制裁與出口管制：聯合國措施、俄羅斯與次級制裁：摘要

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新加坡透過《2001年聯合國法》（United Nations Act 2001）、新加坡金融管理局（MAS）根據《2022年金融服務及市場法》（FSMA）訂立的規例，以及由新加坡關稅局執行的貿易管制，實施聯合國安全理事會的制裁；其法院亦對這些措施作出精確解釋，2011年的*The "Sahand"*案即為一例。新加坡長期奉行只執行聯合國制裁的政策，而2022年2月及3月針對俄羅斯的措施，是自1978年以來首個重大例外。這些措施禁止出口軍用物品及若干電子、電腦及電訊物品，並禁止金融機構與4家俄羅斯銀行交易、為俄羅斯新發行的國債提供融資，或利用數碼支付代幣規避上述規則。新加坡並不執行美國、歐洲及英國的制裁，但這些制裁透過美元、代理銀行業務、保險、集團政策及合約條款觸及其銀行、貿易商及船東；第14114號行政命令的次級制裁，以及對使用新加坡原產貨物的網絡所作的指定，均說明了這一點。新加坡周邊水域的船對船轉駁，以及運載俄羅斯及伊朗石油的影子船隊不斷擴大，令海事風險成為合規的核心課題，亦成為公共安全問題；新加坡透過港口國監督及私營機構的盡職審查加以應對。2002年的《戰略物資（管制）法》設有全面

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管制條款及按貨物價值計算的罰則，加上2026年12月的新管制令，完善了新加坡的制裁框架。這個框架讓新加坡得以繼續擔當東西方之間的樞紐，同時向夥伴證明這個樞紐並非規避制裁的渠道。

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