2022年3月的对俄措施

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2022年3月5日，新加坡宣布对俄罗斯实施制裁，以回应其入侵乌克兰，这是新加坡数十年来首次在没有安理会授权的情况下采取行动。新加坡外交部解释称，之所以偏离惯常做法，是因为一个主权国家遭到无端入侵，而安理会又因俄罗斯的否决而陷于瘫痪。[1] MAS实施的金融措施禁止金融机构与四家指名的俄罗斯银行（VTB、VEB.RF、Promsvyazbank和Bank Rossiya）进行交易。这些措施还禁止参与被指定俄罗斯政府关联实体新证券的发行或交易，以及向其提供融资。最后，这些措施禁止提供有助于俄罗斯政府或中央银行筹集资金的金融服务。

与本文最相关的是，这些措施明确禁止数字支付代币交易。MAS指示金融机构，包括DPT服务提供商，不得协助进行可能被用于规避其他措施的DPT交易。实践中，这意味着拦截与被指定银行和实体有关的交易，并将涉及俄罗斯的DPT资金流视为较高风险。[2] DPT禁令在当时并不多见，表明MAS从对俄措施一开始就将加密资产视为一种规避渠道。在出口管制方面，新加坡关税局根据《2002年战略物资（管制）法》对军用及军民两用物资和某些电子产品实施了限制。

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新加坡的措施比欧盟、英国或美国的制裁方案范围更窄。新加坡没有冻结寡头的资产，没有像欧盟在2022年10月那样全面禁止向俄罗斯居民提供加密服务，也没有采用石油价格上限。居住在新加坡、与被指定实体没有关联的俄罗斯公民，在接受强化尽职调查的前提下，可以合法地在新加坡持牌机构持有DPT账户。如果瑞士条例中的加密服务禁令适用于此人，该持牌机构的瑞士关联公司则不得为其提供服务（参见第F部分第VII章）。这种不对称是最能说明问题的例子之一：双中心集团若没有针对各司法管辖区的专门层级，就无法执行单一的客户接纳政策。

注释

1. Ministry of Foreign Affairs, Singapore，2022年2月28日声明及2022年3月5日宣布对俄罗斯实施制裁和限制措施的新闻稿；MAS，2022年3月5日媒体发布，"MAS Imposes Financial Measures Against Russia"。 ↩
2. MAS，2022年3月5日媒体发布，以及随附的致金融机构的对俄金融措施公告，包括禁止协助进行可能规避相关措施的数字支付代币交易。 ↩

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