## Client Update: Singapore

2023 JULY



**Financial Institutions** 

# MAS Issues Industry Perspectives on Best Practices – Management of Money Laundering, Terrorism Financing and Sanctions Risks from Customer Relationships with a Nexus to Digital Assets

On 11 July 2023, the Monetary Authority of Singapore ("MAS") published a paper titled "Industry Perspectives on Best Practices – Management of Money Laundering, Terrorism Financing and Sanctions Risks from Customer Relationships with a Nexus to Digital Assets" ("Paper"). The Paper is produced by the AML/CFT Industry Partnership ("ACIP") working group on Digital Assets Risk Management.

By way of background, the Digital Assets Risk Management Group was established under the ACIP in August 2022 and included representatives from the banks (OCBC, SCB, HSBC, JP Morgan, DBS, UOB, Citibank, Maybank), MAS, Commercial Affairs Department and Ernst & Young.

The Paper aims to provide financial institutions ("**FIs**") with a foundational framework to advance understanding and management of money laundering ("**ML**"), terrorism financing ("**TF**") and sanctions risks arising from customer relationships with nexus to digital assets in the Singapore context by:

- (a) presenting a high-level overview on the classes of digital assets and proposing risk factors for assessing relevance of digital assets from the AML/CFT perspective;
- (b) identifying the possible types of customer nexus to digital assets such as cryptocurrencies and analysing the underlying risk profiles; and
- (c) clarifying risk management objectives and assessing incremental risk management capabilities required to manage these associated risks.

The Paper also shares case studies and highlights the "red flags" and best practices that FIs could adopt to identify, manage and mitigate the associated ML, TF and sanctions risks.



# Client Update: Singapore

2023 JULY



### **Contacts**



**Regina Liew** Head, Financial Institutions Group

T +65 6232 0456

regina.liew@rajahtann.com



**Larry Lim**Deputy Head, Financial Institutions Group

T +65 6232 0482

larry.lim@rajahtann.com



Hamidul Haq
Partner, White Collar Crime
T +65 6232 0398
hamidul.haq@rajahtann.com



Thong Chee Kun
Partner, White Collar Crime
T +65 6232 0156

chee.kun.thong@rajahtann.com

Please feel free to also contact Knowledge Management at <a href="mailto:eOASIS@rajahtann.com">eOASIS@rajahtann.com</a>

# Client Update: Singapore

2023 JULY



### **Regional Contacts**

R&T SOK & HENG | Cambodia

**R&T Sok & Heng Law Office** T +855 23 963 112 / 113

F +855 23 963 116

kh.rajahtannasia.com

RAJAH & TANN 立杰上海

SHANGHAI REPRESENTATIVE OFFICE | China

Rajah & Tann Singapore LLP Shanghai Representative Office

T +86 21 6120 8818

F +86 21 6120 8820

cn.rajahtannasia.com

ASSEGAF HAMZAH & PARTNERS | Indonesia

Assegaf Hamzah & Partners

**Jakarta Office** 

T +62 21 2555 7800

F +62 21 2555 7899

Surabaya Office

T +62 31 5116 4550

F +62 31 5116 4560

www.ahp.co.id

RAJAH & TANN | Lao PDR

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239

F +856 21 285 261

la.rajahtannasia.com

CHRISTOPHER & LEE ONG | Malaysia

**Christopher & Lee Ong** 

T +60 3 2273 1919

F +60 3 2273 8310

www.christopherleeong.com

RAJAH & TANN | Myanmar

Rajah & Tann Myanmar Company Limited

T +95 1 9345 343 / +95 1 9345 346

F +95 1 9345 348

mm.rajahtannasia.com

GATMAYTAN YAP PATACSIL

GUTIERREZ & PROTACIO (C&G LAW) | Philippines

Gatmaytan Yap Patacsil Gutierrez & Protacio (C&G Law)

T +632 8894 0377 to 79 / +632 8894 4931 to 32

F +632 8552 1977 to 78

www.cagatlaw.com

RAJAH & TANN | Singapore

Rajah & Tann Singapore LLP

T +65 6535 3600

sg.rajahtannasia.com

RAJAH & TANN | *Thailand* R&T Asia (Thailand) Limited

T +66 2 656 1991

F +66 2 656 0833

th.rajahtannasia.com

RAJAH & TANN LCT LAWYERS | Vietnam

Rajah & Tann LCT Lawyers

Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673

F +84 28 3520 8206

**Hanoi Office** 

T +84 24 3267 6127

F +84 24 3267 6128

www.rajahtannlct.com

Rajah & Tann Asia is a network of legal practices based in Asia.

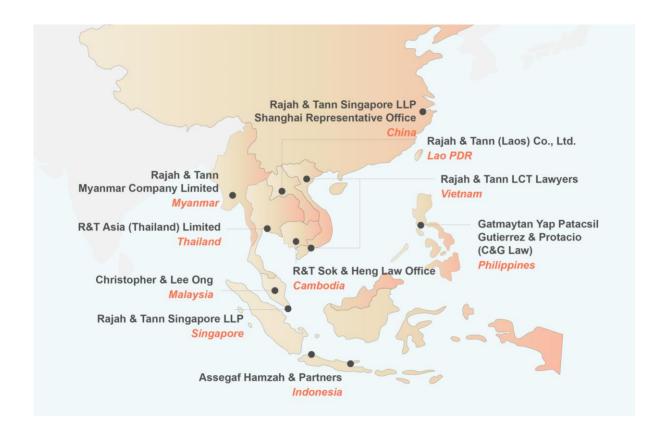
Member firms are independently constituted and regulated in accordance with relevant local legal requirements. Services provided by a member firm are governed by the terms of engagement between the member firm and the client.

This update is solely intended to provide general information and does not provide any advice or create any relationship, whether legally binding or otherwise. Rajah & Tann Asia and its member firms do not accept, and fully disclaim, responsibility for any loss or damage which may result from accessing or relying on this update.

# Client Update: Singapore 2023 JULY



### **Regional Presence**



Rajah & Tann Singapore LLP is one of the largest full-service law firms in Singapore, providing high quality advice to an impressive list of clients. We place strong emphasis on promptness, accessibility and reliability in dealing with clients. At the same time, the firm strives towards a practical yet creative approach in dealing with business and commercial problems. As the Singapore member firm of the Lex Mundi Network, we are able to offer access to excellent legal expertise in more than 100 countries.

Rajah & Tann Singapore LLP is part of Rajah & Tann Asia, a network of local law firms in Cambodia, China, Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Vietnam. Our Asian network also includes regional desks focused on Brunei, Japan and South Asia.

The contents of this Update are owned by Rajah & Tann Singapore LLP and subject to copyright protection under the laws of Singapore and, through international treaties, other countries. No part of this Update may be reproduced, licensed, sold, published, transmitted, modified, adapted, publicly displayed, broadcast (including storage in any medium by electronic means whether or not transiently for any purpose save as permitted herein) without the prior written permission of Rajah & Tann Singapore LLP.

Please note also that whilst the information in this Update is correct to the best of our knowledge and belief at the time of writing, it is only intended to provide a general guide to the subject matter and should not be treated as a substitute for specific professional advice for any particular course of action as such information may not suit your specific business and operational requirements. It is to your advantage to seek legal advice for your specific situation. In this regard, you may call the lawyer you normally deal with in Rajah & Tann Singapore LLP or email Knowledge Management at eOASIS@rajahtann.com.