

MAS Issues Enforcement Actions to Reinforce Compliance Expectations

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In the first week of July, the Monetary Authority of Singapore (MAS) reinforced its commitment to regulatory integrity with two significant enforcement announcements.

These actions reflect MAS's continued focus on ensuring that financial institutions (FIs) maintain robust compliance frameworks and meet their obligations under Singapore's regulatory regime. The enforcement measures highlight the importance of timely reporting, adherence to licensing conditions, and the effective implementation of anti-money laundering and countering the financing of terrorism (AML/CFT) controls. They also underscore MAS's expectation that boards and senior management exercise meaningful oversight over compliance and risk management functions.

The announcements include the revocation of a Capital Markets Services (CMS) licence and enforcement action against multiple financial institutions. Details of these actions are outlined below:

a. Licence Revoked: Xen Capital Asia Pte Ltd

On 3 July 2025, MAS revoked the Capital Markets Services licence of Xen Capital Asia Pte Ltd (XCAPL). The MAS also reprimanded its executive director for multiple breaches of regulatory requirements. XCAPL had on multiple occasions failed to submit financial returns to the MAS despite repeated reminders, failed to notify the MAS on changes in personnel and did not meet the minimum licensing requirements of having at least two full-time Appointed Representatives.

View the enforcement report against XCAPL here.

b. AML/CFT Sanctions: Nine Financial Institutions

On 4 July 2025, MAS announced details of enforcement action on nine financial institutions following thematic inspections and supervisory reviews surrounding AML/CFT controls. The nine FIs included six banks, two CMS licence holders and one licensed trust company. These firms were fined S\$27.45m collectively for breaches of AML/CFT-related controls. Whilst the firms had established AML/CFT policies and procedures internally, the breaches arose out of poor/inconsistent implementation. Shortcomings were noted in the areas of customer risk assessment, establishing and corroborating source of wealth of high-risk customers, inadequate review of unusual transactions, etc.

In addition, the MAS took firm action against the directors, senior management and representatives of these firms for failure to ensure compliance in varying degrees. In particular, four members of the senior management team of Blue Ocean Invest Pte. Ltd were issued Prohibition Orders (PO) ranging from three to six years each.

View the enforcement report against the nine FIs here.

Key Takeaways: What This Means for the Industry

The recent enforcement actions reflect the MAS's continued commitment to upholding high standards of regulatory compliance and zero tolerance approach towards breaches, particularly in areas related to AML/CFT controls and governance failures.

For FIs and their Senior Management, this serves as a timely reminder that having policies and procedures in place is not sufficient. Effective implementation, consistent oversight, and ongoing review are essential to meeting regulatory expectations and safeguarding your firm's compliance infrastructure. MAS has and will continue to take firm action against directors and senior managers who do not properly discharge their duties as demonstrated in the enforcement report.

In light of these developments FIs should implement the right policies, procedures and controls to effectively identify associated risks and safeguard the firm's reputation, including:

- Strengthen governance and compliance oversight, ensuring senior management and boards are engaged and informed
- Review and enhance AML/CFT frameworks, with a focus on customer risk assessments, source of wealth corroboration, and effective monitoring of unusual transactions
- Ensure timely and accurate regulatory reporting, such as for licensing conditions and change notifications
- Foster a culture of compliance across all levels of the organisation, with regular training, escalation
 protocols, and well-defined internal controls to support compliance oversight.

These enforcement actions signal that the MAS will continue to act decisively where firms fall short of their regulatory obligations. Fls that invest in robust compliance framework and strong internal controls will be better positioned to manage regulatory risk and strengthen operational resilience.

How Waystone Can Help

The latest MAS enforcement actions highlight critical weaknesses in governance, controls, and senior management accountability in Fls. With extensive experience in regulatory advisory and compliance solutions, Waystone is well-positioned to help firms overcome these challenges. We provide support in the following ways:

1. AML/CFT Implementation and Reviews

Waystone delivers comprehensive support to enhance your AML/CFT compliance programme through the following key services:

- Policies and Procedures
- Customer due diligence (CDD) procedures
- SOW/SOF corroboration procedures
- Customer risk assessment
- Name screening for sanctions and adverse news
- Enhanced due diligence (EDD) protocols
- Ongoing review and periodic CDD refreshes

2. Senior Management and Board Training

We offer customised training for Board of Directors, Compliance Officers covering:

- Oversight and responsibility
- Governance and oversight obligations
- Risk Management
- MAS Notifications and Approvals
- Licensing and Business Conduct

Our team of <u>APAC Compliance Solutions</u> professionals is highly experienced in AML/CFT compliance and regulation requirements. We recognise the importance of helping our clients to meet these obligations with confidence and offer expert guidance in developing and integrating fit-for-purpose AML/CFT frameworks aligned with jurisdictional regulations and industry best practices.

We continuously monitor the latest regulatory and enforcement trends, enabling our team to promptly address your queries and assist with any compliance concerns raised by prospective investors.

If you would like to discuss or have questions on any of the themes raised in this article or to learn more about our services, please reach out to your usual Waystone representative or contact us below.

