

**AML/CFT<sup>1</sup> Regime for Regulated Dealers**

# INDUCTION BRIEFING

**AML/CFT Division  
Ministry of Law**

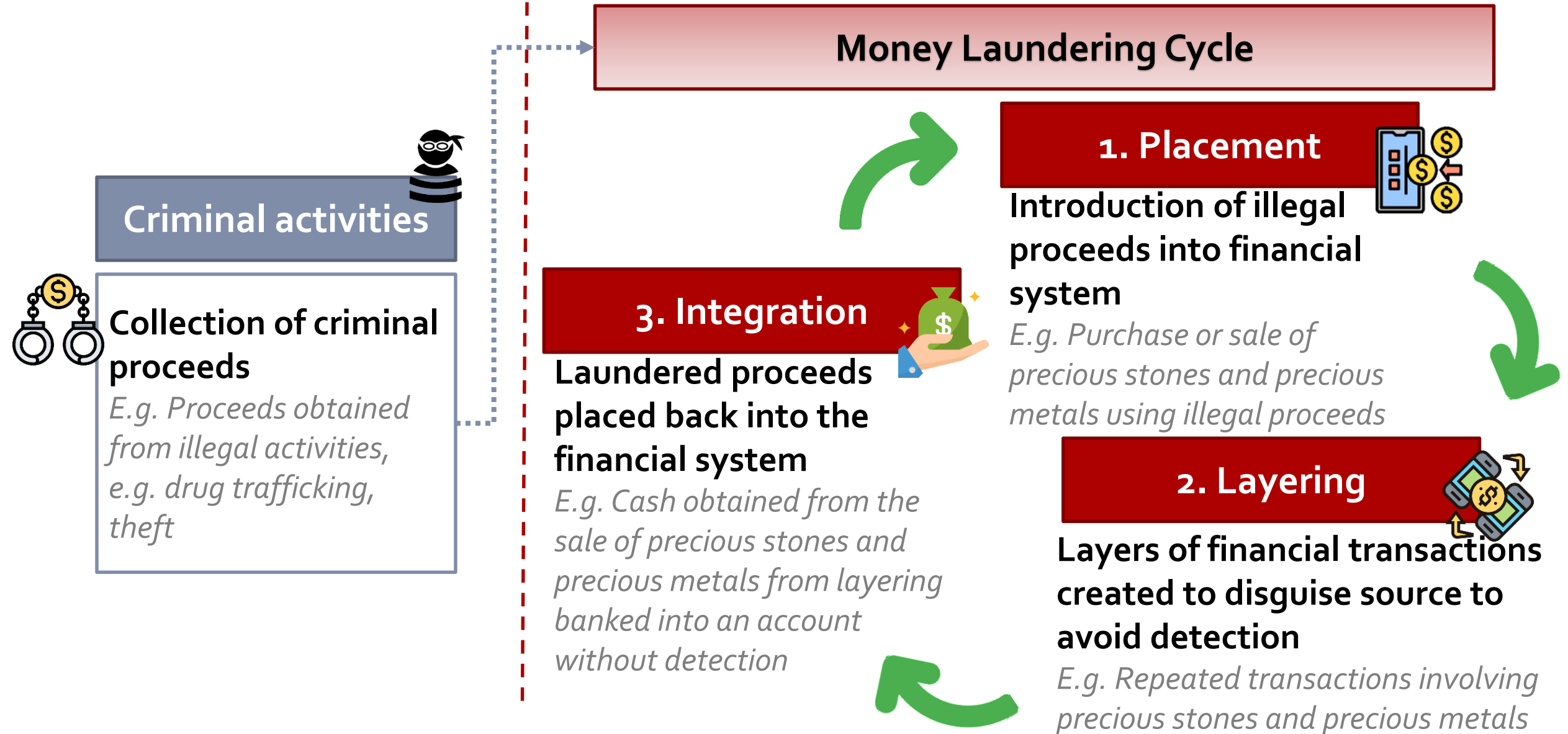
**17 December 2019**

<sup>1</sup>*AML/CFT: Anti-Money Laundering/Countering the Financing of Terrorism*

# PSPM ACT

Precious Stones and Precious Metals Dealers (“**PSMD**”) Sector

Money laundering (“ML”) is the process of concealing the proceeds of a crime so that they appear to have originated from legitimate sources.



