# シンガポールの制裁へのアプローチ

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

シンガポールの制裁政策はスイスのそれと異なっており、両ハブにまたがるコンプライアンス・プログラムは初日からその違いを考慮に入れなければなりません。第F部第VII章で説明するとおり、スイスは国際連合の制裁を禁輸法（Embargo Act）に基づいて実施しており、2022年以降は欧州連合の独自制裁、とりわけロシアとベラルーシに対する制裁にほぼ完全に足並みを揃えています。シンガポールは国際連合の制裁を国際法上の義務として実施していますが、それ以外の独自制裁は控えてきました。唯一の例外は、ロシアのウクライナ侵攻を受けて2022年3月に講じた措置です。シンガポールは、米国、欧州連合または英国の制裁をそのまま採用することはありません。それでも、シンガポールの金融機関は米ドルへのエクスポージャーがあるため、実務上は米国の制度を遵守しています。その結果、拘束力のある国連の措置、ロシアに対する措置、そしてOFACという商業上の現実からなる三層構造が生まれています。

© 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.

## 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 Law and regulation change frequently, so the content may be incomplete or outdated.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.

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