

PAYMENT SERVICES ACT 2019
(ACT 2 OF 2019)

PAYMENT SERVICES REGULATIONS

ATTESTATION (AGREED-UPON-PROCEDURE) BY AN EXTERNAL AUDITOR FOR ENTITIES THAT HAVE NOTIFIED MAS PURSUANT TO THE PAYMENT SERVICES (AMENDMENT) ACT 2021 (SAVING AND TRANSITIONAL PROVISIONS) REGULATIONS 2024

(Full name of applicant as per ACRA's record)

Explanatory Notes

1. This submission is required from all entities who have notified MAS pursuant to the Payment Services (Amendment) Act 2021 (Saving and Transitional Provisions) Regulations 2024 ("Transitional Regulations 2024").
2. The attestation should be completed by an external auditor who meets the minimum qualifications required as set out in the Transitional Regulations 2024.
3. This document should be submitted via FormSG. A copy (PDF) of this attestation form that has been filled in and signed off by the appointed External Auditor must be submitted. The link to the online form can be found [here](#). Late submissions and all other modes of submission will not be accepted.
4. All fields marked with an asterisk (*) are mandatory fields. If a question or field is not applicable, please check the "N.A." box or mark "N.A." in the space provided.

DEFINITIONS

For the purpose of this attestation form –

- a) “Notified entity” refers to an entity who has notified MAS pursuant to the Transitional Regulations 2024;
- b) “Phase 2 payment services” refers to any of the following payment service:
 - i. “previously unregulated domestic money transfer service” as defined in Paragraph 3(4) of the Transitional Regulations 2024;
 - ii. “previously unregulated cross-border money transfer service” as defined in Paragraph 4(4) of the Transitional Regulations 2024; or
 - iii. “previously unregulated digital payment token service” as defined in Paragraph 5(4) of the Transitional Regulations 2024;
- c) “Appointed day” means the date of commencement of the Payment Services (Amendment) Act 2021;
- d) “PS Act” refers to the Payment Services Act 2019;
- e) “PS Amendment Regs” refers to the Payment Services (Amendment) Regulations 2024;
- f) “MAS Notice PSN01” or “PSN01” refers to the MAS Notice PSN01 - Notice to Holders of Payment Services Licence (Specified Payment Services) on Prevention of Money Laundering and Countering the Financing of Terrorism published on 5 December 2019;
- g) “MAS Notice PSN02” or “PSN02” refers to the MAS Notice PSN02 - Notice to Holders of Payment Services Licence (Digital Payment Token Service) on Prevention of Money Laundering and Countering the Financing of Terrorism published on 5 December 2019;
- h) “Inspect” means to check the records or documents obtained from the applicant for possible lapses in controls which are not in line with regulatory requirements;
- i) “Review” means to inquire and analyse the records or documents in order to provide a reasonable analysis;
- j) “Payment Transactions” as defined in the PS Act, wherever applicable;
- k) “Customer” as defined in MAS Notice PSN01 and MAS Notice PSN02, wherever applicable;
- l) “CDD measures” or “customer due diligence measures” means the measures required by paragraph 7 of PSN01 and/ or paragraph 6 of PSN02, wherever applicable;
- m) “Product” as defined in MAS Notice PSN01 and MAS Notice PSN02, wherever applicable;
- n) “Relevant money” as defined in section 23 of the PS Act read with regulation 13A and 13B of the PS Amendment Regs;
- o) “Supporting documents” refer to records, data, and/or information, which includes both physical and electronic data;
- p) “Formalised” refers to a document that has been approved by the applicant’s senior management; and

- q) “Customer agreement forms” refers to contractual agreements with customers and customer onboarding forms.

SECTION 1: INFORMATION ON THE EXTERNAL AUDITOR

- 1.1 Provide the following information on the external auditor. *

Full name of partner conducting this AUP (as per ACRA’s record)	
Public accountant registration number (as per ACRA’s record)	
Full name of audit firm (as per ACRA’s record)	
Name of contact person	
Designation of contact person	
Email of contact person	

SECTION 2: ATTESTATION BY AN EXTERNAL AUDITOR – COMMENCEMENT OF BUSINESS

This section is applicable to **all Notified entities**. All sub-sections must be completed by an external auditor, unless otherwise stated. This section is to ascertain whether the notified entity had been providing the Phase 2 payment services that it has notified MAS for, prior to the appointed day.

- 2.1 Provide your attestation on the areas specified in this table. *

Yes	No	NA	
<input type="checkbox"/>	<input type="checkbox"/>		2.1.1 The applicant has onboarded customers ¹ for the purposes of carrying on its business of providing the Phase 2 payment services. This took place over the one year immediately before the appointed day. This has been verified against the relevant supporting documents, such as customer agreement forms.
<input type="checkbox"/>	<input type="checkbox"/>		2.1.2 The applicant has launched at least one product for the purposes of carrying on its business of providing the Phase 2 payment services prior to the appointed day. The product(s) was offered to customers, as at the appointed day. This has been verified against the relevant supporting documents, such as contractual agreements with customers.
<input type="checkbox"/>	<input type="checkbox"/>		2.1.3 The applicant has executed payment transactions ² which includes the provision of Phase 2 payment services. The transactions took place over the one year immediately before the appointed day. This has been

¹ This should only include genuine, non-fictitious accounts and exclude employees of the applicant.

² This refers to transactions undertaken with customers of the applicant. This excludes test/ trial transactions, as well as transactions done through an employee’s account.

			verified against the relevant supporting documents, such as invoices and receipts issued to customers.
<input type="checkbox"/>	<input type="checkbox"/>		2.1.4 The applicant has generated revenue from its business of providing the Phase 2 payment services. The revenue was earned over the one year immediately before the appointed day. This has been checked against the relevant supporting documents, such as financial statements and payment receipts issued to customers.
<input type="checkbox"/>	<input type="checkbox"/>		2.1.5 The applicant has incurred expenses for the purposes of carrying on its business of providing the Phase 2 payment services. The expenses were incurred over the one year immediately before the appointed day. This has been checked against the relevant supporting documents, such as financial statements, payment receipts from suppliers and/ or payslips for employee wages.

2.2 If you have indicated 'Yes' to any of the above in Section 2.1, please explain why. Otherwise, please indicate nil. *

Subsection that was indicated as 'Yes'	Reason

2.3 If you have indicated 'No' to any of the above in Section 2.1, please explain why. Otherwise, please indicate nil. *

Subsection that was indicated as 'No'	Reason

2.4 If there are any material observation(s) that has come to your attention in the course of your procedures, please elaborate below. Otherwise, please indicate nil. *

Remarks

2.5 Set out any additional information that is relevant, if any. Otherwise, please indicate nil. *

Remarks

SECTION 3: ATTESTATION BY AN EXTERNAL AUDITOR – AML/CFT CONTROLS

This section is applicable to **all Notified entities**. All sub-sections must be completed by an external auditor, unless otherwise stated. This section is to ascertain whether the Notified entity has in place policies and procedures to effectively manage and mitigate the anti-money laundering and countering the financing of terrorism (“AML/CFT”) risks. The references to PSN01, PSN02 and/ or other provisions are meant for guidance and do not currently apply to the notified entity.

3.1 Provide your attestation on the areas specified in this table. The attestation should be conducted based on a review of the applicant’s latest policies, procedures, controls and systems/ policies, procedures, controls and systems within the 12-month period immediately after the appointed day. *

Yes	No	NA		Applicable PSN01 ³ / PSN02 ⁴ / other provisions
			<i>Governance structure</i>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.1 The applicant has a reporting arrangement to the board of directors and senior management, for the purpose of ensuring oversight and resolution of AML/CFT issues that may arise. This could include, but is not limited to, clear reporting lines and the submission of reports on a timely basis.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.2 The applicant has clearly set out the escalation process, to the board of directors and senior management, for the purpose of ensuring oversight and resolution of AML/CFT issues that may arise. This could include but is not limited to escalation channels, the specific thresholds for escalation and the identification of issues for escalation.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.3 The applicant has appointed an AML/CFT compliance officer.	PSN01 Paragraph 19.3, PSN02 Paragraph 17.3
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.4 The applicant has an independent internal and/ or external audit arrangement.	PSN01 Paragraph 19.5, PSN02 Paragraph 17.5

³ Applicable to entities who have notified MAS for domestic money transfer services or cross-border money transfer services.

