地缘政治：在美国与中国之间：实际影响

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

对银行、资产管理机构和贸易商的影响

新加坡的银行和资产管理机构应将地缘政治风险视为其业务的长期特征。制裁筛查必须涵盖联合国、新加坡、美国、欧盟和英国的名单，并在名单之间存在差异时有明确的政策可循。贸易融资需要仔细核查原产地和最终用途，电子产品、半导体和军民两用物品尤其如此。信贷决定应考虑关税风险敞口、供应链集中度以及交易对手遭受制裁的可能性。拥有美国投资者或员工的基金，需要评估美国对外投资规则是否适用于其对中国科技企业的投资。

贸易商面临的是同样的问题，只是更为尖锐。他们的业务依赖于能否获得西方银行和保险公司的服务，而这又取决于他们的合规记录。一家接受了来源不明但利润丰厚的货物的贸易商，可能因此失去整个业务的融资。第H部分第IV章和第G部分第V章描述了自2022年以来新加坡较大的贸易商如何管理这一风险。

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对家族及其顾问的影响

在新加坡持有财富的家族应考虑地缘政治事件可能如何影响其架构。一个在美国和中国都有成员或资产的家族，可能面临法律冲突，从税务和申报到制裁和出口管制，不一而足。其治理文件应对某一成员、资产或投资受到限制的可能性作出安排。其顾问应了解哪些投资属于敏感行业，以及是否有成员因其地位或活动而可能被列入制裁名单。

分散化仍是应对地缘政治风险的经典答案。如今，它还包括司法管辖区、托管机构、货币和支付渠道的分散。新加坡可以是这一策略中的一个要素。一个只依赖新加坡的家族，不过是换了个地址，重复了它试图摆脱的集中。

机构与顾问核对清单

- 对照联合国、新加坡、美国、欧盟和英国的名单筛查客户、交易对手和船舶，并记录如何解决名单之间的冲突。
- 识别依赖美元或美国技术的业务，并评估次级制裁和出口管制对其的影响。
- 就电子产品、半导体、服务器和军民两用物品的贸易核实原产地、最终用途和最终用户，货物转运至第三国时尤须谨慎。
- 审查基金或家族办公室对中国公司的投资是否属于美国对外投资规则的范围，以及中国法律是否施加了与外国措施相冲突的义务。
- 审查客户和借款人在关税、供应链集中度和航运路线中断方面的风险敞口。
- 将地缘政治情景（包括对某一主要经济体的制裁和某条海上通道的关闭）纳入压力测试和业务连续性计划。
- 在客户情况使之成为审慎之举时，分散客户资产的托管机构、货币和支付渠道。

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- 记录在疑难案件中作出的决定，因为监管机构和代理行将根据有据可查的理由来评判机构。

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Author contact: Dr Alexander Ressos, TEP · contact@ressos.com

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