

**Changes to Trustees' Anti Money Laundering / Countering the Financing of Terrorism  
Obligations under the Trustees Act 1967**

Dear Sir/Mdm,

1. This note updates on the amendments to Part 7 of the Trustees Act 1967 and the Trustees (Transparency and Effective Control) Regulations 2017, in respect of trustees' Anti Money Laundering and Countering the Financing of Terrorism ("AML/CFT") obligations. We encourage you to share the updates with your clients who are trustees.

**A. Trustees and the relevant AML/CFT Obligations**

2. An express trust is formed when a settlor intentionally transfers property to a trustee, for the trustee to hold on trust for beneficiaries. The trustee is the legal owner of the property held under the trust, while the beneficiaries have a beneficial interest and are entitled to benefit from the trust property.
3. Trustees are required to comply with rules relating to AML/CFT. The two main sets of AML/CFT rules for trustees are:
  - (a) [MAS' Notice TCA-N03 on the Prevention of Money Laundering and Countering the Financing of Terrorism](#) ("MAS Notice TCA-N03"): Applicable to Licensed Trust Companies ("LTCs")<sup>1</sup> and Private Trust Companies ("PTCs")<sup>2</sup>; and
  - (b) [Part 7 of the Trustees Act 1967](#) ("Trustees Act") and [Trustees \(Transparency and Effective Control\) Regulations 2017](#) ("TTEC Regulations"): Applicable to most other trustees who are not LTCs and PTCs, including non-professional trustees ("Residual Trustees").<sup>3</sup>
4. Part 7 of the Trustees Act and the TTEC Regulations were recently amended to update the trustees' AML/CFT obligations in relation to the Residual Trustees and they come into force on 20 June 2025. The amendments may be found in:
  - (a) [Part 3 of the Mutual Assistance in Criminal Matters \(Amendment\) and Other Matters Act 2024](#); and
  - (b) Trustees (Transparency and Effective Control) (Amendment) Regulations 2025.

---

<sup>1</sup> In Singapore, persons who carry on trust business have to obtain a trust business licence under the Trust Companies Act 2005, unless specifically exempted. Companies which obtain a trust business licence are known as Licensed Trust Companies ("LTCs").

<sup>2</sup> Private Trust Companies ("PTCs") are companies established to act as a trustee to a trust (or a number of trusts), where the settlor or settlors are connected by blood or legal adoption. The beneficiaries of the trusts must also be connected to the settlor by familial ties. PTCs cannot provide or solicit trust business to the public. Although PTCs are exempted from obtaining a trust business licence, they still have to comply with MAS Notice TCA-N03.

<sup>3</sup> Residual trusts are trusts in respect of which the trustee is **not** a LTC, PTC, a licensed bank or merchant bank, a holder of a capital markets services licence; an approved trustee of a CIS; or certain government agencies, such as the Public Trustee and the Central Provident Fund Board.

5. The note in the **Annex** summarises the updates to the trustees' AML/CFT obligations under Part 7 of the Trustees Act and the TTEC Regulations, in relation to Residual Trustees.

**B. Call for Action concerning the Trustees' Obligations**

6. Your organisation may, in the course of forming a business relationship<sup>4</sup> or entering into a transaction with a client, come into contact with Residual Trustees to whom the obligations in the **Annex** apply. We encourage your organisation to:
- (a) Share the note in the **Annex** with Residual Trustees that your organisation may come into contact with; and
  - (b) Report suspected breach(es) of the obligations in Part 7 of the Trustees Act and the TTEC Regulations to <https://eservices.mlaw.gov.sg/enquiry>.<sup>5</sup>
7. You are also reminded to file a Suspicious Transaction Report<sup>6</sup> if your organisation:
- (a) Knows or has reasonable grounds to suspect that any property represents proceeds of, or was or is intended to be used in connection with drug dealing or criminal conduct;<sup>7</sup> or
  - (b) Has information on any transaction (or proposed transaction) in respect of property belonging to terrorists, or any information in respect of terrorism financing.<sup>8</sup>
8. Should you require any assistance, please do not hesitate to contact us.