⁴ Applicable to entities who have notified MAS for digital payment token services.

			<i>Policies and procedures</i>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.5 The applicant has developed formalised policies, procedures, and controls to help prevent money laundering and terrorism financing.	PSN01 Paragraph 19.1, PSN02 Paragraph 17.1
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.6 The applicant has developed a formalised Enterprise-wide Risk Assessment (“EWRA”) policy and procedure.	PSN01 Paragraph 5, PSN02 Paragraph 4
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.7 The applicant’s EWRA policy sets out the methodology to assess the inherent risk, effectiveness of controls and residual risk of the company.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.8 The applicant’s EWRA methodology comprises of qualitative and quantitative factors.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.9 The applicant’s EWRA framework includes assessing the areas of customer risk, geographical risk ⁵ , products, services, transactions, and delivery channel risk.	PSN01 Paragraph 5.1, PSN02 Paragraph 4.1
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.10 The applicant has developed AML/CFT policies, procedures and controls for the category of new products, practices and technologies (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 6, PSN02 Paragraph 5
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.11 The applicant has developed AML/CFT policies, procedures and controls for the category of sanctions-related due diligence (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable) including the UN Security Council Resolutions (“UNSCRs”) lists, latest domestic sanctions and restrictions against Russia).	PSN01 Paragraph 7.51, PSN02 Paragraph 6.49, Targeted Financial Sanctions ⁶
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.12 The applicant has developed AML/CFT policies, procedures and controls for the category of customer due diligence (“CDD”) (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 7, PSN02 Paragraph 6
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.13 Based on a review of the applicant’s policies and procedures regarding CDD, the documents meet the following requirement.	PSN01 Paragraph 7.5, 7.6, 7.7, 7.8, 7.10(a), and 7.14, PSN02 Paragraph

⁵ This refers to countries or jurisdictions that the applicant’s customers are from, and countries or jurisdictions that the applicant has operations in.

⁶ This includes:

1. Notice SNR-N01 Financial Measures in Relation to Russia
2. Notice SNR-N02 Financial Measures in Relation to Russia – Non-prohibited Payments and Transactions
3. Financial Services and Markets Act 2022 and Financial Services and Markets Regulations 2023 as listed on [the Authority’s website](#)
4. Terrorism (Suppression of Financing) Act 2002

			<p>For each of the following persons identified by the applicant (where applicable):</p> <ul style="list-style-type: none"> a) each customer; b) all natural person(s) appointed to act on the customer's behalf; c) all connected parties of the customer where the customer is a legal person or legal arrangement; and d) all natural person(s) having executive authority in the legal person, and/or the settlors, trustees, protectors, beneficiaries, and any natural person(s) of the legal arrangement as described in Paragraph 7.14 of MAS Notice PSN01 and/ or Paragraph 6.14 of MAS Notice PSN02, <p>under circumstances where the exception in Paragraph 7.12 of MAS Notice PSN01 and/ or Paragraph 6.12 of MAS Notice PSN02 does not apply, the applicant will obtain and document the following information:</p> <ul style="list-style-type: none"> a) Full name, including any aliases; b) Unique identification number; c) Residential address, registered or business address (as may be appropriate); d) Date of birth, establishment, incorporation or registration (as may be appropriate); e) Nationality or place of incorporation or registration (as may be appropriate); and f) Where the customer is a legal person or legal arrangement, the legal form, constitution and powers that regulate and bind the legal person or legal arrangement. 	6.5, 6.6, 6.7, 6.8, 6.10(a) and 6.14
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.14 The applicant's policies and procedures regarding CDD includes a customer risk assessment framework to determine the risk-rating of the customer.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.15 Based on a review of the applicant's policies and procedures regarding CDD, the documents meet the following requirement.</p> <p>For each of the following persons identified by the applicant (where applicable):</p> <ul style="list-style-type: none"> a) each customer; b) all natural person(s) appointed to act on the customer's behalf; 	PSN01 Paragraph 7.9, PSN02 Paragraph 6.9

		<p>c) all connected parties of the customer where the customer is a legal person or legal arrangement; and</p> <p>d) all natural person(s) having executive authority in the legal person, and/or the settlors, trustees, protectors, beneficiaries, and any natural person(s) of the legal arrangement as described in Paragraph 7.14 of MAS Notice PSN01 and/ or Paragraph 6.14 of MAS Notice PSN02,</p> <p>under circumstances where the exception in Paragraph 7.12 of MAS Notice PSN01 and/ or Paragraph 6.12 of MAS Notice PSN02 does not apply, the applicant will:</p> <p>a) verify the identities of these persons using reliable, independent sources (e.g., identity card/passport for individuals/MyInfo, and certificate of incorporation/ board resolutions for corporations);</p> <p>b) verify the legal form, proof of existence, constitution and powers that regulate and bind the customer, using reliable/ independent source data, documents or information, where the customer is a legal person or legal arrangement;</p> <p>c) retain copies of the reference documents used to verify the identities of these persons.</p>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.16 Based on a review of the applicant's policies and procedures regarding CDD, the documents meet the following requirement.</p> <p>Under circumstances where the exception in Paragraph 7.12 of MAS Notice PSN01 and/ or Paragraph 6.12 of MAS Notice PSN02 does not apply, where there is a natural person(s) appointed to act on behalf of the customer, the applicant will verify the authority of the natural person(s) by obtaining:</p> <p>a) appropriate documentary evidence authorising the appointment of such natural person by the customer to act on his or its behalf; and</p> <p>b) the specimen signature of each natural person appointed.</p>	<p>PSN01 Paragraph 7.9, PSN02 Paragraph 6.9</p>

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.17 Based on a review of the applicant’s policies and procedures regarding CDD, the documents meet the following requirement.</p> <p>Under circumstances where the exception in Paragraph 7.12 of MAS Notice PSN01 and/ or Paragraph 6.12 of MAS Notice PSN02 does not apply, where the customer is a legal person or legal arrangement, the applicant will:</p> <p>a) verify the legal form, proof of existence, constitution and powers that regulate and bind the customer, using reliable, independent source data, documents or information; and/or</p> <p>b) retain copies of the reference documents used to verify the identities of these customers.</p>	PSN01 Paragraph 7.11, PSN02 Paragraph 6.11
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.18 Based on a review of the applicant’s policies and procedures regarding CDD, the applicant will:</p> <p>a) inquire if there exist any beneficial owner in relation to a customer;</p> <p>b) identify the beneficial owners and take reasonable measures to verify the identities of the beneficial owners using relevant information or data obtained from reliable, independent sources, where there is one or more beneficial owners in relation to a customer;</p> <p>c) understand the nature of the customer's business and its ownership and control structure, where the customer is not a natural person; or</p> <p>d) document the basis for its determination that the inquiry if there exists any beneficial owner in relation to a customer is not required.</p>	PSN01 Paragraph 7.13, 7.14, 7.15, 7.17, PSN02 Paragraph 6.13. 6.14, 6.15, 6.17
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.19 Based on a review of the applicant’s policies and procedures regarding CDD, the applicant will not commence or continue business relations with any customers or undertake any transactions for any customers if its CDD measures cannot be completed.</p>	PSN01 Paragraph 7.46 read with 7.48, PSN02 Paragraph 6.45, read with 6.47
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.20 The applicant conducts non-face-to-face business relations with customers or undertakes non-face-to-face transactions without an account being opened for a customer (“non-face-to-face business contact”).</p>	PSN01 Paragraph 7.34, PSN02 Paragraph 6.34
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.21 <i>[Applicable if ‘Yes’ to 3.1.20, otherwise tick NA]</i> Based on a review of the applicant’s policies and procedures regarding CDD, the applicant has put in</p>	PSN01 Paragraph 7.34, 7.35, 7.36,

