新加坡的制裁取向

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新加坡的制裁政策與瑞士不同，橫跨兩個金融中心的合規計劃必須從第一天起便考慮這一點。正如第F部分第VII章所述，瑞士根據《禁運法》實施聯合國制裁，並自2022年起幾乎完全跟從歐洲聯盟的自主制裁，尤其是針對俄羅斯及白俄羅斯的制裁。新加坡基於國際法律義務實施聯合國制裁，除此之外一直避免實施自主制裁，唯一例外是2022年3月因俄羅斯入侵烏克蘭而採取的措施。新加坡並不直接採納美國、歐洲聯盟或英國的制裁。然而，由於其金融機構涉及美元業務，它們在實務上仍遵從美國的制度。結果形成三層架構：具約束力的聯合國措施、針對俄羅斯的措施，以及美國財政部海外資產控制辦公室（OFAC）帶來的商業現實。

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