The problem stated

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The typical client of a Swiss–Singapore digital-asset practice is a group. A Zug AG or GmbH holds the protocol, the treasury or the custody business and is affiliated to a Swiss self-regulatory organisation (SRO) under the Anti-Money Laundering Act (AMLA; GwG). A Singapore Pte Ltd holds a major payment institution (MPI) licence under the PSA for the exchange or payments business serving Asian customers. A holding company sits above both, in one of the two countries or in a third. The compliance officer of such a group faces two regulators, two notices, two sets of thresholds, two retention periods, two reporting regimes and two data-protection laws, with a single customer base that expects to move between the entities as if they were one. This chapter sets out how to build one AML programme that satisfies both regulators, where the two regimes cannot be reconciled, and how the group should handle the points of friction.

The Swiss side of each comparison is given here only to the extent needed. Part F is the authority for Swiss law and should be read alongside this chapter.

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