			place measures ⁷ to address specific risks associated with non-face-to-face business contact.	PSN02 Paragraph 6.34, 6.35, 6.36
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.22 The applicant carries out simplified customer due diligence (“SCDD”).	PSN01 Paragraph 8, PSN02 Paragraph 7
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.23 <i>[Applicable if ‘Yes’ to 3.1.22’, otherwise tick NA]</i> The applicant has developed AML/CFT policies, procedures and controls for the category of SCDD (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 8, PSN02 Paragraph 7
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.24 <i>[Applicable if ‘Yes’ to 3.1.22’, otherwise tick NA]</i> Based on a review of the applicant’s policies and procedures regarding SCDD, the applicant will not perform SCDD measures on any customer under the following circumstances: a) where one or more transactions undertaken, whether in the course of business relations or otherwise, by the payment service provider for a customer (other than transactions undertaken by the payment service provider to transfer funds from the customer’s payment account directly to that customer’s bank account) in any one-year period cumulatively exceeds S\$20,000; b) 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; c) 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 payment service provider for itself, or notified to payment service providers generally by the Authority, or other foreign regulatory authorities; or d) where the payment service provider suspects that money laundering or terrorism financing is involved.	PSN01 Paragraph 8.4, PSN02 Paragraph 7.4
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.25 The applicant has developed AML/CFT policies, procedures and controls for the category of enhanced customer due diligence (“ECDD”) (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 9, PSN02 Paragraph 8

⁷ Refer to the Guidelines to MAS Notice PSN01 Paragraph 7-12-3 for a non-exhaustive list of examples.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <p>3.1.26 Based on a review of the applicant’s policies and procedures regarding ECDD, the applicant has internal risk management systems, policies, procedures and controls (“SPPCs”) to determine if:</p> <ul style="list-style-type: none"> a) 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 (collectively, “relevant persons”) is a politically exposed person (“PEP”), or a family member or close associate of a PEP; and b) business relations with or transactions (except for specified money-changing transactions) undertaken without an account being opened for any customer presented a higher risk for money laundering or terrorism financing (“ML or TF”). <p>Circumstances where a customer presents or may present a higher risk for ML or TF include but are not limited to the following:</p> <ul style="list-style-type: none"> 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 payment service provider shall treat any business relations with or transactions (except for specified money-changing transactions) for any such customer as presenting a higher risk for 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 payment service provider for itself, or notified to payment service providers generally by the Authority or other foreign regulatory authorities, the payment service provider 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 payment service provider is notable to establish if it has any – <ul style="list-style-type: none"> i. ongoing, apparent or visible operation or business activity; ii. economic or business purpose for its corporate structure or arrangement; or 	PSN01 Paragraph 9.2, 9.6, 9.7, PSN02 Paragraph 8.2, 8.5, 8.6
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			iii. substantive financial activity in its interactions with the payment service provider, the payment service provider shall assess whether any such customer presents a higher risk for money laundering or terrorism.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.27 Based on a review of the applicant's policies and procedures regarding ECDD, the applicant will not establish or continue business relations, or undertake transactions without senior management's prior approval, where a customer or any beneficial owner of the customer is determined by the applicant to be a PEP, or a family member or close associate of a PEP.	PSN01 Paragraph 9.3(a), PSN02 Paragraph 8.3(a)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.28 Based on a review of the applicant's policies and procedures regarding ECDD, the applicant will carry out ECDD on any customer where: a) a customer or any beneficial owner of the customer is determined by the applicant to present a higher risk for ML/TF; or b) the Authority or other relevant authorities in Singapore notify to the applicant as presenting a higher risk for ML/TF.	PSN01 Paragraph 9.6, 9.7(b), 9.8, PSN02 Paragraph 8.5, 8.6(b), 8.7
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.29 Based on a review of the applicant's policies and procedures regarding ECDD, the applicant will establish the source of wealth ("SOW") and source of funds ("SOF") of any customer and beneficial owner of the customer, where a customer or any beneficial owner of the customer is determined by the applicant to be a PEP, or a family member or close associate of a PEP.	PSN01 Paragraph 9.3(b), PSN02 Paragraph 8.3(b)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.30 The applicant has developed AML/CFT policies, procedures and controls for the category of screening (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 7.51 to 7.54, PSN02 Paragraph 6.49 to 6.52
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.31 Based on a review of the applicant's policies and procedures regarding screening, the applicant will perform screening on the following parties: a) customers; b) natural persons appointed to act on behalf of the customer; c) beneficial owners of the customer; d) [For domestic money transfer and cross-border money transfer services] all wire transfer originators and wire transfer beneficiaries as defined in paragraph 15 of MAS Notice PSN01; and	PSN01 Paragraph 7.51, 7.53, PSN02 Paragraph 6.49, 6.51

			<p>e) [For digital payment token service] all value transfer originators and value transfer beneficiaries as defined in paragraph 13 of MAS Notice PSN01,</p> <p>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 (including the UNSCRs lists, MAS investor alert list, latest domestic sanctions and restrictions against Russia).</p>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.32 The applicant's AML/CFT policies and procedures includes performing screening when, or as soon as practicable after, the applicant establishes business relations with the customer.</p>	<p>PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.33 <i>[For cross-border money transfer service only]</i> The applicant's AML/CFT policies and procedures includes performing screening before the applicant effects or receives any funds by cross-border wire transfer, and before the applicant undertakes any transaction for the purpose of providing cross-border money transfer service.</p>	<p>PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.34 <i>[For cross-border money transfer service only]</i> The applicant's AML/CFT policies and procedures includes performing screening before the applicant effects or receives any funds by cross-border wire transfer, and before the applicant undertakes any transaction for the purpose of providing cross-border money transfer service.</p>	<p>PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53</p>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.35 <i>[For domestic money transfer and cross-border money transfer services]</i> The applicant's AML/CFT policies and procedures includes performing screening before the applicant undertakes any transaction (except for a specified money-changing transaction where the money is funded from an identifiable source) of a value exceeding S\$5,000 for a customer who has not otherwise established business relations with the applicant.</p>	<p>PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53</p>

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.36 [For digital payment token service] The applicant's AML/CFT policies and procedures includes performing screening before the applicant effects or receives digital payment tokens by value transfer, for a customer who has not otherwise established business relations with the applicant.	PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.37 The applicant's AML/CFT policies and procedures includes performing screening on a periodic basis ⁸ after the applicant establishes business relations with the customer.	PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.38 The applicant's AML/CFT policies and procedures includes performing screening when there are any changes or updates to – a) the lists and information provided by the Authority of other relevant authorities in Singapore to the applicant and b) the natural persons appointed to act on behalf of a customer, connected parties of a customer or beneficial owners of a customer.	PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.51 read with 6.52, 6.53
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.39 The applicant uses an automated system to perform its screening as specified in Sections 3.1.29 and 3.1.30 of this attestation form.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.40 The applicant has developed AML/CFT policies, procedures and controls for the category of ongoing monitoring (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 7.26 to 7.33, PSN02 Paragraph 6.25 to 6.33
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.41 Based on a review of the applicant's ongoing monitoring policies and procedures, the applicant will review customer identification information on a periodic basis or upon the occurrence of a trigger event, whichever is earlier.	PSN01 Paragraph 7.31, 7.3(e) and PSN01 Guidelines Paragraph 7-11-4, 7-11-5, 7-11-6, PSN02 Paragraph 6.31, 6.3(e) and PSN02 Guidelines Paragraph 6-11-4, 6-11-5, 6-11-6
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.42 Based on a review of the applicant's ongoing monitoring policies and procedures, the applicant will review customer identification information on an annual basis or upon the occurrence of a trigger event, whichever is earlier, for customers who have	PSN01 Paragraph 7.31, 7.3(e) and PSN01 Guidelines Paragraph 7-11-4, 7-11-5, 7-11-6, PSN02 Paragraph