## ≡ THE STRAITS TIMES

SINGAPORE > Courts & Crime Education Ho

4. Rogue lawyer David Rasif absconded with \$11.3m of his clients' money

### Took place in 2006:

"In 2010, the Commercial Affairs Department (CAD) here was able to recover **\$6.4 million in cash and gold** both here and abroad.

CAD had also been able to seize **40 of the 47 gold bars** that Rasif had bought for **\$1.65 million** in June 2006."

## ≡ THE STRAITSTIMES

SINGAPORE > Courts & Crime Education H

SkillsFuture fraud: \$6.7m cash, 11kg gold kept in Sengkang flat

### Took place in 2018:

"...was sentenced to **five years and eight months in jail for money laundering.**

On Oct 30 and 31 last year, she bought **6kg of gold bars worth \$344,000** from two **jewellery shops...**

...collect another **five 1kg gold bars worth \$282,500.** By Nov 1, there were **\$6.7 million in cash and 11kg of gold** in the safe."

Terrorism financing (“TF”) is the funding of terrorism or terrorist groups. Sources of terrorism financing may be legitimate or illegitimate.



**Purchase precious stones and precious metals**

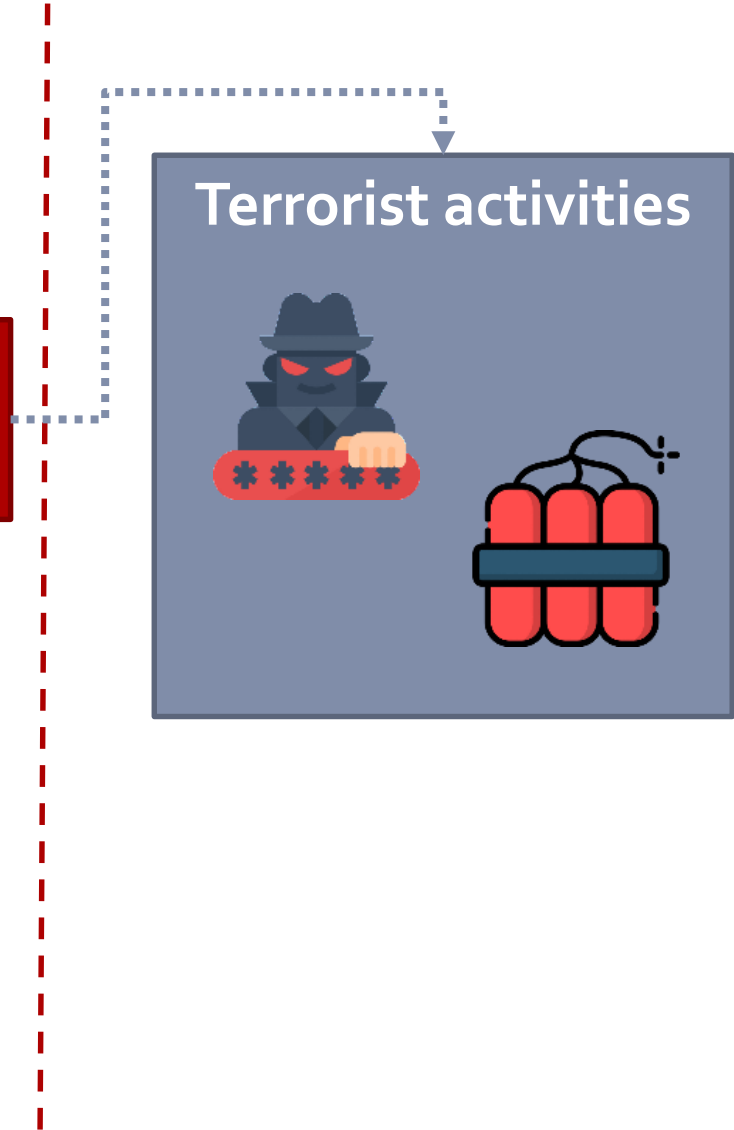
**Resale of precious stones and precious metals**

**Raise funds**

Purchase precious stones and precious metals in Singapore

Resale of precious stones and precious metals locally or abroad at higher price

Profits derived from sale of precious stones and precious metals





Singapore

**4 radicalised Bangladeshi men jailed for 2-5 years for financing terrorism**

## Took place in 2016:

“Four Bangladeshi nationals... **conviction under the Terrorism (Suppression of Financing) Act.**

They formed ‘lone-wolf **pro-ISIS terrorist group**’.

