# Cuarta fase: la evaluación independiente

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La evaluación independiente es un informe de un tercero externo, normalmente una firma de auditoría o una consultora especializada, sobre la idoneidad del marco AML/CFT (prevención del blanqueo de capitales y de la financiación del terrorismo) del solicitante y, en el caso de los solicitantes DPT, de sus disposiciones en materia de riesgo tecnológico y custodia. La Monetary Authority of Singapore (MAS, la autoridad monetaria y supervisora financiera) determina el alcance y espera que el evaluador compruebe el marco en funcionamiento y no solo sobre el papel.[1] El informe debe presentarse antes de la aprobación de principio, por lo que su calendario es la causa más frecuente de retraso. Una evaluación encargada cuando las políticas son definitivas lleva de dos a cuatro meses. Una evaluación encargada antes de que las políticas sean definitivas da lugar a un informe con salvedades y debe repetirse.

## Notas

1. MAS, Guidelines on Licensing for Payment Service Providers (PS-G01), apartado sobre la evaluación independiente del marco AML/CFT de los

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solicitantes, y el alcance ampliado para los solicitantes DPT tras las modificaciones de 2024. ↩

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