⁸ As defined by the applicant.

			been assessed by the applicant as posing higher ML/TF risks.	6.31, 6.3(e) and PSN02 Guidelines Paragraph 6-11-4, 6-11-5, 6-11-6
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.43 Based on a review of the applicant's ongoing monitoring policies and procedures, if the applicant retains a customer when there are any reasonable grounds for suspicion that existing business relations with the customer are connected with money laundering or terrorism financing, the applicant will: a) substantiate and document the reasons for retaining the customer; b) subject the customer's business relations to commensurate risk mitigation measures, including enhanced ongoing monitoring; and obtain senior management approval to retain the customer.	PSN01 Paragraph 7.32, 7.33, PSN02 Paragraph 6.32, 6.33
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.44 Based on a review of the applicant's ongoing monitoring policies and procedures, the applicant has identified red flags/ parameters to monitor all its transactions. The parameters take into account the customer's ML/TF risk profile and transaction characteristics ⁹ .	PSN01 Guidelines Paragraph 7-11-12, 7-11-13, PSN02 Guidelines Paragraph 6-11-12, 6-11-13
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.45 Based on a review of the applicant's ongoing monitoring policies and procedures, the applicant has a process to: a) pay special attention to all complex, unusually large or unusual patterns of transactions (based on red flags/parameters as identified by the applicant), undertaken throughout the course of business relations, that have no apparent or visible economic or lawful purpose; b) inquire into the background and purpose of the transactions in paragraph 7.28 of MAS Notice PSN01 and document its findings with a view to making this information available to the relevant authorities should the need arise; and c) retain documentation evidencing any reviews or investigations.	PSN01 Paragraph 7.28, 7.30, PSN02 Paragraph 6.28, 6.30
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.46 The applicant uses an automated system to perform its transaction monitoring.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.47 The applicant uses manual spreadsheets to perform its transaction monitoring.	-

⁹ Refer to the Guidelines to MAS Notice PSN01 Paragraph 7-11-7 for a non-exhaustive list of examples.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.48 The applicant has developed AML/CFT policies, procedures and controls for the category of issuance of bearer negotiable instruments and restriction of cash payout (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 11, PSN02 Paragraph 10
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.49 The applicant has developed AML/CFT policies, procedures and controls for the category of reliance on third parties (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 12, PSN02 Paragraph 11
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.50 The applicant has developed AML/CFT policies, procedures and controls for the category of correspondent accounts (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 13, PSN02 Paragraph 12
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.51 The applicant has developed AML/CFT policies, procedures and controls for the category of agency arrangement (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 14, PSN02 Paragraph 13
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.52 <i>[For domestic money transfer or cross-border money transfer services]</i> The applicant has developed AML/CFT policies, procedures and controls for the category of wire transfer (as set out in MAS Notice PSN01).	PSN01 Paragraph 15
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.53 <i>[For domestic money transfer or cross-border money transfer services]</i> Based on a review of the applicant's wire transfer policies and procedures, the applicant has identified the applicant's role ¹⁰ and responsibilities for the wire transfers that it executes.	PSN01 Paragraph 15
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.54 <i>[For DPT service only]</i> The applicant has developed AML/CFT policies, procedures and controls for the category of value transfer (as set out in MAS Notice PSN02).	PSN02 Paragraph 13
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.55 <i>[For DPT service only]</i> Based on a review of the applicant's value transfer policies and procedures, the applicant has identified the applicant's role ¹¹ and responsibilities for the value transfers that it executes.	PSN02 Paragraph 13

¹⁰ A wire transfer originator, ordering institution, wire transfer beneficiary, beneficiary institution or intermediary institution as defined in Paragraph 15 of MAS Notice PSN01.

¹¹ A value transfer originator, ordering institution, value transfer beneficiary, beneficiary institution or intermediary institution as defined in Paragraph 13 of MAS Notice PSN02.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.56 [For DPT service only] The applicant has a travel rule compliance system in place to transmit and receive the value transfer information.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.57 [For DPT service only] The applicant receives/transfers digital payment tokens from/ to self-hosted wallets.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.58 [For DPT service only] The applicant receives/transfers digital payment tokens from/ to unregulated wallets.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.59 [For DPT service only, applicable if 'Yes' to 3.1.57 and/ or 3.1.58, otherwise tick 'NA'] The applicant's AML/CFT policies and procedures includes measures for customers to demonstrate control over the DPT wallet address.	PSN02 Paragraph 6.27, PSN02 Guidelines Paragraph 13-7(a)(i)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.60 [For DPT service only] The applicant has an automated system in place to perform screening of wallet addresses.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.61 The applicant has developed AML/CFT policies, procedures and controls for the category of suspicious transactions reporting ("STR") (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 18, PSN02 Paragraph 16
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.62 Based on a review of the applicant's STR policies and procedures, the applicant: a) has established 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) will keep records of all transactions referred to STRO, together with all internal findings and analysis done in relation to them.	PSN01 Paragraph 18.1, PSN02 Paragraph 16.1
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.63 Based on a review of the applicant's STR policies and procedures, the applicant will 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.	PSN01 Paragraph 18.2, PSN02 Paragraph 16.2
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.64 Based on a review of the applicant's STR policies and procedures, where circumstances are suspicious to warrant the filing of an STR, the applicant will submit the report to STRO within 15 business days (at latest) of the case being referred by the relevant employee or officer, unless the circumstances are exceptional or extraordinary.	PSN01 Paragraph 18.3, Guidelines to PSN01 Paragraph 18-1, PSN02 Paragraph 16.3, Guidelines to PSN02 Paragraph 16-1

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.65 The applicant has developed AML/CFT policies, procedures and controls for the category of record keeping (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 16, PSN02 Paragraph 14
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.66 The applicant's record keeping policies and procedures includes retaining records for: a) CDD information relating to the business relations, wire transfers, transactions undertaken without an account being opened (except for specified money-changing transactions), 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 or transactions, and b) data, documents and information relating to a transaction, including any information needed to explain and reconstruct the transaction, a period of at least 5 years following the completion of the transaction.	PSN01 Paragraph 16.3, PSN02 Paragraph 14.3
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.67 The applicant has developed AML/CFT policies, procedures and controls for the category of employee hiring and training (as set out in MAS Notice PSN01 and/ or MAS Notice PSN02, where applicable).	PSN01 Paragraph 19.6 and 19.7, PSN02 Paragraph 17.6 and 17.7
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.68 The applicant has an outsourcing arrangement in place.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.69 [Applicable if 'Yes' to 3.1.68, otherwise tick 'NA'] The applicant has an outsourcing policy and register.	MAS Guidelines on Outsourcing
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.70 The applicant has partners. This includes liquidity and payment partners.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.71 [Applicable if 'Yes' to 3.1.70, otherwise tick 'NA'] The applicant has a partner due diligence policy and procedure in place.	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.72 The applicant is a parent entity of at least one subsidiary or branch. .	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.73 [Applicable if 'Yes' to 3.1.72, otherwise tick 'NA'] The applicant has a group-wide AML/CFT policy and procedure, which includes sharing information required for the purposes of CDD, and ML/TF risk management within the group.	PSN01 Paragraph 19.2A, PSN02 Paragraph 17.2A
			<i>Sampling – CDD</i>	

