

Circular No.: AMLD 15/2024

Date: 30 October 2024

To the Chief Executive Officers of all Financial Institutions

Dear Sir/Madam,

PUBLICATION OF SINGAPORE'S (I) NATIONAL ANTI-MONEY LAUNDERING (AML) STRATEGY, (II) LAW ENFORCEMENT STRATEGY TO COMBAT MONEY LAUNDERING (ML) (III) PROLIFERATION FINANCING NATIONAL RISK ASSESSMENT (PF NRA), (IV) VIRTUAL ASSETS RISK ASSESSMENT (VARA), (V) LEGAL PERSONS RISK ASSESSMENT (LPRA) AND (VI) LEGAL ARRANGEMENTS RISK ASSESSMENT (LARA)

1 The identification, assessment and understanding of risks underpin the effectiveness of Singapore's efforts in AML, countering the financing of terrorism (CFT) and counter-PF (CPF). As part of Singapore's efforts to keep pace with changing risks, trends and typologies, Singapore monitors our ML, Terrorism Financing (TF) and PF risks through close coordination across government agencies and in collaboration with the industry. On 30 October 2024, Singapore published the following risk assessments to support and enhance the industry's collective risk awareness:

- **PF NRA**, which updates¹ and deepens Singapore's PF risk understanding, taking into consideration observations by relevant Singapore authorities, international typologies and feedback from the private sector.
- **Thematic Risk Assessments of Legal Persons², Legal Arrangements and Virtual Assets³**, which complement Singapore's updated ML National Risk Assessment and TF National Risk Assessment earlier published on 20 June 2024 and 1 July 2024 respectively. These thematic risk assessments provide a more targeted and in-depth understanding of Singapore's key threats and vulnerabilities in these specific risk areas, and are particularly relevant to sectors that have been referenced in the reports.

¹ In 2018, the Monetary Authority of Singapore (MAS) published a guidance paper on ["Sound Practices to Counter Proliferation Financing"](#).

² The misuse of legal persons has been identified as a key risk area for Singapore since 2017, and the LPRA seeks to provide a consolidated view of these risks.

³ VARA seeks to provide a deeper update to the earlier risk assessment which MAS, in conjunction with relevant agencies in Singapore, conducted in 2019 (see MAS Notice PS-N02).

2 Financial Institutions (FIs) should take reference from Singapore's risk assessments, including the above, in your identification, assessment and understanding of ML/TF/PF risks at an enterprise-wide level. The enterprise-wide risk assessment should be approved by senior management, and enable a deeper understanding of the overall vulnerability of your FI to ML/TF/PF risks and form the basis for your FI's implementation of relevant risk-focused AML/CFT/CPF controls and mitigation measures.

3 In conducting the enterprise-wide risk assessment, FIs should incorporate relevant findings from the risk assessments that have been published, including the abovementioned risk assessments and the updated ML and TF National Risk Assessments published on 20 June 2024 and 1 July 2024 respectively. FIs should take into account the relevant ML/TF/PF threats and higher-risk sectors identified within to assess the effectiveness of your FI's AML/CFT/CPF controls and ongoing monitoring of customers' accounts and transactions.

Singapore's National AML Strategy and Law Enforcement Strategy to Combat ML

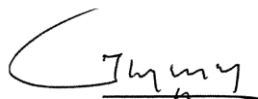
4 Taking into account Singapore's ML NRA, other risk assessments and reviews, Singapore has also on 30 October 2024, published the National AML Strategy which sets out the strategic approach to address ML risks, and will guide Singapore's risk-targeted actions to combat ML amidst rapidly changing risks, trends and criminal typologies.

5 The Law Enforcement Strategy to Combat ML, also published on 30 October 2024, supports the National AML Strategy, and articulates the shared commitment by law enforcement agencies to combat ML and addresses the key money laundering threats identified in the 2024 ML NRA.

6 The links to Singapore's risk assessments, National AML Strategy and Law Enforcement Strategy to Combat ML can be found below:

- Singapore's Risk Assessments: [Link](#)
- National AML Strategy: [Link](#)
- Law Enforcement Strategy: [Link](#)

Yours faithfully



(via MASNET/email)
THONG LENG YENG
EXECUTIVE DIRECTOR
ANTI-MONEY LAUNDERING DEPARTMENT