# United Nations sanctions in Singapore law

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## The United Nations Act 2001

Singapore follows the dualist tradition of the common law. A treaty binds the state internationally, but it creates rights and obligations within Singapore only when Parliament or a delegated legislator has enacted it. Article 25 of the United Nations Charter obliges member states to carry out the decisions of the Security Council, while Article 41 allows the Council to decide on measures short of armed force, such as the interruption of economic relations. The domestic vehicle for these decisions is the United Nations Act 2001, an Act to enable Singapore to fulfil its obligations respecting Article 41 of the Charter.

The Act is short. Its central provision, section 2(1), empowers the Minister to make the regulations that appear necessary or expedient to give effect to a decision of the Security Council under Article 41. The regulations may provide for the apprehension, trial and punishment of offenders and may confer police powers on investigators. Section 2(2) and (3) exclude financial institutions and variable capital companies from regulations under the Act, because the Monetary Authority of Singapore makes separate rules for them. Regulations must be presented to

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Parliament as soon as possible after their publication in the *Gazette*.[1] Offences under the regulations carry substantial penalties. An individual faces a fine of up to S$500,000, imprisonment of up to ten years or both, while other offenders face fines of up to S$1 million.[2]

The design is typical of Singapore's legislative technique. Parliament enacts a framework and leaves the detail to the executive, which can then follow the Security Council's frequent amendments without a new statute each time. The regulations under the Act follow a common pattern. Each one names the Security Council resolutions to which it gives effect, defines the designated persons by reference to the lists kept by the relevant sanctions committee and prohibits dealings with them. Regimes exist for, among others, the Democratic People's Republic of Korea, Iran, the Democratic Republic of the Congo, South Sudan and Yemen, together with regulations on terrorism that implement Resolutions 1267, 1373 and their successors.[3]

## Financial institutions: the regime of the Monetary Authority

Banks, insurers, capital markets intermediaries and payment service providers are subject to a parallel regime administered by the Monetary Authority of Singapore. Since 2023 it has given effect to the targeted financial sanctions of the Security Council through regulations made under section 192 of the Financial Services and Markets Act 2022, read with sections 15(1)(b) and 219(d). A separate set of regulations under section 83(1)(b) of the Variable Capital Companies Act 2018 covers the variable capital companies examined in Chapter E.IV. The current regulations, dated 28 April 2023, cover the Democratic Republic of the Congo, Iran, the Democratic People's Republic of Korea, Libya, Somalia, South Sudan, Sudan and Yemen. They apply to all financial institutions in Singapore.[4]

The regulations impose two core duties. A financial institution must freeze the funds, financial assets and economic resources of designated persons and must not make funds or services available to them. Designations against terrorist financing rest on a separate statute, the Terrorism (Suppression of Financing) Act 2002. The

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Monetary Authority expects all natural and legal persons in Singapore, including those outside the regulated sector, to screen their clients against the United Nations lists before doing business with them.[5] The obligation to report suspicions, discussed in Chapter H.III, completes the picture. A bank that freezes a designated person's account will usually also file a suspicious transaction report.

The Iran regime shows how the system follows the Security Council. After the nuclear agreement of 2015 and its endorsement in Resolution 2231, the Monetary Authority cancelled a notice that had barred Iran-related transactions and revised its Iran regulations in January 2016.[6] When the Security Council's Iran sanctions were reinstated under the snapback mechanism of that resolution on 27 September 2025, Singapore re-applied all provisions in the form in which they had applied before 2015.[7]

## Customs, trade measures and North Korea

The trade side of United Nations sanctions belongs to Singapore Customs. It prohibits the import, inward transhipment and transit of specified goods from North Korea and Iran and controls the export, outward transhipment and transit of specified goods to both countries and to other states under Security Council measures.[8] For a port in which most cargo is transhipped, the inclusion of transhipment and transit is essential. Goods that never enter the Singapore market still pass through its terminals, where the Security Council expects the transit state to stop them.

