2022年3月針對俄羅斯的措施

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2022年3月5日，新加坡宣布因應烏克蘭被入侵而對俄羅斯實施制裁，這是數十年來首次在沒有安全理事會授權的情況下採取行動。外交部解釋，偏離慣常做法的原因，是一個主權國家無故遭受入侵，而安全理事會又因俄羅斯行使否決權而陷於癱瘓。[1] 新加坡金融管理局（MAS）實施的金融措施，禁止金融機構與四家指名的俄羅斯銀行（VTB、VEB.RF、Promsvyazbank及Bank Rossiya）進行交易，亦禁止參與發行或買賣指定俄羅斯政府關聯實體的新證券，以及向這些實體提供融資。此外，措施亦禁止提供會便利俄羅斯政府或中央銀行集資的金融服務。

與本文最相關的是，措施明文禁止數碼支付代幣（DPT）交易。MAS指示金融機構，包括DPT服務提供者，不得便利涉及可用以規避其他措施的DPT交易。實際上，這意味着封鎖與指定銀行及實體有關的交易，並將與俄羅斯有關聯的DPT資金流視為較高風險。[2] DPT禁令在當時並不常見，顯示MAS從實施俄羅斯措施之初便已將加密資產視為規避制裁的渠道。出口管制方面，由新加坡關稅局根據《2002年戰略物資（管制）法》（Strategic Goods (Control) Act 2002）執行，限制軍用及軍民兩用物品以及若干電子產品。

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新加坡的措施比歐盟、英國或美國的制裁方案範圍更窄。新加坡沒有凍結寡頭的資產，沒有像歐盟在2022年10月那樣全面禁止向俄羅斯居民提供加密資產服務，亦沒有採納石油價格上限。居於新加坡而與指定實體無關的俄羅斯公民，可合法在新加坡持牌人處持有DPT帳戶，但須接受加強盡職審查。若瑞士條例中的加密資產服務禁令適用於同一人，該持牌人的瑞士聯屬公司便不能為其提供服務（參見第F部分第VII章）。這種不對稱是最清晰的例子之一，說明橫跨兩個金融中心的集團為何不能在沒有按司法管轄區區分的一層規則下，實行單一的客戶接納政策。

註釋

1. Ministry of Foreign Affairs, Singapore，2022年2月28日的聲明及2022年3月5日宣布對俄羅斯實施制裁及限制的新聞稿；MAS，2022年3月5日新聞稿，“MAS Imposes Financial Measures Against Russia”。 ↩
2. MAS，2022年3月5日新聞稿，以及隨附的MAS致金融機構有關俄羅斯金融措施的通告，包括禁止便利可規避有關措施的數碼支付代幣交易。 ↩

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