He had **donated \$300 to the cause. Documents on weapons and bomb making...**

**Four men detained under Internal Security Act.”**

THE STRAITS TIMES

SINGAPORE

Courts & Crime

Education

Ho

**Singaporean man, 35, charged with providing money to support ISIS propaganda efforts**

## Took place in 2019:

“...**provided \$450** to an individual in Turkey on Oct 31, 2014, **for the publication of ISIS propaganda.**

“**This act of providing money in support of terrorist purposes is a serious offence, regardless of the amount, under the Terrorism (Suppression of Financing) Act**”, said MHA.”

Characteristics of precious stones, precious metals and precious products (“PSPM”) expose the PSMD sector to ML/TF risks.

### **Good stores of value**

- PSPMs are used to launder criminal proceeds with low risk of value loss

### **Portable**

- PSPMs are easy to transport and conceal

### **Easily convertible to cash**

- PSPMs are used to support or finance illicit activities as it is difficult to trace original ownership or true value

*An Act to regulate persons who carry on a business of regulated dealing or as an intermediary for regulated dealing, so as to prevent money laundering and terrorism financing.*

New law implemented on 10 April 2019

### PSPM Act

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

### PMLTF Regulations

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

### Guidelines

Guidelines for Regulated Dealers ("**Guidelines**")



Download the **Guidelines** at <https://acd.mlaw.gov.sg/guidance-materials/>



## Register with the Registrar of Regulated Dealers

### Entity-based requirements

Conduct **ML/TF risk assessment** with measures to address the risks

Develop internal policies, procedures and controls ("**IPPC**"), including:

- **train** your employees
- conduct independent **audit** for regulated dealers which **conduct cash transactions exceeding S\$20,000**

### Transaction-based requirements

Conduct Customer Due Diligence ("**CDD**")

Conduct Enhanced Customer Due Diligence ("**ECDD**")

File Cash Transaction Reports ("**CTR**")

File Suspicious Transaction Reports ("**STR**")

**Keep records** for 5 years



Refer to the **Guidelines on "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"**

# TRANSACTION-BASED REQUIREMENTS



Download the **Guidelines** at <https://acd.mlaw.gov.sg/guidance-materials/>

## CTR

- File a CTR within 15 business days after any designated transaction.
- The CTR could be filed electronically via Suspicious Transaction Reporting Office Online Notices and Reporting Platform ([SONAR](https://www.police.gov.sg/sonar)) at <https://www.police.gov.sg/sonar>.
- A copy of the CTR need to be kept for a period of 5 years from the date of transaction.
- It is an **offence** not to lodge CTR.

## STR

- **File a STR immediately** or at the earliest opportunity when:
  1. CDD could not be performed/ completed.
  2. Any suspicion of money laundering and/or terrorism financing-related activities.
- The STR could be filed electronically via [SONAR](https://www.police.gov.sg/sonar) at <https://www.police.gov.sg/sonar>.
- The STR has to be kept for 5 years from the date of transaction and remain **confidential to protect the identity of the informer**.
- It is an **offence** not to lodge STR.

SONAR website



Refer to the *Guidelines on "Disclosure of Information"*

ML  
riskTF  
risk

## How to submit CTR and STR, for example:

1

**Register** for SONAR user account at <https://www.police.gov.sg/sonar>.



2

Submit **CTR** Form NP 784 within **15 business days**, and/or submit **STR** **immediately** via **SONAR**.



3

**Keep a copy** of the CTR/STR for 5 years.



Refer to the **Guidelines on "Disclosure of Information"**

### Example of Transaction-Based Requirements

SAMPLE

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

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

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

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

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

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

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

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



Refer to the **Guidelines on "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"**

ML risk  
TF risk

## Transaction-Based Requirements

1

Conduct customer due diligence (“**CDD**”) under certain circumstances, file **CTR** for cash transactions above S\$20,000.



2

Conduct enhanced customer due diligence (“**ECDD**”) to assess if the customer is of higher-risk.  
  
If found to be suspicious, terminate the transaction and file a **STR**.