North Korea tested the system most severely. Resolution 2375, adopted unanimously on 11 September 2017, capped deliveries of refined petroleum to the country at 500,000 barrels for the last quarter of 2017 and two million barrels a year from 2018, limited crude oil to the level of the previous twelve months and banned purchases of North Korean textiles.[9] Resolution 2397 of 22 December 2017 reduced the refined petroleum cap to 500,000 barrels a year, required North Korean workers abroad to be sent home within 24 months and allowed member states to seize and impound vessels in their territorial waters that illicitly supplied petroleum to the country.[10]

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Singapore responded by suspending its trade with North Korea from November 2017 and revoking the work permits of North Korean nationals in 2018, in line with Resolution 2397. The suspension was a significant step, since Singapore had been North Korea's eighth-largest trading partner as recently as 2016. Prosecutions followed. A Singapore firm was fined in 2016 in connection with the shipment of disassembled radar systems, missile components and fighter aircraft parts from Cuba to North Korea. In 2022 another Singapore company was charged with exporting beverages to the country.[11]

## The courts and the limits of UN sanctions

The decision of the High Court in *The "Sahand"* in 2011 defines the reach of United Nations sanctions in Singapore law. Crédit Agricole Corporate and Investment Bank had arrested three vessels owned by German subsidiaries of the Islamic Republic of Iran Shipping Lines, claiming an accelerated debt of more than US$180 million under financing arrangements governed by English law. The parties had not raised the sanctions. Quentin Loh J raised them of his own motion, because he was concerned that vessels held in Singapore waters might fall under the asset freeze of the Security Council. He treated the resolutions as part of Singapore law only insofar as they had been enacted in domestic legislation, since Singapore is a dualist jurisdiction. Resolution 1929 (2010) had designated three entities of the shipping group without designating the group itself. Nothing showed that the German owners were owned or controlled by those entities or acted for them. The freeze therefore did not apply, which allowed the release of the vessels.[12]

The judgment has three lessons for practice. First, the question whether a transaction is prohibited in Singapore is a question of the domestic regulations, read according to their terms. Second, sanctions are construed as targeted measures, which leave lawful trade with the same country untouched. Third, the admiralty jurisdiction of the Singapore courts continues to operate when one party is connected with a sanctioned state, which matters for a port in which ship arrests are a routine means of securing maritime claims. The judgment thus confirms a theme of Chapter F.I: the Singapore courts apply sanctions as law, with the precision that law requires.

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# Notes

1. United Nations Act 2001 (2020 Rev Ed), s. 2(1)–(3), (5)–(7), as summarised in Legal Wires, "United Nations Act 2001" (accessed November 2026): regulations "necessary or expedient" to give effect to Article 41 measures; exclusion of financial institutions regulated under the Financial Services and Markets Act 2022 and of variable capital companies; presentation to Parliament "as soon as possible after publication in the Gazette". ↩

2. Legal Wires, "United Nations Act 2001" (accessed November 2026), summarising s. 5: for individuals a fine not exceeding $500,000 or imprisonment not exceeding 10 years or both, in other cases a fine not exceeding $1 million; the Act was amended by Acts 9 of 2003, 4 of 2014, 16 of 2016, 44 of 2018 and 18 of 2022, and the revised edition took effect on 31 December 2021. ↩

3. Regulations under the United Nations Act listed on Singapore Statutes Online, among them the United Nations (Sanctions — Democratic People's Republic of Korea) Regulations 2010, the Democratic Republic of the Congo regulations (Resolutions 1596 (2005), 1807 (2008), 2293 (2016) and 2582 (2021)) and the anti-terrorism regulations (Resolutions 1267, 1373, 1988, 1989 and 2253). ↩

4. Monetary Authority of Singapore, "Regulations for Targeted Financial Sanctions", mas.gov.sg (accessed November 2026): Financial Services and Markets Regulations dated 28 April 2023 and VCC Regulations dated 14 January 2020 for the eight country regimes; they "apply respectively to all financial institutions and variable capital companies in Singapore"; Monetary Authority of Singapore, "Regulations for Targeted Financial Sanctions", mas.gov.sg (accessed November 2026): MAS "gives effect to targeted financial sanctions under the United Nations Security Council Resolutions" through Financial Services and Markets Regulations made under "section 192, read with sections 15(1)(b) and 219(d), of the Financial Services and Markets Act 2022" and through the Variable Capital Companies (Sanctions and Freezing of

