制裁与出口管制：联合国措施、俄罗斯与次级制裁：摘要

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新加坡通过《2001年联合国法》、新加坡金融管理局依据《2022年金融服务与市场法》制定的条例以及新加坡关税局执行的贸易管制，落实联合国安理会的制裁；其法院对这些措施的解释十分严谨，2011年的*The "Sahand"*案即为例证。新加坡长期奉行只执行联合国制裁的政策，而2022年2月和3月针对俄罗斯的措施，是1978年以来这一政策的首个重大例外。这些措施禁止出口军用物资以及某些电子、计算机和电信产品，并禁止金融机构与四家俄罗斯银行进行交易、为新的俄罗斯国家债务提供融资，或利用数字支付代币规避上述规则。新加坡并不执行美国、欧洲和英国的制裁，但这些制裁通过美元、代理行业务、保险、集团政策和合同条款触及新加坡的银行、贸易商和船东，第14114号行政命令项下的次级制裁以及对使用新加坡原产货物的网络所作的指定即为例证。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壮大，已使海事风险成为合规的核心议题和公共安全问题；新加坡通过港口国监督和私营部门的尽职调查加以应对。2003年的《战略物资（管制）法》设有全面管控条款和按货物价值计算的罚则，并于2026

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年12月推出新的管制令。该法完善了新加坡的制裁框架，使新加坡既能继续作为东西方之间的枢纽，又能向合作伙伴证明这一枢纽并非规避制裁的渠道。

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