3

**Keep records** of designated transactions and related documents for 5 years.



Refer to the **Guidelines on “Customer Due Diligence”, “Enhanced Customer Due Diligence” and “Record Keeping”**

# When to conduct CDD?



Designated Transaction  
> **S\$20,000 cash or cash equivalent.**

File CTR



**Suspicion** of money laundering (“ML”) or terrorism financing (“TF”).

File STR



**Doubts** on the veracity or adequacy of information from earlier CDD (e.g. for existing customers).



Refer to the **Guidelines on “Customer Due Diligence” and “Annex D – Red Flag Indicators for Regulated Dealers”**

ML risk

TF risk

## How to conduct CDD, for example:

1

Obtain, record and verify customer's **identifying information.**



2

**Screen** customer against terrorists designations and lists of designated individuals and entities, and **assess ML/TF risk.**

MHA website: terrorists designations



MAS website: Lists of designated individuals and entities



3

Any **positive hits** from screening?  
If **yes** – stop transaction & report to police.  
If **no** – proceed with transaction.



Refer to the **Guidelines on "Customer Due Diligence"**

<b>Annex E Sample CDD Form</b>	
<b>Customer Due Diligence (CDD)</b>	
<b>FORM A – Customer’s Particulars</b>	
Name of regulated dealer:	Date:
Name of employee:	Signature of employee:
<b>A1. Customer’s Particulars (For Individuals)</b>	
1.	Transaction number:
2.	Date/Time of transaction:
3.	Transaction value:
4.	Description of PSPM:
5.	Full name (including any alias):
6.	Date of birth:
7.	Residential address:
8.	Contact No:

SAMPLE



Refer to the **Guidelines on "Annex E – Sample CDD Form – Form A"**

SAMPLE

**Customer Due Diligence (CDD)****FORM B – Check customer's name against lists on:**

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

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

Name of regulated dealer:

Date:

Name of employee:

Signature of employee:

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

1.

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

Any match?

 Yes/  No


Refer to the **Guidelines on "Annex E – Sample CDD Form – Form B"**

## When to conduct ECDD?



Politically-exposed person (“PEP”), relatives or close associates of PEP.



**Higher risk country or jurisdiction.**  
(Current examples: North Korea, Iran)



Person with **high money laundering/terrorism financing risks.**

Refer at:

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



Refer to the **Guidelines on “Enhanced Customer Due Diligence”**

ML  
riskTF  
risk

## How to conduct ECDD, for example:

1

Establish customer's **source of wealth** and **source of funds**.



2

**Obtain approval** from senior management **before** entering or continuing transaction. File **STR** if necessary.



3

Conduct **enhanced ongoing monitoring** of the transaction.



Refer to the **Guidelines on "Enhanced Customer Due Diligence"**

SAMPLE

## Annex D Red Flag Indicators for Regulated Dealers

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

### Red Flag Indicators: Customers

#### Transaction Patterns

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



Refer to the **Guidelines on "Annex D – Red Flag Indicators for Regulated Dealers"**

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

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

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

Name of regulated dealer:

Date:

Name of employee:

Signature of employee:

**A. Income Level, Source of Wealth and Source of Funds**

1. Establish the following (by reasonable means e.g. internet scanning and careful enquiries with the customer):

**Income level:****Source of wealth:****Source of funds:**

a. income level;

b. source of wealth / source of



Refer to the **Guidelines on "Annex F – Sample ECDD Form"**



## When to stop a transaction?

To stop the transaction and consider filing a STR when:

You are unable to perform or complete any CDD; or when you have reason to suspect that the transaction or customer(s) involved may be connected with ML/TF.

To stop the transaction and report to the police when:

You suspect that the customer is in the listings for terrorist designation and designated individuals and entities.



Refer to the **Guidelines on "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"**

# ENTITY-BASED REQUIREMENTS



Download the **Guidelines** at <https://acd.mlaw.gov.sg/guidance-materials/>





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

### Example of Entity-Based Requirements

#### Step 1: Do your risk assessment

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

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

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



Refer to the **Guidelines on "Annex A – Example of AML/CFT Flowchart for Regulated Dealers"**

ML risk

TF risk

## Conduct Risk Assessment, for example:

1

**Customer risk.**



2

**Country risk.**

Refer at:

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



3

**Product, Service, Transaction and Delivery Channel risks.**



Refer to the **Guidelines on "Risk Assessment"** and **"Annex B – Sample Risk Assessment Form"**

**SAMPLE**

## Annex B Sample Risk Assessment Form

Name of regulated dealer:	Date of risk assessment:
---------------------------	--------------------------

### A. Background of customers in the previous year

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



Refer to the **Guidelines on "Annex B – Sample Risk Assessment Form"**

ML risk

TF risk

## Develop IPPC, for example:

1

Appoint **Compliance Officer**.