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Assets of Persons) Regulations 2020 under "section 83(1)(b) of the Variable Capital Companies Act 2018". ↩

5. Monetary Authority of Singapore, "Lists of Designated Individuals and Entities", mas.gov.sg (accessed November 2026): the lists cover persons designated under regulations made under the Financial Services and Markets Act 2022, the United Nations Act 2001 and other Acts; "all natural and legal persons in Singapore should screen their clients against the United Nations lists"; counter-terrorism designations under the Terrorism (Suppression of Financing) Act 2002. ↩
6. *Lloyd's List*, "Singapore regulator cancels notice barring Iran transactions", 29 January 2016: MAS cancelled a notice barring Iran transactions and "will also revise MAS Iran Regulations in accordance with UN resolutions". ↩
7. Monetary Authority of Singapore, "Lists of Designated Individuals and Entities", mas.gov.sg (accessed November 2026): the UNSC "has reinstated the relevant UNSC Resolutions and Iran sanctions list" on 27 September 2025; "All provisions have been re-applied in the same manner as they applied" before 2015. ↩
8. Singapore Customs, "United Nations Security Council Sanctions", customs.gov.sg (accessed November 2026): imports, inward transhipment and transit of specific goods from the DPRK and Iran are prohibited, exports, outward transhipment and transit of specific goods to them are prohibited or restricted, and specific goods are controlled for "certain countries designated under United Nations Security Council (UNSC) sanctions". ↩
9. Wikipedia, "United Nations Security Council Resolution 2375" (accessed November 2026): adopted 11 September 2017 by 15 votes; refined petroleum limited to 500,000 barrels from 1 October to 31 December 2017 and two million barrels a year from 1 January 2018; crude oil limited to the amount supplied in the preceding twelve months; full ban on purchasing North Korean textiles. ↩
10. Wikipedia, "United Nations Security Council Resolution 2397" (accessed November 2026): adopted unanimously on 22 December 2017; refined

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petroleum capped at 500,000 barrels per twelve months from 1 January 2018; repatriation of North Korean workers within 24 months; member states may "seize, inspect, freeze and impound any vessel in their territorial waters" that illicitly supplies petroleum. ↩

11. Wikipedia, "North Korea–Singapore relations" (accessed November 2026): Singapore "has officially suspended trade ties with North Korea under UN sanctions from November 2017" and in 2018 revoked all work permits of North Koreans "in line with the enhanced sanctions in the UNSC Resolution 2397 (2017)", citing *The Straits Times*, 28 March 2018; Singapore was North Korea's tenth-largest trading partner in 2010 and its eighth-largest in 2016; the Singaporean firm Chinpo Shipping fined "$125,700 in violation of United Nations-led sanctions" in 2016 in connection with the shipment of disassembled radar systems, missiles and MiG fighter components from Cuba to North Korea; a Singaporean company charged in 2022 for exporting beverages to North Korea. ↩

12. *The "Sahand" and other applications* [2011] SGHC 27 (Quentin Loh J, 31 January 2011), as summarised in Legal 500 (Mondaq), "Asia Update – April 2011": three IRISL-subsidiary vessels arrested for an accelerated debt of over US$180 million under English law financing arrangements; the Iran resolutions are not intended to affect "legal economic activities"; Legal Wires, "The 'Sahand' and other applications [2011] SGHC 27": plaintiff Crédit Agricole Corporate and Investment Bank, loan documentation governed by English law; S. Zhixiang, "Interpreting and Applying the UNSC sanctions on Iran in the Admiralty Context: The Sahand [2011] SGHC 27", *EJIL: Talk!*: the judge raised the issue of his own motion, Singapore as "a dualist jurisdiction", IRISL not designated, only Irano Hind Shipping Company, IRISL Benelux NV and South Shipping Line Iran listed in Annex III of Resolution 1929 (2010), no evidence that the German owners were owned or controlled by them, vessels released. ↩

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