Reforms after 2023

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The case of 2023 as a catalyst

The arrests of 15 August 2023 and the seizure of assets worth more than three billion dollars, examined in Chapter E.VI, came shortly before the on-site visit of the FATF. They exposed weaknesses at several points of the system at once. The national risk assessment of 2024 described the case as an illustration of the threat from foreign organised crime. Several accused persons were convicted of laundering proceeds suspected to derive from illegal online gambling run by foreign criminal groups. Part of the money sat in Singapore bank accounts, while the rest had been turned into real estate, cars, handbags and collectibles. Corporate service providers had incorporated the companies through which the suspects held assets, estate agents had handled their property purchases and dealers in precious stones and metals had taken their cash.

The government set up an Inter-Ministerial Committee to review the whole system, which the FATF later cited as evidence of political commitment.[1] Chapter E.VI describes the committee and its changes to the laws on casinos, precious metals dealers and corporate service providers. This chapter concentrates on the general framework.

The legislative programme

Three statutes reshaped the CDSA in less than three years. The amending Act of 2023, in force since February 2024, introduced rash and negligent laundering and the money mule offence. The Anti-Money Laundering and Other Matters Act of 2024, in force since November 2024, eased the proof of foreign predicates, created the Third Schedule and allowed sector supervisors to see the reports filed by their firms. The amending Act of 2025, in force since 30 December 2025, added caning for those who launder the proceeds of serious scams. The legislation of 2024 also enabled the Inland Revenue Authority and Singapore Customs to share tax and trade data with STRO. STRO can thus compare a company's declared turnover and its declared imports with the flows through its bank accounts, which opens a promising route to detecting trade-based laundering.

Beside these statutes stand changes outside the CDSA. Since 2023 it has been an offence to disclose or deal in Singpass credentials, the national digital identity, to facilitate crime. The Online Criminal Harms Act 2023 gave the government powers to issue directions against online activity linked to money laundering and its predicates. A licensing regime for operators in the free trade zones gave Customs a better view of goods transhipped through Singapore.[2]

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COSMIC: information sharing between banks

The most innovative reform concerns the sharing of information between banks. Criminal networks exploit the fact that each bank sees only its own customers. A company that seems unremarkable at one bank may be part of a network spread over several others. On 1 April 2024 MAS launched COSMIC, a platform that it developed with six major banks: DBS, OCBC, UOB, Standard Chartered, Citibank and HSBC. Participating banks may share information on customers whose profile or behaviour displays defined combinations of red flags. The first phase concentrates on three risks: the misuse of legal persons, the misuse of trade finance and proliferation financing.[3]

The legal basis was created by the Financial Services and Markets (Amendment) Act 2023, which established the system under section 28N(1) of the Financial Services and Markets Act 2022, and by regulations of 2024 on an information-sharing scheme for prescribed financial institutions. The safeguards are essential. A customer who has done nothing wrong but has been flagged by one bank could otherwise find himself shut out of the whole banking system. MAS therefore planned an initial phase of two years, after which it would evaluate whether to extend the platform to more risks and institutions. In August 2026 the press reported that MAS would bring more banks onto the platform and widen the risks it covers over the next two years. Information shared had led to additional reports and to the closure of a significant number of suspicious accounts.[4]

The National AML Strategy

On 30 October 2024 the government published a National Anti-Money Laundering Strategy, following the national risk assessment of the same year. The strategy rests on three pillars, prevent, detect and enforce, supported by three building blocks. These are coordination across society, the legal and regulatory framework and international cooperation. The risk assessment identified fraud, especially cyber-enabled fraud, organised crime, corruption, tax crimes and trade-based laundering as the key threats. It assessed banking, including wealth management, as the sector posing the highest risk, and corporate service providers as the highest-risk non-financial sector.