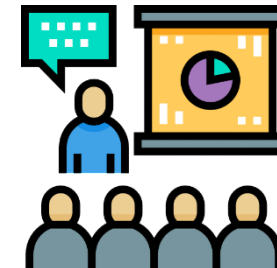
2

Conduct **employee checks** when hiring.



3

**Train** your staff in internal policies, procedures and controls ("**IPPC**").



Refer to the **Guidelines on "Programmes and Measures to Prevent Money Laundering and Terrorism Financing"**

SAMPLE

## Annex C Sample IPPC Document

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

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### Cover Page

Document title: Internal Policies, Procedures and Controls

Name of regulated dealer:

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### Version Control Record

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



Refer to the **Guidelines** on "**Annex C – Sample IPPC Document**"



**Break Time**

# OTHER REGULATORY REQUIREMENTS



Download the **Guidelines** at <https://acd.mlaw.gov.sg/guidance-materials/>



ML risk

TF risk

## Other Measures:

1

Ongoing monitoring of transactions.



2

Record keeping for 5 years.



3

Assess if customer is terrorist or designated person under the United Nations Act.  
***Subscribe to MAS website for alert updates.***

Regulation Focus Areas

Anti-Money Laundering  Enforcement



Refer to the ***Guidelines on "Ongoing monitoring of Transactions", "Record Keeping" and "Additional Measures Relating to Targeted Financial Sanctions"***

### Duty to notify change in place of business:

- Carrying out any regulated activity not specified in application
- Ceasing to carry out regulated activity

### Duty to notify Registrar of change in particulars and circumstances:

- Change in business name or registered office
- Change in address
- Change in telephone, email, fax
- Change in key personnel
- Application for bankruptcy
- Winding up
- Investigation or criminal proceedings



Refer to the **PMLTF Regulations on Regulations 20 and 21**

## Collect Customer Information

- As part of the CDD processes, regulated dealers must **obtain, record and verify** customer’s identifying information through independent and credible sources.
- This can be done by verifying the customer’s identity card, passport or other **government-issued identity document**, which should bear the **photograph** of the customer.



## Laws Requiring Collection of NRIC Number by Organisations

- **PSPM Act** is listed in the Personal Data Protection Council (“PDPC”) website requiring regulated dealers to collect individual’s NRIC or other national identification number under the law.

PAYROLL TAX ACT +

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

PRIVATE EDUCATION ACT +



Refer to the PDPC website at <https://www.pdpc.gov.sg/NRIC-Extracts>

Regulated dealers who **fail to comply with or contravene** any provision in the PSPM Act shall be guilty of an offence, and shall be liable on conviction to a fine or jail term or both.

For example:

**Section 18(5) Keeping of records**

- *Fine not exceeding \$100,000*

**Section 27 – Providing false information to Registrar or authorized officer**

- *Fine not exceeding \$50,000 or to imprisonment for a term not exceeding 2 years or to both*



Refer to the **PSPM Act** at <https://acd.mlaw.gov.sg/guidelines/>



## I should read:



- Guidelines for regulated dealers ("**Guidelines**")  
*On how to comply with regulatory requirements*

**These include:**

- Example of AML/CFT flowchart for regulated dealers
- Sample risk assessment form
- Sample IPPC document
- Sample CDD form
- Sample ECDD form
- Red flag indicators

[\(https://acd.mlaw.gov.sg/guidance-materials/\)](https://acd.mlaw.gov.sg/guidance-materials/)



## I must also refer to:



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

*On terrorist designation and legislation for countering the financing of terrorism*

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



- Information on targeted financial sanctions and lists of designated individuals and entities

*On targeted financial sanctions and lists of designated individuals and entities under the United Nations Regulations*

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



## I would find it useful to read:



- Financial Action Task Force (“FATF”)

*FATF Recommendations and sector specific risk typologies*

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



- FATF reports relevant to PSMD sector

- ML/TF risks associated with gold

<http://www.fatf-gafi.org/media/fatf/documents/reports/ML-TF-risks-vulnerabilities-associated-with-gold.pdf>



- ML/TF through trade in diamonds

<http://www.fatf-gafi.org/media/fatf/documents/reports/ML-TF-through-trade-in-diamonds.pdf>



- Singapore National Risk Assessment Report

*ML/TF risk assessment for Singapore*

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



For enquiries, I may contact:



