L'approche singapourienne des sanctions

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La politique de sanctions de Singapour diffère de celle de la Suisse d'une manière dont un programme de conformité sur deux places doit tenir compte dès le premier jour. Comme l'explique la partie F, chapitre VII, la Suisse met en œuvre les sanctions des Nations unies en vertu de la loi sur les embargos (LEmb) et s'est alignée depuis 2022 de façon presque complète sur les sanctions autonomes de l'Union européenne, surtout contre la Russie et le Bélarus. Singapour met en œuvre les sanctions des Nations unies au titre de ses obligations de droit international et s'est pour le reste abstenue de sanctions autonomes, à une exception près, décidée en mars 2022 en réaction à l'invasion de l'Ukraine par la Russie. Singapour ne reprend pas en tant que telles les sanctions des États-Unis, de l'Union européenne ou du Royaume-Uni. Ses établissements financiers se conforment néanmoins en pratique au régime américain en raison de leur exposition au dollar. Il en résulte une structure à trois niveaux : les mesures contraignantes de l'ONU, les mesures visant la Russie et la réalité commerciale de l'OFAC.

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