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.74 Collate the applicant's complete list of account opening transactions that took place between the 6-month to 9-month period immediately after the appointed day.</p> <p>Select a random Sample A¹² of these transactions. Where possible, Sample A should include a fair distribution of natural persons, legal persons, or legal arrangements, with or without an account being opened.</p> <p>From a review of Sample A, there are no anonymous accounts, accounts in a fictitious name or potential accounts that could be anonymous or fictitious, that has been identified.</p>	PSN01 Paragraph 7.1, PSN02 Paragraph 6.1
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.75 From inspection of Sample A, there has been no instances where the applicant failed to perform CDD measures when:</p> <p>a) the applicant established business relations with any customer;</p> <p>b) the applicant effects or receives any funds by cross-border wire transfer, for any customer who has not otherwise established business relations with the payment service provider;</p> <p>c) the applicant 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 payment service provider;</p> <p>d) the applicant undertakes any transaction (except for a specified money-changing transaction where the money is funded from an identifiable source) of a value exceeding S\$5,000 for any customer who has not otherwise established business relations with the applicant;</p> <p>e) there is a suspicion of money laundering or terrorism financing; and</p> <p>f) the applicant has doubts about the veracity or adequacy of any information previously obtained.</p> <p>In the case where the customer is a Singapore Government entity, the applicant shall only be required to obtain CDD information and/or business relation documents as may be required to confirm</p>	PSN01 Paragraph 7.3, 7.12, PSN02 Paragraph 6.3, 6.12

¹² The sample size selected should be commensurate with the nature, scale, complexity of the notified entity.

			that that the customer is a Singapore Government entity.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.76 In respect of Sample A, for each of the following persons identified by the applicant (where applicable):</p> <ol style="list-style-type: none"> each customer; all natural person(s) appointed to act on the customer's behalf; all connected parties of the customer where the customer is a legal person or legal arrangement; and all natural person(s) having executive authority in the legal person, and/or the settlors, trustees, protectors, beneficiaries, and any natural person(s) of the legal arrangement as described in paragraph 7.14 of MAS Notice PSN01, <p>Under circumstances where the exception in paragraph 7.12 of MAS Notice PSN01 does not apply, report any instances where any of the following information was not obtained or recorded/documentated by the applicant:</p> <ol style="list-style-type: none"> Full name, including any aliases; Unique identification number; Residential address, registered or business address (as may be appropriate); Date of birth, establishment, incorporation or registration (as may be appropriate); Nationality or place of incorporation or registration (as may be appropriate); and Where the customer is a legal person or legal arrangement, the legal form, constitution and powers that regulate and bind the legal person or legal arrangement. 	PSN01 Paragraph 7.5, 7.6, 7.7, 7.8, 7.10(a) and 7.14, PSN02 Paragraph 6.5, 6.6, 6.7, 6.8, 6.10(a) and 6.14
			<i>Sampling – Screening</i>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>3.1.77 From inspection of Sample A, the applicant has performed screening on the following relevant parties:</p> <ol style="list-style-type: none"> a customer; natural persons appointed to act on behalf of the customer (if any); connected parties of the customer (if any); beneficial owners of the customer (if any); all wire transfer originators and wire transfer beneficiaries as defined in Paragraph 15 of MAS Notice PSN01; and 	PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.49 read with 6.50, 6.51

		<p>f) all value transfer originators and value transfer beneficiaries as defined in Paragraph 13 of MAS Notice PSN02,</p> <p>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 (including the UN Security Council Resolutions UNSCRs lists, MAS investor alert list, latest domestic sanctions and restrictions against Russia).</p>	
<input type="checkbox"/>	<input type="checkbox"/>	<p><input type="checkbox"/> 3.1.78 From inspection of Sample A, the applicant has performed screening on the relevant parties mentioned in Section 3.1.66 of this attestation form:</p> <p>a) when, or as soon as practicable after, the applicant establishes business relations with the customer;</p> <p>b) <i>[For cross-border money transfer service only]</i> before the applicant effects or receives any funds by cross-border wire transfer, and before the applicant undertakes any transaction for the purpose of providing cross-border money transfer service;</p> <p>c) <i>[For cross-border money transfer service only]</i> before the applicant undertakes any transaction for the purposes of carrying on its business of providing cross-border money transfer service, if the applicant has not established business relations with the customer;</p> <p>d) <i>[For domestic money transfer and cross-border money transfer services]</i> before the applicant undertakes any transaction (except for a specified money-changing transaction where the money is funded from an identifiable source) of a value exceeding S\$5,000 for a customer who has not otherwise established business relations with the applicant;</p> <p>e) <i>[For digital payment token service]</i> before the applicant effects or receives digital payment tokens by value transfer, for a customers who has not otherwise established business relations with the applicant;</p>	<p>PSN01 Paragraph 7.51 read with 7.52, 7.53, PSN02 Paragraph 6.49 read with 6.50, 6.51</p>

			f) on a periodic basis ¹³ after the applicant establishes business relations with the customer; and g) when there are any changes or updates to – <ul style="list-style-type: none"> i. the lists and information provided by the Authority of other relevant authorities in Singapore to the applicant and ii. the natural persons appointed to act on behalf of a customer, connected parties of a customer or beneficial owners of a customer. 	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3.1.79 From inspection of Sample A, the applicant has documented the results of the screening and assessment.	PSN01 Paragraph 7.54, PSN02 Paragraph 6.52

3.2 If you have indicated 'Yes' to any of the above in Section 3.1, please explain why. Otherwise, please indicate nil. *

Subsection that was indicated as 'Yes'	Reason

3.3 If you have indicated 'No' to any of the above in Section 3.1, please explain why. Where relevant, specify the details/facts relating to the instance, including the basis for your determination of the incomplete documents on policies, operational procedures, and controls. If applicable, please also indicate the specific requirement in MAS Notice PSN01 and/ or MAS Notice PSN02 that the applicant has failed to meet. Otherwise, please indicate nil. *

Subsection that was indicated as 'No'	Reason

3.4 If you have indicated 'NA' to any of the above in Section 3.1, please explain why. If you have indicated 'NA' as it has been instructed in Section 3.1, please indicate nil. *

Subsection that was indicated as 'NA'	Reason

¹³ As defined by the applicant.

3.5 If there are any material observation(s) that has come to your attention in the course of your procedures, please elaborate below. Otherwise, please indicate nil. *

Remarks

3.5 Set out any additional information that is relevant, if any. Otherwise, please indicate nil. *

Remarks

SECTION 4: Attestation by an external auditor – segregation and custody of customers’ assets for entities providing DPT services

This section is only applicable to notified entities for the previously unregulated digital payment token services. All sub-sections must be completed by an external auditor, unless otherwise stated. This section is to ascertain whether the notified entity has in place policies and procedures in relation to segregation and custody of customers’ assets. The references to the regulations or other provisions are meant for reference and the requirements do not currently apply to the notified entities.

4.2 Provide your attestation on the areas specified in this table.*

Yes	No	NA		Applicable PS Amendment Regs/ Consumer Protection Safeguard Guidelines ¹⁴
			<i>Safeguarding of money received from customer</i>	
<input type="checkbox"/>	<input type="checkbox"/>		4.1.1 The applicant holds money on behalf of its customer.	-
			<i>[If ‘Yes’ to 4.1.1, proceed to complete “4.1.2 to 4.1.3” below. If ‘No’ to 4.1.1, tick ‘NA’ for “4.1.2 to 4.1.3”.]</i>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	4.1.2 Based on a review of the applicant’s policies and procedures, the documents meet the following requirement.	PS Amendment Regs18B

¹⁴ Refers to the ‘Guidelines on Provision of Consumer Protection Safeguards by DPTSPs’

			<p>The applicant ensures that any money received from, or on account of, a customer in respect of the provision of a digital payment token service (“relevant money”) is safeguarded no later than the next business day after any relevant money is received, and in one of the following manners:</p> <p>a) by an undertaking, from a safeguarding person, to be fully liable to the customer for the relevant money;</p> <p>b) by a guarantee given by a safeguarding person for the amount of the relevant money; or</p> <p>c) by depositing the relevant money in a trust account¹⁵ maintained with a safeguarding person.</p>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.3 [Applicable if ‘Yes’ to 4.1.2 and applicant uses 4.1.2(c), a trust account. Otherwise, tick ‘NA’.]</p> <p>Based on a review of the applicant’s policies and procedures, the documents meet the following requirement.</p> <p>The applicant does not commingle the relevant money with other moneys, except that the digital payment token service provider may –</p> <p>a) deposit the relevant money of a customer in a trust account together with, and commingled with, the relevant money received from its other customers;</p> <p>b) advance money to the trust account from its own money to open the trust account; or</p> <p>c) from time to time, advance money to the trust account from its own money to maintain the trust account.</p>	PS Amendment Regs 16(2)
			<i>Safeguarding of customers’ assets¹⁶</i>	
<input type="checkbox"/>	<input type="checkbox"/>		4.1.4 The applicant holds assets belonging to its customer on behalf of its customer.	-

¹⁵ The account must be designated as a trust account, a customer’s account or customers’ account, and be distinguished and maintained separately from any other accounts in which the DPTSP deposits its own assets.