## CorpPass

*On CorpPass related matters*

Tel: 6643 0577

Mon – Fri: 8am – 8pm

Sat: 8am – 2pm

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

Website: <https://www.corppass.gov.sg>

## GoBusiness Licensing

*On GoBusiness Licensing related matters (Previously LicenceOne)*

Tel: 6774 1430

Mon – Fri: 8am – 8pm

Sat: 8am – 2pm

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

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

## Suspicious Transaction Reporting Office ("STRO")

*On SONAR related matters*

**Queries relating to CTR/STR report filing/reporting regime:**

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

**Queries relating to SONAR accounts/IT issues:**

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

## Personal Data Protection Commission ("PDPC")

*On personal data related matters*

Tel: 6377 3131

Mon – Thu: 8.30am – 6.00pm

Fri: 8.30am – 5.30pm

Online feedback form:

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

## Ministry of Law Services Centre

*On PSPM Act related matters*

**Counter Operating Hours:**

Mon – Fri: 8.30am – 5.00pm

(Closed on Weekends & Public Holidays)

**Enquiry Line Operating Hours:**

Tel: 1800-CALL-LAW

(1800 2255 529)

Mon – Fri: 8.30am – 5.00pm

(Closed on Weekends & Public Holidays)

**Online Enquiry Form:**

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



1

Subscribe to MAS website

- Subscribe to alerts for updates to the lists here: <https://www.mas.gov.sg/subscription-services>

2

Create your SONAR user account

- Sign up for your SONAR user account: <https://www.police.gov.sg/sonar>



3

Perform risk assessment and develop IPPC

- Document the ML/TF risk assessment, and develop IPPC
- Onboarding Workshop designed for your Compliance Officer

4

Check the ACD website and your emails regularly

- Updates to guidance materials and events are at the ACD website: <https://acd.mlaw.gov.sg>
- Notifications are sent to you via email





## Subscribe to MAS website

- Subscribe to alerts for updates to the lists here: <https://www.mas.gov.sg/subscription-services>

### Step 1

Do not key in **space** or **symbols** as the **first character of each field**.

The system does not allow keying in of **certain symbols**. [e.g. #, &, ()]

### Subscriber Services

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

\* refer to mandatory field.

<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>




### Step 2

### Regulation Focus Areas

Anti-Money Laundering

### Step 3

### Security

I'm not a robot   
reCAPTCHA  
Privacy - Terms

SUBMIT



## Create your SONAR user account

- Sign up for your SONAR user account: <https://www.police.gov.sg/sonar>



### Step 1

## WHAT YOU NEED

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

### Step 2

## TO PROCEED

**Login via CorpPass**

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

### Step 3

## Log in with CorpPass

UEN/ENTITY ID

CORPPASS ID

Password

Remember Entity ID

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

Cancel

Login ▶



Perform risk assessment and develop IPPC

- Document the ML/TF risk assessment, and develop IPPC
- Onboarding Workshop designed for your Compliance Officer

### Step 1

- **Compliance Officer** may refer to **Annex B** available in the Guidelines
- **Perform ML/TF risk assessment** of your business and **document it**

**Annex B Sample Risk Assessment Form**

Name of regulated dealer:

A. Background of customers in the pro

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

### Step 2

- **Compliance Officer** may refer to **Annex C** available in the Guidelines
- **Develop the IPPC** and **document it**
- **Train your staff** in IPPC

**Annex C Sample IPPC Document**

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

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Cover Page

Document title: Internal Policies, Procedures and

### Step 3

- Your Compliance Officer may attend the **Onboarding Workshop** if further guidance is preferred
- Look out for our invitation email



