制裁与出口管制：联合国措施、俄罗斯与次级制裁

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

贸易枢纽的生命在于货物、船舶和支付的自由流动。制裁的存在，正是为了阻止其中的一部分。新加坡港口为每一个主要经济体处理货物，其银行和贸易商每天都与俄罗斯、中国、伊朗的邻国、海湾地区和西方的交易对手打交道。因此，对新加坡而言，制裁法不仅仅是一个合规课题。它决定了大国意见分歧时这座城市所处的立场。在作为独立国家的大部分历史中，新加坡对这一问题的回答只有一条规则：执行联合国安全理事会的制裁，不执行其他任何制裁。2022年2月俄罗斯入侵乌克兰，导致了四十多年来第一个重大例外。

本章考察一个位于东西方之间的枢纽所面临的制裁格局。本章首先介绍新加坡借以实施联合国制裁的法律机制，以及界定其界限的判例法。随后分析2022年针对俄罗斯采取的措施及其后续发展。第三节转向美国和欧洲的制裁制度。新加坡并不执行这些制度，但它们通过美元、代理行业务以及合同约束着新加坡的银行、贸易商和船东。本章接着探讨海事层面，从新加坡周边水域的船对船过驳，到运载受制裁石油的影子船队，最后讨论战略物资管制。

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

与日内瓦卷的比较贯穿本章始终。日内瓦卷关于制裁的一章，以瑞士联邦委员会2022年2月28日决定采纳欧盟对俄制裁开篇，并以路易十一的敕令作结：1462年，他以王室法令切断了日内瓦的集市。新加坡在同一天宣布了自己的措施，但它是单独行动的，运用的是自己的工具，范围也较窄。这一差异反映了对同一问题的两种回答。一个依赖于由他方决定的流动而生存的贸易地，必须选择在多大程度上与能够中断这些流动的大国保持一致。

要点

新加坡通过《2001年联合国法》、新加坡金融管理局针对金融机构的条例，以及由新加坡关税局执行的贸易管制，实施联合国安全理事会的制裁。作为一项政策，新加坡不执行其他国家采取的单边制裁。2022年2月28日和3月5日宣布的对俄措施是一个罕见的例外：这些措施禁止向俄罗斯出口军用物资以及某些电子、计算机和电信物项，并禁止金融机构与四家俄罗斯银行往来，以及为新的俄罗斯国家债务提供融资。美国、欧洲和英国的制裁通过美元、代理行、保险公司和合同交易对手间接影响新加坡，从而在这座城市具有商业上的约束力。新加坡周边水域的船对船过驳，以及运载俄罗斯和伊朗石油的影子船队的扩张，使海事风险成为一个核心合规课题。自2003年1月1日起生效的《战略物资（管制）法》对军用物资和军民两用物资的出口、转运、过境、中介以及无形转让实施管制。

Disclaimer

This article is provided for general information only. It is based on publicly available sources as at its date of publication. These sources have not been independently verified against licences, regulatory registers or the records of the entities concerned. It is not legal, tax, financial or investment advice. Nor is it a recommendation to invest in, transact with or use the services of any entity mentioned. Law and regulation change frequently, so the content may be incomplete or outdated. To the fullest extent permitted by law, Dr Alexander Ressos and the publisher of SingaporeIQ exclude all liability for loss or damage arising from the use of or reliance on this article. Readers should obtain advice on their specific circumstances before acting or refraining from action.

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.

Names and trademarks of the entities discussed belong to their owners and are used for identification only. Their mention implies no endorsement, affiliation or allegation of wrongdoing. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. Corrections and updates: contact@ressos.com.

© 2026 Dr Alexander Ressos. This article may be quoted with attribution to SingaporeIQ (SingaporeIQ.com). Reproduction in full and any commercial use require prior written consent. The Legal Terms at https://singaporeiq.com/legal-terms apply.

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

© 2026 Dr Alexander Ressos. General information only, not legal, tax or investment advice. No client relationship is created. All Singapore law advice is provided by a duly licensed and regulated firm of Singapore advocates and solicitors only on the basis of an express written letter of engagement. More information at SingaporeIQ.com and ressos.com.sg.