Query	Contact
Matters related to SONAR <sup>9</sup> account, such as creation of new SONAR account or access to existing SONAR account	Email your queries to <a href="mailto:SPF_STRO_IT_Team@spf.gov.sg">SPF_STRO_IT_Team@spf.gov.sg</a>
Filing of a Suspicious Transaction Report	Email your queries to <a href="mailto:SPF_STRO_IT_Team@spf.gov.sg">SPF_STRO_IT_Team@spf.gov.sg</a>
All other matters	MinLaw hotline 1800 2255 529 from Monday to Friday, 8.30am to 5.00pm (Closed on Weekends & Public Holidays)  Online enquiry form on the MinLaw website at <a href="https://www.go.gov.sg/contactminlaw">https://www.go.gov.sg/contactminlaw</a>

<sup>4</sup> "Business Relationships" are defined broadly to include day-to-day transactions, and other types of transactions which may be formed in the course of the organisation's business.

<sup>5</sup> If the suspected breach involves a LTC or PTC breaching its obligations in MAS Notice TCA-N03, please make a report at [www.mas.gov.sg/consumerfeedback-form/](http://www.mas.gov.sg/consumerfeedback-form/) instead.

<sup>6</sup> Please refer to the Singapore Police Force's website at: <https://www.police.gov.sg/Advisories/Crime/Commercial-Crimes/Suspicious-Transaction-Reporting-Office> for details on filing a Suspicious Transaction Report.

<sup>7</sup> Section 45(1) of the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992

<sup>8</sup> Sections 8 and 10 of the Terrorism (Suppression of Financing) Act 2022.

<sup>9</sup> Suspicious Transaction Reporting Office (STRO); STRO Online Notices and Reporting Platform (SONAR); Please refer to the Singapore Police Force's Website at: <https://www.police.gov.sg/sonar>.

9. Thank you.

Ministry of Law  
13 June 2025

## **ANNEX**

**Changes to Trustees' obligations under Part 7 of the Trustees Act 1967 and  
the Trustees (Transparency and Effective Control) Regulations 2017**

**A. Background**

1. Singapore is a member of the Financial Action Task Force (“**FATF**”), which establishes international standards for Anti-Money Laundering, Countering the Financing of Terrorism and Proliferation Financing (“**AML/CFT**”). In line with FATF’s Recommendation 25 on Beneficial Ownership and Transparency of Legal Arrangements (“**R.25**”)<sup>1</sup> and related guidance (among others), trustees are required to comply with various AML/CFT related obligations under Part 7 of the Trustees Act 1967 (“**Trustees Act**”) and the Trustees (Transparency and Effective Control) Regulations 2017 (“**TTEC Regulations**”).
2. Amendments to Part 7 of the Trustees Act and the TTEC Regulations will be coming into force on 20 June 2025 (collectively, the “**June Amendments**”).<sup>2</sup> A summary of the trustees’ obligations, as well as the June Amendments are detailed in **Section B**.

**B. Trustees’ AML/CFT obligations under the Trustees Act and the TTEC Regulations**

3. Part 7 of the Trustees Act and the TTEC Regulations apply to any express trust:<sup>3</sup>
  - (a) That is governed by the law of Singapore;
  - (b) That is administered in Singapore; or
  - (c) In respect of which any of the trustees is resident in Singapore,except for certain exceptions prescribed in the TTEC Regulations.
4. Under the Trustees Act and the TTEC Regulations, trustees are required to:
  - (a) Obtain and verify information of relevant trust parties (i.e. all settlors, trustees, protectors, beneficiaries, and persons who have any power over the disposition of the trust);<sup>4</sup>
  - (b) Obtain and verify information about the effective controllers of relevant trust parties;<sup>5</sup>

---

<sup>1</sup>Key features of Recommendation 25 are: countries are required to conduct risk assessment of legal arrangements (including express trusts); trustees are required to collect adequate, accurate and up-to-date beneficial ownership information regarding the trust and its relevant parties; information collected must be accessible in a timely manner by competent authorities.

<sup>2</sup> See Part 3 of the Mutual Assistance in Criminal Matters (Amendment) and Other Matters Act 2024; and the Trustees (Transparency and Effective Control) (Amendment) Regulations 2025.

<sup>3</sup> Section 84 of the Trustees Act.

<sup>4</sup> Reg 4 of the TTEC Regulations; please refer to Reg 4 for the timeframe in which to obtain and verify the information.

<sup>5</sup> Reg 5 of the TTEC Regulations; please refer to Reg 5 for the timeframe in which to obtain and verify the information.