Download the **Guidelines** at <https://acd.mlaw.gov.sg/guidance-materials/>



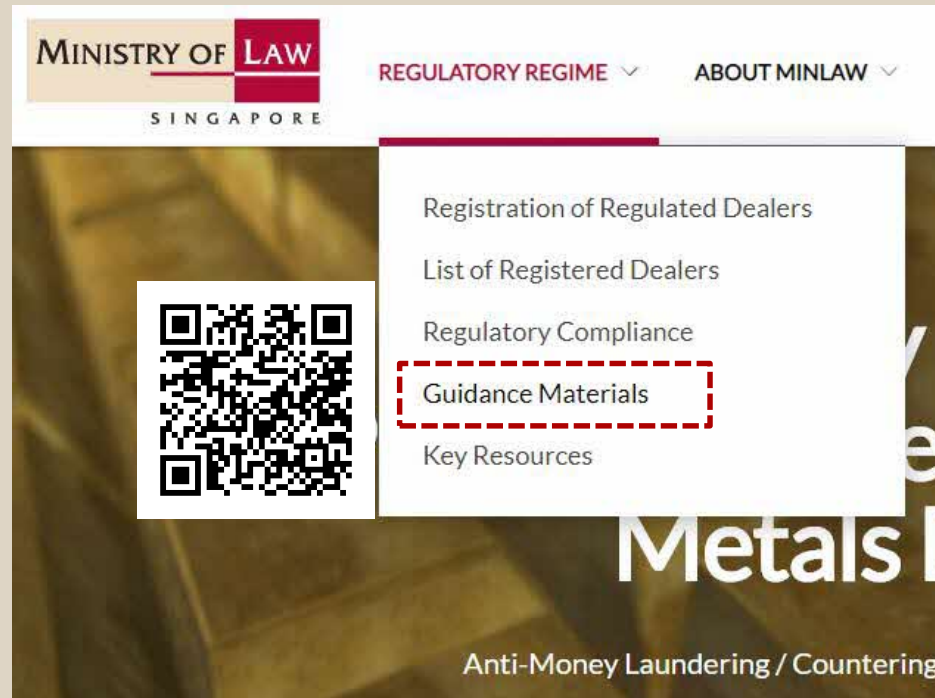
Check the ACD website and your emails regularly

- Updates to guidance materials and events are at the ACD website:
- Notifications are sent to you via email.

<https://acd.mlaw.gov.sg>



## Step 1



## Step 2

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

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

## Step 3

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



**Question 1:**

**Where can I find more information about the regulatory regime?**

**Answer:**

You can find more information on the Anti-Money Laundering/Countering the Financing of Terrorism Division's website at <https://acd.mlaw.gov.sg/>.

**Question 2:**

**How do I inform ACD if there is a change to my Outlet Manager?**

**Answer:**

You must notify the Registrar at least 14 days before any change. You will need to submit an online form at <https://go.gov.sg/notify-acd> before amending your profile via GoBusiness Licensing Portal (<https://www.gobusiness.gov.sg/licences>).



S/N	Type of Amendment	Process	Fees Payable?
1	<p><b>Duty to notify Registrar of change in particulars</b>  <b>(which <u>involves</u> updating information with ACRA)</b></p> <ul style="list-style-type: none"> <li>i. Change of organization details</li> <li>ii. Change of organization registered address</li> <li>iii. Add/Edit Directors/ Managing Directors/ Partners/ Company Secretary/ Owner/ Manager identification particulars</li> <li>iv. Add/Edit substantial shareholder identification particulars</li> </ul>	<p><b><u>Step 1:</u></b>            Notify Registrar via “<b>Notification of Change of Particulars and Circumstances</b>” form            (<a href="https://go.gov.sg/notify-acd">https://go.gov.sg/notify-acd</a>) <b>at least 14 days before</b> the matter occurs.</p> <p><b><u>Step 2:</u></b>            Make the changes with the Accountancy and Corporate Regulatory Authority (ACRA).</p> <p><b><u>Step 3:</u></b>            Submit an amendment application in <b>GoBusiness Licensing Portal</b>            (<a href="https://www.gobusiness.gov.sg/licences">https://www.gobusiness.gov.sg/licences</a>).            The changes in ACRA will be auto populated in the amendment application.</p>	No.

S/N	Type of Amendment	Process	Fees Payable?
2	<p><b>Duty to notify Registrar of change in particulars</b>  <b>(which <u>does not</u> involve updating information with ACRA)</b></p> <ul style="list-style-type: none"> <li>i. Change of applicant details</li> <li>ii. Change of applicant address</li> <li>iii. Change of organization operating address (primary outlet/headquarter)</li> <li>iv. Change of organization contact details</li> <li>v. Change of mailing address</li> <li>vi. Change of compliance officer details</li> <li>vii. Add/Edit outlet manager details</li> <li>viii. Change of approved PSMD licence(s), or equivalent, obtained overseas</li> </ul>	<p><b><u>Step 1:</u></b>  Notify Registrar via “<b>Notification of Change of Particulars and Circumstances</b>” form  (<a href="https://go.gov.sg/notify-acd">https://go.gov.sg/notify-acd</a>) <b>at least 14 days before</b> the matter occurs.</p> <p><b><u>Step 2:</u></b>  Submit an amendment application in <b>GoBusiness Licensing Portal</b>  (<a href="https://www.gobusiness.gov.sg/licences">https://www.gobusiness.gov.sg/licences</a>).</p>	No.