The FATF found the strategy too general. More than half of its actions began with the word “continue” and were not specifically linked to the findings of the risk assessment.[5] The criticism reflects a difference of style. Singapore prefers a dynamic approach that reacts quickly to new risks through committees of senior officials, while the FATF expects documented priorities, deliverables and timelines. The report of 2026 adds pressure to formalise what has so far been managed informally.

Open tasks

The report of 2026 leaves Singapore with a list of tasks. They include more prosecutions of professional launderers, intermediaries and legal persons, and higher penalties both in court and in supervision. Beneficial ownership information must be verified, especially for trusts and foreign companies. Cooperation abroad needs to make greater use of formal channels: Singapore received 988 requests for mutual legal assistance in the review period but sent about a quarter as many.[6] These tasks

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call for resources, data and a willingness to pursue long and difficult cases against well-advised defendants.

Notes

1. Inter-Ministerial Committee on Anti-Money Laundering, *Report*, October 2024: "On 15 August 2023, ten suspects were arrested in a series of simultaneous raids"; *Money Laundering National Risk Assessment Singapore 2024*, para. 3.6 ("over S$3 billion worth of seized and prohibited assets"); FATF and APG, *Mutual Evaluation Report of Singapore*, May 2026, Executive Summary, Key Findings (b): Singapore "set up an inter-ministerial committee to review and improve Singapore's AML/CFT/CPF system".
2. CDSA, amendment notes to ss 45, 51, 54, 55A and 56 (Act 15 of 2023 wef 08/02/2024; Act 24 of 2024 wef 14/11/2024; Act 21 of 2025 wef 30/12/2025) (LawPlayer SG reproduction, accessed November 2026); Monetary Authority of Singapore, *National Anti-Money Laundering Strategy*, 30 October 2024, para. 6.4; Monetary Authority of Singapore, *National Anti-Money Laundering Strategy*, 30 October 2024, Table 1, entries on the Computer Misuse Act (2023) and the Online Criminal Harms Act (2023); Monetary Authority of Singapore, *National Anti-Money Laundering Strategy*, 30 October 2024, Table 1, entry on the Free Trade Zones Act and the Regulation of Imports and Exports Act (2023).
3. Monetary Authority of Singapore, "COSMIC" (mas.gov.sg, accessed November 2026): "On 1st April 2024, MAS launched a digital platform, COSMIC"; participants DBS, OCBC, UOB, SCB, Citibank and HSBC; Monetary Authority of Singapore, *National Anti-Money Laundering Strategy*, 30 October 2024, para. 6.9.
4. Monetary Authority of Singapore, "COSMIC" (mas.gov.sg, accessed November 2026), related links to the Financial Services and Markets (Amendment) Act 2023 and the Financial Services and Markets (Information Sharing Scheme for Prescribed Financial Institutions) Regulations 2024; MAS Notice 626, para. 2.1, definition of "COSMIC" ("the electronic information sharing system established under section 28N(1) of the FSM Act"); Monetary Authority of Singapore, *National Anti-Money Laundering Strategy*, 30 October 2024, para. 6.12; *Fintech News Singapore*, "MAS to Add More Banks to COSMIC Financial Crime Sharing Platform", 6 August 2026 (fintechnews.sg, accessed November 2026): MAS "will bring more banks onto COSMIC" and is "broadening the financial crime risks covered … over the next two years"; shared information led banks to file additional STRs and to close "a significant number of suspicious customer accounts".
5. FATF and APG, *Mutual Evaluation Report of Singapore*, May 2026, Box 1.1 ("Singapore published the National AML Strategy on 30 October 2024"); Monetary Authority of Singapore, "National Anti-Money Laundering Strategy" (mas.gov.sg, accessed November 2026); *Money Laundering National Risk Assessment Singapore 2024*, para. 3.2; FATF and APG, *Mutual Evaluation Report of Singapore*, May 2026, para. 120.
6. FATF and APG, *Mutual Evaluation Report of Singapore*, May 2026, Executive Summary, paras 10–11.

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