¹⁶ Customers’ assets refer to any assets (including digital payment tokens) belonging to customers held by the digital payment token service provider, **except money**.

			<i>[If 'Yes' to 4.1.4, proceed to complete "4.1.5 to 4.1.31" below. If 'No' to 4.1.4, tick 'NA' for "4.1.5 to 4.1.31".]</i>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.5 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>By no later than the next business day after any assets belonging to a customer are received from, or on account of, the customer, the assets are –</p> <p>a) deposited in a trust account maintained by the applicant or with a safeguarding person; or</p> <p>b) returned to the customer.</p>	PS Amendment Regs 18B
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.6 Based on a review of the applicant's policies and procedures, bookkeeping records as well as customer agreement forms, the documents meet the following requirement.</p> <p>All assets received from, or on account of, a customer are treated and dealt as belonging to the customer¹⁷.</p>	PS Amendment Regs 18C(1)(b) read with 18C(1)(c)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.7 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>Customers' assets deposited in a trust account (as referred to in PS Regs 18B(1)(a)) –</p> <p>a) cannot be used for the payment of the debts of the applicant; and</p> <p>b) are not liable to be taken under or pursuant to an enforcement order or a process of any court.</p>	PS Amendment Regs 18B(2)
<input type="checkbox"/>	<input type="checkbox"/>		4.1.8 The applicant intends to maintain the trust account for safeguarding customers' assets by itself.	-
<input type="checkbox"/>	<input type="checkbox"/>		4.1.9 The applicant intends to maintain the trust account for safeguarding customers' assets by engaging the services of another person ("safeguarding person" ¹⁸).	-

¹⁷ This includes instances where customers' assets have been received but have not been deposited into the trust account yet.

¹⁸ As referred to in Paragraph 4.2.2 of the Guidelines on Provision of Consumer Protection Safeguards by DPTSPs.

			<p><i>[If 'Yes' to 4.1.8 only, proceed to complete "4.1.10 and 4.1.16 to 4.1.31 below. Tick 'NA' for 4.1.11 to 4.1.15.]</i></p> <p><i>If 'Yes' to 4.1.9 only, proceed to complete 4.1.11 to 4.1.31 below. Tick 'NA' for 4.1.10.</i></p> <p><i>If 'Yes' to both 4.1.8 and 4.1.9, proceed to complete 4.1.10 to 4.1.31 below.]</i></p>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.10 <i>[Applicable if 'Yes' to 4.1.8, otherwise tick 'NA']</i> Based on a review of the applicant's policies and procedures, as well as customer agreement forms, the documents meet the following requirement.</p> <p>Before depositing any assets belonging to a customer in the trust account, the applicant has disclosed in writing to its customer the terms and conditions that would apply to the applicant's safeguarding of the assets.</p>	PS Amendment Regs 18E and Guidelines Para 3.6.1 (a) to (b), 3.6.1 (e) to (g), 3.6.2
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.11 <i>[Applicable if 'Yes' to 4.1.9, otherwise tick 'NA']</i> Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant has identified and engaged the services of another person to maintain the trust account for the safeguarding of customers' assets. The applicant has an existing trust account that is already set up and maintained with this safeguarding person that the applicant has engaged. This has been verified against the relevant supporting documents, such as contractual agreements with the safeguarding person.</p>	-
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.12 <i>[Applicable if 'Yes' to 4.1.9, otherwise tick 'NA']</i> Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant will, before opening a trust account maintained with a safeguarding person for the purpose of depositing assets belonging to a customer, assess, and satisfy itself of, the suitability of the safeguarding person with respect to the depositing of assets belonging to its customers in a trust</p>	PS Amendment Regs 18D(a) and Guidelines Para 3.2.1, 3.3.1

			account maintained with the safeguarding person.	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.13 <i>[Applicable if 'Yes' to 4.1.9, otherwise tick 'NA']</i> Based on a review of the applicant's policies and procedures, written notice as well as acknowledgment from the safeguarding person, the documents meet the following requirement.</p> <p>The applicant will, before depositing any assets belonging to a customer in the trust account, give written notice to the safeguarding person and obtain an acknowledgment from the safeguarding person that —</p> <p>a) all assets deposited in the trust account are held on trust by the applicant for its customer;</p> <p>b) the trust account is designated as a trust account, or a customer's or customers' account, which is distinguishable and maintained separately from any other account maintained with the safeguarding person in which the applicant deposits its own assets; and</p> <p>c) the safeguarding person must not claim any lien, right of retention or sale over any asset in the trust account, except —</p> <p>(A) if the applicant has obtained the customer's written consent to the lien, right of retention or sale and the applicant has notified the safeguarding person in writing of the written consent; or</p> <p>(B) if the customer and applicant have agreed to a charge relating to the safeguarding of the assets, and the lien, right of retention or sale is claimed over that charge.</p>	PS Amendment Regs 18D(d) and Guidelines Para 3.3.2
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.14 <i>[Applicable if 'Yes' to 4.1.9, otherwise tick 'NA']</i> Based on a review of the applicant's policies and procedures, as well as customer agreement forms, the documents meet the following requirement.</p>	PS Amendment Regs18(D)(e) and Guidelines Para 3.3.3, 3.34, 3.6.1, 3.6.2

			<p>Before depositing any assets belonging to a customer in the trust account, the applicant has disclosed in writing to its customer –</p> <ul style="list-style-type: none"> a) The fact that the assets will be held by the applicant on behalf of the customer in a trust account with a safeguarding person; b) whether or not the assets will be deposited together with, and commingled with, assets belonging to other customers of the applicant or of the safeguarding person; c) if the assets will be so deposited and commingled, the risks the risks arising from such commingling; d) the consequences for the customer in respect of the assets if the safeguarding person becomes insolvent; e) the terms and conditions agreed with the safeguarding person that would apply to the safeguarding person’s safeguarding of the assets. <p>Where the applicant maintains the trust account with a safeguarding person outside Singapore, the applicant should disclose in writing to its customer –</p> <ul style="list-style-type: none"> (a) the fact that the laws and practices relating to trust accounts in the jurisdiction under which the safeguarding person is licensed, registered or authorised may be different from the laws and practices in Singapore relating to trust accounts; and (b) the fact that any such differences may affect the ability of the customer to recover the customers’ assets deposited in the trust account. 	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.15 <i>[Applicable if ‘Yes’ to 4.1.9, otherwise tick ‘NA’]</i> Based on a review of the applicant’s policies and procedures, the documents meet the following requirement.</p> <p>The applicant will assess, and satisfy itself of, the suitability of any safeguarding person with which a trust account is maintained in which those assets are deposited, on an</p>	PS Amendment Regs 18D(b)

			annual basis subsequent to the depositing of the assets.	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.16 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant will not commingle assets belonging to a customer with other assets, except that the applicant may –</p> <p>a) deposit any assets belonging to a customer in a trust account with, and commingled with, assets belonging to its other customers;</p> <p>b) deposit its own assets in a trust account in order to –</p> <p>i. open the trust account; or</p> <p>ii. facilitate the settlement of fees arising from a transaction carried out on behalf of a customer in accordance with the customer's written instructions.</p>	PS Amendment Regs 18C(1)(c), 18C(2) and Guidelines Para 3.2.3
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.17 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant will, by the end of every business day, complete a computation of –</p> <p>a) the total amount of assets belonging to its customers deposited in trust accounts, as at the end of the previous business day; and</p> <p>b) the total amount of assets belonging to its customers required under PS Amendment Regs 18B(1)(a) to be deposited in custody trust accounts, as at the end of the previous business day.</p>	PS Amendment Regs 18(H)(1) and Guidelines Para 4.4.4
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.18 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant does not transfer any right, interest, benefit or title in any assets belonging to a customer that are deposited in a trust account to itself or any other person. However, the applicant may –</p>	PS Amendment Regs 18C(1)(d), 18C(3), 18C(4)

