Sanctions and Export Controls: UN Measures, Russia and Secondary Sanctions: summary

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Singapore gives effect to the sanctions of the United Nations Security Council through the United Nations Act 2001, regulations of the Monetary Authority under the Financial Services and Markets Act 2022 and trade controls administered by Singapore Customs, and its courts have construed these measures precisely, as *The "Sahand"* showed in 2011. Its long-standing policy of enforcing only United Nations sanctions saw its first major exception since 1978 in the measures against Russia of February and March 2022, which ban exports of military goods and certain electronic, computer and telecommunications items and bar financial institutions from dealing with four Russian banks, financing new Russian state debt or using digital payment tokens to circumvent these rules. American, European and British sanctions, which Singapore does not enforce, reach its banks, traders and shipowners through the dollar, correspondent banking, insurance, group policies and contract clauses, as the secondary sanctions of Executive Order 14114 and the designations of networks using Singapore-origin goods illustrate. Ship-to-ship transfers in the waters around Singapore and the growth of shadow fleets carrying

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Russian and Iranian oil have turned maritime risk into a core compliance subject and a question of public safety, which Singapore addresses through port state control and the diligence of its private sector. The Strategic Goods (Control) Act 2002, with its catch-all clause, value-based penalties and new control order of December 2026, completes a sanctions framework that allows Singapore to remain a hub between East and West while proving to its partners that the hub is not a channel of evasion.

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