment product.

[MAS Notice 626A (Amendment) 2022]

8. Persons exempted under section 99(1)(h) of the SFA read with paragraph 7(1)(b) of the Second Schedule to the Securities and Futures (Licensing and Conduct of Business) Regulations.

[MAS Notice 626A (Amendment) 2022]

9. Approved trustees approved under section 289 of the SFA.

[MAS Notice 626A (Amendment) 2022]

10. Trust companies licensed under section 5 of the Trust Companies Act 2005.

[MAS Notice 626A (Amendment) 2022]

11. Direct life insurers licensed under section 8 of the Insurance Act 1966.

[MAS Notice 626A (Amendment) 2022]

12. Insurance brokers registered under the Insurance Act 1966 which, by virtue of such registration, are exempted under section 23(1)(c) of the Financial Advisers Act 2001 except those which only provide advice by issuing or promulgating research analyses or research reports, whether in electronic, print or other form, concerning any investment product.

[MAS Notice 626A (Amendment) 2022]