			<p>a) transfer any right, interest, benefit or title in the assets belonging to a customer from a trust account maintained with a safeguarding person to itself or another person if the transfer is authorised by the customer's specific written instructions given before the transfer; or</p> <p>b) transfer its own assets deposited in a trust account in accordance with PS Amendment Regs 18C(2)(b), and any return arising on those assets.</p>	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.19 Based on a review of the applicant's policies and procedures, as well as the relevant contractual agreements, the documents meet the following requirement.</p> <p>The applicant must apply any assets belonging to a customer that are deposited in a trust account solely for such purpose as may be agreed to by the customer.</p>	PS Amendment Regs 18C(1)(d)
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.20 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant will record and maintain a separate book entry for each customer in relation to any assets belonging to the customer that are received from, or on account of, the customer.</p> <p>The applicant will keep books in the English language which contain —</p> <p>a) particulars of every transaction carried out on behalf of a customer, including —</p> <ol style="list-style-type: none"> i. a description and the quantity of assets that are the subject of the transaction; ii. the price and fee arising from the transaction; iii. the name of the customer on whose behalf the transaction is entered into; iv. the name of the counterparty to the transaction; and v. the transaction date and settlement or delivery date; 	PS Amendment Regs 18(F)

			<p>vi. in the case of a transaction in which a customer lends assets deposited in a trust account—</p> <p>(A) the terms and conditions of the transaction; and</p> <p>(B) if any collateral is received, a description of the collateral received; and</p> <p>b) the amount and description of each asset deposited in a trust account as required under PS Amendment Regs 18B(1)(a) and the date of such deposit;</p> <p>i. the date and quantity of each transfer of assets from or to any trust account mentioned in sub-paragraph (b) arising from any borrowing or lending activity or otherwise in respect of such assets;</p> <p>ii. the date, amount and purpose of each transfer of assets from any trust account mentioned in sub-paragraph (b);</p> <p>iii. the date and amount of, and the reason for, each disposal of collateral from any trust account mentioned in sub-paragraph (b);</p> <p>iv. whether the customer has a trust account maintained by the applicant solely for that customer, or shares the same trust account with other customers of the applicant; and</p> <p>v. the name of each safeguarding person with whom the applicant deposits any assets belonging to the customer.</p>	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.21 Based on a review of the applicant’s policies and procedures, the documents meet the following requirement.</p> <p>The applicant has put in place systems and controls concerning the assessment and management of risks in relation to the safeguarding of assets belonging to a</p>	PS Amendment Regs 18G(a) and Guidelines Para 3.4.2

			<p>customer are adequate and appropriate for the scale and nature of its operations¹⁹.</p> <p>These include systems and controls that:</p> <ul style="list-style-type: none"> • restrict any individual from being able to solely authorise and effect the movement, transfer or withdrawal of customers' assets; • control the movement or transfer of customers' assets between the applicant's storage systems and devices; and • are capable of preventing the unauthorised access or loss of the digital payment token instruments associated with the customers assets that are held or managed by the applicant. <p>Applicants who have engaged a safeguarding person have performed the necessary due diligence checks to ensure that the above systems and controls (where applicable) are in place, before entering into such arrangements with the safeguarding person.</p>	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.22 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant has taken all reasonable measures to maintain the integrity and security of the means used to safeguard the digital payment token instruments relating to the digital payment tokens belonging to the customer²⁰</p> <p>These include the following measures:</p> <ul style="list-style-type: none"> • Controls to secure the storage and transmission of customers' assets. For example, if a digital payment token service provider stores the means of access (e.g. private keys) to customers' 	PS Amendment Regs 18G(b) and Guidelines Para, 3.4.5

¹⁹ For the sole purpose of completing 4.1.21 of this attestation form, the external auditor can tick 'Yes' if there is nothing material that comes to the auditor's attention that causes the auditor to believe that this requirement is not met, based on a review of the applicant's policies and procedures.

²⁰ For the sole purpose of completing 4.1.22 of this attestation form, the external auditor can tick 'Yes' if there is nothing material that comes to the auditor's attention that causes the auditor to believe that this requirement is not met, based on a review of the applicant's policies and procedures.

			<p>assets in a physical device (e.g. a computing device), the device must be secured (e.g. through restricted access) to mitigate the risk of loss of customers' assets. If a digital payment token service provider uses multi-party computation for the storage and transmission of assets, the key shares must be held by different parties and no one party is able to authorise and effect the movement of customers' assets (e.g. if there are 3 key shares, 2 out of 3 parties holding the key shares are required to authorise a transaction).</p>	
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>4.1.23 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant store at all times the digital payment token instruments relating to at least 90% of customers' assets (which have been deposited in trust accounts) in systems that are not connected to the Internet or any other form of wireless communication ("cold wallets"). The applicant conducts periodic reviews and consider keeping a higher than 90% proportion of customers' assets in cold wallets, while taking into account their business and operational needs and other security controls that can mitigate the risk of loss of customers' assets.</p>	Guidelines Para 3.4.4
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.24 Based on a review of the applicant's policies and procedures, as well as customer agreement forms, the documents meet the following requirement.</p> <p>The applicant has disclosed to customers its policy on storage arrangements for customers' assets, including information on the circumstances under which the applicant keeps the customers' assets in systems that are connected to the Internet, the applicant's considerations for doing so, and the measures that the applicant put in place to mitigate the risk of loss.</p>	Guidelines Para 3.4.6 and 3.4.9

			Where the customers' assets are stored in devices located outside of Singapore, the applicant should also clearly disclose to its customers the fact that the customers' assets are stored in devices located in a foreign jurisdiction.	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.25 Based on a review of the applicant's policies and procedures, as well as customer agreement forms, the documents meet the following requirement.</p> <p>The applicant has a compensation framework in place for handling losses of customers' assets arising from applicant's fraud or negligence. The applicant has disclosed this framework in writing to its customer on its public-facing platform (for example, under the FAQ section of its website), specifying the type of incidents covered, the steps that a customer should take when such incidents arise, the investigation or resolution process of the digital payment token service provider and if insurance is provided, the scope of coverage and the claims process.</p> <p>Where the customers' assets are stored in devices located outside of Singapore, the applicant the fact that the laws and practices in the foreign jurisdiction may be different from the laws and practices in Singapore, and the fact that any such differences may affect the ability of the customer to recover the assets (such as a prolonged delay in the recovery process).</p>	Guidelines Para 3.4.7
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.26 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant's senior manager(s) and personnel who have control over the movement of customers' assets reside in Singapore. These senior manager(s) and personnel have the capability, knowledge, experience, and authority to facilitate the return of customers' assets where required by MAS or in court proceedings. Where the customers' assets are stored in devices</p>	Guidelines Para 3.4.8 and 3.4.9

