

Sanctions against African states

*Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland), Solicitor (Hong Kong),
Solicitor (England & Wales)*

The sanctions regimes, whose operation Part H has described, concern several African states. The Geneva practitioner must be familiar with them. The State Secretariat for Economic Affairs maintains twenty-eight sanctions ordinances. Among them are measures against the Democratic Republic of the Congo, adopted on 22 June 2005; against Sudan, adopted on 25 May 2005 on the basis of Security Council resolutions and supplemented, on 9 October 2023, by the adoption of the European Union measures taken after the outbreak of the conflict; against Guinea, adopted on 16 December 2009; against Libya, adopted on 30 March 2011; against Guinea-Bissau, adopted on 1 June 2012; against Burundi, adopted on 4 December 2015; and against the Central African Republic.¹ These regimes combine arms embargoes, asset freezes and entry bans aimed at designated persons and entities, whose lists are amended several times a year, as the Sudan list was in April, June and August 2026.²

These sanctions have concrete effects for the financial centre. A Geneva bank executing a humanitarian payment to Sudan, a trader buying gold whose origin might be Sudanese, a manager whose client is linked to a designated person in the Democratic Republic of the Congo or in Libya must screen their transactions against Swiss, United Nations, European and American lists that do not always coincide, as Part H has shown. The case of Sudanese gold, the trade in which finances the belligerents and part of which passes through the United Arab Emirates before reaching the refineries, is the one in which sanctions risk and reputational risk converge. On 10 September 2026 Switzerland prohibited the purchase and import of Sudanese gold, including through third countries, aligning itself with the European Union sanctions in force since 15 July 2026, at a time when its gold imports from the Emirates had reached 420 tonnes in 2025, nearly three times the previous year's figure. Without transparency as to the real origin of the metal passing through Dubai, the measure will remain difficult to apply.³⁴ The African sanctions are less extensive than those

aimed at Russia or Iran, but they affect countries with which Geneva maintains real flows. They change with the rhythm of the conflicts. Monitoring them forms part of the country analysis grid described above.

1 Notes

1. State Secretariat for Economic Affairs, “Ordonnances de sanctions” (Sanctions ordinances) and “Mesures à l’encontre du Soudan” (Measures against Sudan), seco.admin.ch (accessed September 2026). ↩
2. State Secretariat for Economic Affairs, “Mesures à l’encontre du Soudan”, cited above. ↩
3. Afrimag, September 2026, cited above, quoting the State Secretariat for Economic Affairs. ↩
4. “Guerre au Soudan : la Suisse se rallie aux sanctions sur l’or, Dubaï reste le maillon faible” (War in Sudan: Switzerland joins the gold sanctions, Dubai remains the weak link), Afrimag, September 2026: Sudanese production of 80 to 90 tonnes a year, only 14.7 tonnes declared for export in 2025, smuggling by the Rapid Support Forces through Chad, Libya, the Central African Republic, South Sudan and Uganda; Swiss gold imports from the United Arab Emirates of 420 tonnes in 2025, worth CHF 38.9 billion. ↩

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