



MEDIA RELEASE

25 November 2024

CCCS Issues Proposed Infringement Decision Against Remittance Service Providers for Unlawful Exchange of Price Information

1. The Competition and Consumer Commission of Singapore (“**CCCS**”) has today issued a Proposed Infringement Decision (“**PID**”) ¹ against the following undertakings for infringing section 34 of the Competition Act 2004 (the “**Act**”) ² by engaging in anti-competitive coordination to exchange information on each other’s outward remittance rates³ for the Chinese Yuan (or Ren Min Bi) (“**RMB**”) (the “**Information Exchange Conduct**”):
 - a. ZGR Global Pte. Ltd. (formerly known as Zhongguo Remittance Pte. Ltd.)
 - b. Hanshan Money Express Pte. Ltd.(each a “**Party**” and collectively, the “**Parties**”).
2. CCCS found that the Information Exchange Conduct had occurred for more than six years, from at least 1 January 2016 to 22 February 2022. The Parties exchanged information on each other’s outward remittance rates for RMB instead of determining their rates independently. This removed the risks of price competition and significantly reduced the uncertainty between the Parties about the prevailing outward RMB remittance rate each was offering to customers at any given time. CCCS considers the Information Exchange Conduct to be, by

¹ The PID is a legal notice that outlines the facts used by CCCS to make its assessment and the reasons for reaching the proposed decision. It is issued to the Parties confidentially to assist them to make representations and provide any other information in support of their representations for CCCS’s consideration.

² Section 34 of the Act prohibits any agreements between undertakings, decisions by associations of undertakings or concerted practices which have as their object or effect the prevention, restriction or distortion of competition within Singapore. An undertaking means any person, being an individual, a body corporate, an unincorporated body of persons or any other entity, capable of carrying on commercial or economic activities relating to goods or services.

³ Outward remittance rates refer to the amount of foreign currency exchanged and remitted overseas per local currency paid. For example, an outward remittance rate of “5.00” for a RMB remittance, means that 5 RMB will be remitted to the target overseas bank account for each Singapore dollar paid to the remittance service provider.

its very nature, restrictive of competition, as it reduces the competitive pressures on competing providers to offer competitive rates to consumers⁴.

3. The Parties have the opportunity to make representations to CCCS following the issuance of the PID. CCCS will carefully consider the representations, as well as all available information and evidence, before making its decision.

- End -

About The Competition & Consumer Commission of Singapore (CCCS)

The Competition and Consumer Commission of Singapore (“**CCCS**”) is a statutory board of the Ministry of Trade and Industry. CCCS administers and enforces the Competition Act 2004 which empowers CCCS to investigate and adjudicate anti-competitive activities, issue directions to stop or prevent anti-competitive activities and impose financial penalties. CCCS is also the administering agency of the Consumer Protection (Fair Trading) Act 2003 or CPFTA which protects consumers against unfair trade practices in Singapore. Our mission is to make markets work well to create opportunities and choices for businesses and consumers in Singapore.

For more information, please visit www.cccs.gov.sg.

For media clarifications, please contact:

Ms. Grace Suen
Senior Assistant Director
Competition and Consumer Commission of Singapore
Email: grace_suen@cccs.gov.sg
DID: 6325 8216

Ms. Ashley Tuen
Senior Executive
Competition and Consumer Commission of Singapore
Email: ashley_tuen@cccs.gov.sg
DID: 6991 7059

⁴ CCCS’s investigation into the Information Exchange Conduct was independently conducted in relation to anti-competitive conduct under the Act, and unrelated to any other investigations by public agencies into the remittance industry.

Appendix - CCCS's Leniency Programme

CCCS's Leniency Programme affords lenient treatment to businesses that are part of a cartel agreement or concerted practice (or trade associations that participate in or facilitate cartels), when they come forward to CCCS with information on their cartel activities.

Due to the secret nature of cartels, businesses participating or which have participated in them are given an incentive to come forward and inform CCCS of the cartel's activities. The policy of granting lenient treatment to these businesses which cooperate with CCCS outweighs the policy objectives of imposing financial penalties on such cartel participants.

Where eligible for lenient treatment, businesses can be granted total immunity or be granted a reduction of up to either 100% or 50% in the level of financial penalties, depending on whether CCCS has already begun an investigation and the timing of the leniency application. For more information, please refer to the *CCCS Guidelines on Lenient Treatment for Undertakings Coming Forward with Information on Cartel Activity 2016* which can be found on CCCS's website [here](#).