# 新加坡的制裁立场

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新加坡的制裁政策与瑞士有所不同，双中心合规计划必须从第一天起就将这一点纳入考量。正如第F部分第VII章所述，瑞士根据《瑞士禁运法》实施联合国制裁，并自2022年起几乎全面向欧盟的自主制裁看齐，尤其是针对俄罗斯和白俄罗斯的制裁。新加坡将实施联合国制裁视为一项国际法义务，除此之外一直避免采取自主制裁，唯一的例外是2022年3月针对俄罗斯入侵乌克兰所采取的措施。新加坡并不照搬美国、欧盟或英国的制裁。不过，由于持有美元敞口，新加坡的金融机构在实践中仍遵守美国的制裁制度。由此形成一个三层结构：具有约束力的联合国措施、针对俄罗斯的措施，以及OFAC带来的商业现实。

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