S/N	Type of Amendment	Process	Fees Payable?
3	<p><b>Duty to notify Registrar of change in circumstances</b> <b>(which <u>does not</u> involve updating information with ACRA)</b></p> <p>i. Change of other information <i>(Includes declarations relating to banking and credit card facilities, criminal investigations, bankruptcy)</i></p>	<p><b><u>Step 1:</u></b> Notify Registrar via “<b>Notification of Change of Particulars and Circumstances</b>” form (<a href="https://go.gov.sg/notify-acd">https://go.gov.sg/notify-acd</a>) <b>within 14 days after</b> the matter occurs.</p> <p><b><u>Step 2:</u></b> Submit an amendment application in <b>GoBusiness Licensing Portal</b> (<a href="https://www.gobusiness.gov.sg/licenses">https://www.gobusiness.gov.sg/licenses</a>).</p>	No.

S/N	Type of Amendment	Process	Fees Payable?
4	<p><b>Duty to notify Registrar of change in place of business (which does not involve updating information with ACRA)</b></p> <p>i. Change in place of business <i>(Relocation of existing outlet/ Addition of new outlet(s)/ Closing of outlet(s))</i></p>	<p><b><u>Step 1:</u></b> Notify Registrar via “<b>Notification of Change of Particulars and Circumstances</b>” form (<a href="https://go.gov.sg/notify-acd">https://go.gov.sg/notify-acd</a>) <b>at least 14 days before</b> starting to carry out any regulated activity at the new outlet (addition of new outlet) or before ceasing to carry out any regulated activity at the existing outlet (closing of outlet).</p> <p><b><u>Step 2:</u></b> Submit an amendment application in <b>GoBusiness Licensing Portal</b> (<a href="https://www.gobusiness.gov.sg/licences">https://www.gobusiness.gov.sg/licences</a>).</p> <p>Note: The amendment application form only allows registration commencement date for the new outlet to start 14 days after the date of submitting the form.</p>	<p>Registration fees for additional outlet(s) will be charged on a prorated basis based on the formulae <math>(C \times D) / 365 \times E</math>.</p> <p><u>Note:</u> <i>C is \$300. D is the period (in days) of the remainder of the period of the registered dealer’s registration. E is the number of additional outlet to add.</i></p> <p>For reduction in number of outlets, there is no refund of registration fees.</p>

**Question 3:**

**How do I file Cash Transaction Report ("CTR") and/or Suspicious Transaction Report ("STR")?**

**Answer:**

You need to register for the SONAR user account at <https://www.police.gov.sg/sonar> to file the CTR/STR online. Submit the CTR within 15 business days, and STR immediately.

**Question 4:**

**Can I use my own Customer Due Diligence ("CDD") form?**

**Answer:**

The sample CDD and various forms in the Guidelines are provided as a guide. You may develop or customize the form for your use.

**Question 5:**

**E.g. A customer buys gold/diamond jewellery of S\$25,000 and trades in some gold of S\$15,000. The final amount paid by customer is S\$10,000 in cash.**

**Do I need to file a Cash Transaction Report (CTR)?**

**Answer:**

A designated transaction refers to a transaction where payment exceeding S\$20,000 in value is received in cash or a cash equivalent.

In this case, the cash received is below the threshold of S\$20,000 cash requirement for filing of CTR, so there is no requirement to file a CTR.

## Myth 1

"It is *the government's* role to deal with ML/TF."

## FACT

A robust AML/CFT framework benefits Singapore. Regulated dealers act as the first line of defence against any ML/TF risks in your business and the PSMD sector at large.

## Myth 2

"I *must* do Customer Due Diligence (CDD) for *all* customers?"

## FACT

CDD is required for:

- 1) Designated transaction
- 2) Suspicion of ML/TF
- 3) Doubts on the veracity or adequacy of information from earlier CDD.

## Myth 3

"I *must* use commercial databases to screen customer?"

## FACT

You should perform screening against the lists of terrorist designation (from MHA website) and designated individuals and entities (from MAS website).

# FEEDBACK FORM

Please provide your feedback on the Induction Briefing at:

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

or scan the QR code:



If you have more questions, you may submit an online enquiry form at:

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