- (c) Obtain information about persons appointed or engaged as a service supplier to the relevant trust (i.e. an agent of, or a service provider to, the relevant trust including any investment adviser or manager, accountant or tax adviser);<sup>6</sup>
- (d) Update information in (a) – (c) in a timely manner and maintain records for at least 5 years after the trustee ceases to be a trustee of the relevant trust;<sup>7</sup>
- (e) Inform certain “specified persons” that they are acting for a relevant trust before forming a business relationship, or entering a transaction of more than \$20,000 (whether the transaction is carried out in a single operation or in multiple linked operations) with that “specified person”. “Specified persons” include financial institutions, licensed estate agents, regulated precious stone and metal dealers, pawnbrokers, accountants and lawyers;<sup>8</sup> and
- (f) Keep accounting records.<sup>9</sup>

5. Following the June Amendments:

- (a) Trustees will now have to obtain and verify certain information relating to the administration of the trust.<sup>10</sup> This includes:
  - (i) The full name of the trust;
  - (ii) The date the trust was set up;
  - (iii) The tax reference number of the trust (if any), and the country to which it relates;
  - (iv) The place where the trust is administered;
  - (v) The governing law of the trust; and
  - (vi) The purpose for which the trust was set up.
- (b) The scope of relevant trust parties has been expanded. With this change, trustees will now need to obtain and verify information of (i) settlors, (ii) trustees, (iii) protectors, (iv) beneficiaries, (v) *class of beneficiaries*, (vi) *objects of a power*, and (vii) persons who have any power over the disposition of the trust (the new relevant trust parties are italicised);<sup>11</sup>
- (c) The information that trustees will need to obtain and verify in respect of relevant trust parties (see (b) above) has also been expanded. The additional information that trustees need to obtain and verify include:<sup>12</sup>
  - (i) For relevant trust parties that are individuals, the place of birth; and
  - (ii) The role of the relevant trust party in relation to the trust (e.g. whether the relevant trust party is a settlor, trustee, protector, etc.);

---

<sup>6</sup> Reg 6 of the TTEC Regulations; please refer to Reg 6 for the timeframe in which to obtain the information.

<sup>7</sup> Reg 7 of the TTEC Regulations.

<sup>8</sup> Reg 8 of the TTEC Regulations.

<sup>9</sup> Reg 9 of the TTEC Regulations.

<sup>10</sup> New Reg 3A of the TTEC Regulations.

<sup>11</sup> Amended Reg 4 of the TTEC Regulations.

<sup>12</sup> Amended Reg 4 of the TTEC Regulations.

- (d) Disclose that they are acting for a relevant trust (see para 4(e) above) to a wider group of specified persons, which now includes developers of residential and non-residential properties;<sup>13</sup> and
  - (e) Retain certain documents relating to a trust, including the trust instrument and any letter of wishes.<sup>14</sup>
6. The June Amendments also create a new Commissioner of Trust Enforcement (“CTE”), who is empowered to investigate any breaches of the obligations under Part 7 of the Trustees Act and the TTEC Regulations.<sup>15</sup>
  7. The penalty for such an offence has been increased from a fine not exceeding \$1,000 upon conviction, to a fine not exceeding \$25,000 upon conviction.<sup>16</sup> The CTE is empowered to issue composition of a sum not exceeding one half of the maximum fine (i.e., \$12,500).<sup>17</sup>
  8. Any person who produces false information to the CTE or who obstructs the CTE’s investigation is also guilty of an offence and shall be liable on conviction to a fine not exceeding \$25,000 or to imprisonment for a term not exceeding 2 years or to both.<sup>18</sup>
  9. Further details can be found in Part 7 of the Trustees Act and the TTEC Regulations (accessible at <https://sso.agc.gov.sg/Act/TA1967> and <https://sso.agc.gov.sg/Act/TA1967-S151-2017> respectively). You may also wish to refer to MinLaw’s website on Trusts and Trust Like Arrangements in Singapore (accessible at [www.mlaw.gov.sg/trusts/express-trusts](http://www.mlaw.gov.sg/trusts/express-trusts)).
  10. Please note that laws and regulations are subject to change. It is advisable for trustees to stay abreast of any changes to their obligations.

Ministry of Law

13 June 2025

---

<sup>13</sup> Amended Reg 8 of the TTEC Regulations.

<sup>14</sup> New Reg 8A of the TTEC Regulations.

<sup>15</sup> New section 84A – 84P of the TTEC Regulations.

<sup>16</sup> Reg 10 of the TTEC Regulations.

<sup>17</sup> New section 84P of the Trustees Act.

<sup>18</sup> New sections 84L and 84M of the Trustees Act.