			located outside of Singapore, the movement of customers' assets should remain to be controlled by senior managers and personnel who are resident in Singapore.	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.27 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant has developed formalised policies, procedures and controls in relation to putting in place controls and segregation of duties²¹, to mitigate the risk of conflict between the duties relating to the safeguarding of assets belonging to a customer and the business interests. Potential risks of conflict between the duties relating to the safeguarding of assets belonging to a customer and the interests relating to the business of the applicant are clearly identified, monitored and documented.</p> <p>This includes putting in place:</p> <ul style="list-style-type: none"> a) checks and balances with periodic reviews to assess the effectiveness of the overall risk management framework; b) segregation of duties to guard against the risk of unauthorised transactions, fraudulent activities and manipulation of data for personal gain or for concealment of irregularities or financial losses; c) periodic reviews of the responsibilities of personnel responsible and accountable for safeguarding customers' assets to mitigate the risk of conflicts of interest and ensure that there are independent checks for proper segregation of duties; and d) policies, procedures and controls to manage potential conflicts of interest. 	PS Amendment Regs18G(c), 18G(d) and Guidelines Para 3.5.1, 3.5.2

²¹ For the sole purpose of completing 4.1.27 of this attestation form, the external auditor can tick "Yes" if there is nothing material that comes to the auditor's attention that causes the auditor to believe that this is not met, based on a review of the applicant's policies and procedures.

<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.28 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant ensures that the safeguarding of assets belonging to a customer is not performed by, or performed under the influence or direction of, persons who execute trades, make investment decisions or make trading decisions.²²</p>	PS Amendment Regs 18(G)(e)
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.29 Based on a review of the applicant's policies and procedures, the documents meet the following.</p> <p>The applicant has ensured clear reporting lines for safeguarding personnel²³ up to a senior manager who is resident in Singapore, which are separate from personnel who make investment decisions, trading decisions or other discretionary decisions resulting in the transfer or disposal of customers' assets. The applicant has arrangements that ensure that safeguarding personnel can report directly to the senior management and the board of directors of the digital payment token service provider, on matters relating to the safeguarding of customers' assets.</p>	PS Amendment Regs 18(G)(c) and Guidelines Para 3.5.4
			<i>Statement of account</i>	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.30 Based on a review of the applicant's policies and procedures, the documents meet the following requirement.</p> <p>The applicant will on a monthly basis furnish each customer a statement of account containing, where applicable, the following particulars:</p> <p>a) transactions to purchase or sell assets entered into by the customer and the price at which the transactions are entered into;</p>	Guidelines Para 3.7.1 to 3.7.3

²² As explained in Paragraph 3.5.4 of the Guidelines on Provision of Consumer Protection Safeguards by DPTSPs, the applicant should put in place clear reporting lines for safeguarding personnel, up to a senior manager who is resident in Singapore, which are separate from personnel who make investment decisions, trading decisions or other discretionary decisions resulting in the transfer or disposal of customers' assets.

²³ As referred to in Paragraph 3.5.2 of the Guidelines on Provision of Consumer Protection Safeguards by DPTSPs

			<p>b) the status of every asset in the digital payment token service provider’s custody held for the customer, including any asset deposited with a safeguarding person;</p> <p>c) the movement of every asset of the customer, the date of and reasons for such movement, and the amount of the asset involved;</p> <p>d) the movement and balance of money received on account of the customer;</p> <p>e) a detailed account of all financial charges and credits to the customer’s account during the monthly statement period, unless the detailed account of financial charges and credits has been included in any contract note or tax invoice issued by the holder to the customer.</p> <p>However, this is not applicable where –</p> <p>i. there is no change to any of those particulars since the date on which the last statement of account was made up to;</p> <p>ii. the applicant has made available to the customer, on a real-time basis, those particulars in the form of electronic records stored on an electronic facility and the customer has consented to those particulars being made available to him in this manner; or</p> <p>iii. the customer has requested, in writing, not to receive the statement of account on a monthly basis from the applicant.</p> <p>Notwithstanding this exception, the applicant should still provide customers with the statement of account as soon as practicable, if it receives a request from the customer for the statement of account.</p>	
			<i>Lending and staking of customers’ assets</i>	
<input type="checkbox"/>	<input type="checkbox"/>		<p>4.1.31 Based on a review of the applicant’s policies and procedures, the documents meet the following requirement.</p> <p>The applicant does not:</p>	Guidelines Para 3.8.1, 3.8.4

		<p>a) mortgage, charge, pledge or hypothecate any assets belonging to a retail customer;</p> <p>b) lend, or arrange to lend, any assets received belonging to a retail customer;</p> <p>or</p> <p>c) stake, or arrange to stake, any assets belonging to a retail customer.</p> <p>The applicant should, prior to carrying out any transaction mentioned in (a) to (c) on behalf of a customer who is not a retail customer, provide clear written disclosures of the risks of such transactions to the customer and obtain the customer's written acknowledgment of the risks.</p>	
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4.2 If you have indicated 'Yes' to any of the above in Section 4.1, please explain why. Otherwise, please indicate nil. *

Subsection that was indicated as 'Yes'	Reason

4.3 If you have indicated 'No' to any of the above in Section 4.1, please explain why. Otherwise, please indicate nil. *

Subsection that was indicated as 'No'	Reason

4.4 If you have indicated 'NA' to any of the above in Section 4.1, please explain why. If you have indicated 'NA' as it has been instructed in Section 4.1, please indicate nil. *

Subsection that was indicated as 'NA'	Reason

4.5 If there are any material observation(s) that has come to your attention in the course of your procedures, please elaborate below. Otherwise, please indicate nil. *

Remarks

4.6 Set out any additional information that is relevant, if any. Otherwise, please indicate nil. *

Remarks

SECTION 5: DECLARATION BY AN EXTERNAL AUDITOR

5.1 Please provide your declaration below. The declaration must be filled and signed with electronic signatures. Accepted forms of electronic signatures include e-signature via third party applications or appending the signature image by clicking on the Signature box below.

We, Full Name of External Auditor as per ACRA/ business profile, declare that:

- We meet the requirements of completing this attestation report as specified in the Transitional Regulations 2024:
- a) Full Name of External Auditor as per ACRA/ business profile is a company, firm or limited liability partnership approved or deemed to be approved as an accounting corporation, accounting firm or accounting limited liability partnership, respectively, under the Accountants Act 2004;
 - b) Full Name of External Auditor as per ACRA/ business profile has made at least one report in respect of a reasonable assurance audit conducted on a financial institution regulated or authorised by MAS;
 - c) The specific partner conducting this AUP engagement is an individual who is registered or deemed to be registered under the Accountants Act 2004 as a public accountant; and
 - d) The specific partner conducting this AUP engagement has conducted at least one reasonable assurance audit on a financial institution regulated or authorised by MAS.

In respect of (b) and (d) above, the reasonable assurance audit performed must have been performed in accordance with the Singapore Standards on Assurance Engagements 3000 (Revised) or Singapore Standards on Auditing issued and updated from time to time by the Institute of Singapore Chartered Accountants and include an audit of compliance with ML/TF requirements.

- Based on our procedures and evidence that we have obtained, nothing has come to our attention that causes us to believe that the records of transactions, including relevant registers and copies of customer identification documents have not been properly maintained by Full Name of Notified Entity as per ACRA/ business profile.

- All information given in this attestation for Full Name of Notified Entity as per ACRA/ business profile has been assessed independently, is true to the best of our knowledge and we have not suppressed any material fact.*

Signature: _____

Name of firm: _____

Date: _____

SECTION 6: SUPPORTING DOCUMENT

6.1 Please provide the supporting documents that have been checked in this form. These attachments should be submitted via the FormSG platform.

6.2 Please attach a copy (PDF) of this attestation form that has been filled in and signed off by the appointed External Auditor.