Quarta etapa: a avaliação independente

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A avaliação independente é um relatório elaborado por um terceiro, em geral uma firma de auditoria ou uma consultoria especializada, sobre a adequação da estrutura de PLD/FT (AML/CFT) do requerente e, no caso de requerentes de DPT (digital payment token, token de pagamento digital), de seus arranjos de risco tecnológico e de custódia. A Monetary Authority of Singapore (MAS) define o escopo e espera que o avaliador teste a estrutura em funcionamento, e não apenas no papel.[1] O relatório deve ser apresentado antes da aprovação de princípio, o que faz do seu cronograma a fonte mais comum de atraso. Uma avaliação encomendada quando as políticas já estão finalizadas leva de dois a quatro meses. Uma avaliação encomendada antes da finalização das políticas produz um relatório com ressalvas e precisa ser repetida.

Notas

1. MAS, Guidelines on Licensing for Payment Service Providers (PS-G01), seção sobre a avaliação independente da estrutura de AML/CFT dos requerentes, e o escopo ampliado para requerentes de DPT após as alterações de 2024. ↩

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