

Enforcement: SECO and the Office of the Attorney General

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The enforcement of the sanctions lies with SECO, which conducts administrative proceedings for minor violations, and with the Office of the Attorney General, which prosecutes particularly serious cases. The Embargo Act punishes intentional violations with a custodial sentence of up to one year or a monetary penalty and serious cases with a custodial sentence of up to five years. Negligent violations are punishable by fines of up to 100,000 francs.¹

In February 2024, SECO transferred to the Office of the Attorney General, for the first time since the Russian sanctions took effect, the findings of its investigation against two commodity trading companies, which were suspected of having circumvented the sanctions through subsidiaries in the United Arab Emirates and other Gulf states. According to SECO, a violation occurs where funds flow between the parent company in Switzerland and the subsidiary abroad, or where business instructions are given from Switzerland to the subsidiary. The maximum penalty for the companies was reported as one million francs each.²

In September 2025, SECO searched the premises of a commodity trader in Zug, Open Mineral, in connection with an investigation into possible violations of the sanctions through the trade in Russian gold in 2022. The investigation was directed against two persons and against unknown persons. The company stated that it was cooperating with the authorities.³ As the proceedings were pending at the time of writing, the presumption of innocence applies to the persons and companies concerned.

The enforcement of the sanctions in the commodity trade has been criticised as weak. According to a report of 2023, SECO did not actively monitor compliance with the oil sanctions, did not conduct audits and did not impose reporting or documentation requirements for such transactions, relying instead on the self-regulation of the industry. The

same report noted that the Swiss Embargo Act, unlike the corresponding European and American rules, does not apply to Swiss citizens residing abroad.⁴ A report of the Control Committee of the Council of States of November 2023 examined the participation of the Confederation in economic sanctions.⁵

1 Notes

1. Source as cited in the printed edition. ↩
2. SRF, "Russland-Sanktionen umgangen? Verdacht gegen zwei Rohstofffirmen erhärtet", 12 February 2024, [srf.ch](https://www.srf.ch): two commodity trading companies suspected of evading Swiss Russia sanctions through subsidiaries in the UAE and other Gulf states; violations occur "if funds flow between the parent company in Switzerland and the subsidiary abroad" or "if business instructions go from Switzerland to the subsidiary"; SECO classified the suspected violations as particularly serious and transferred its findings to the Office of the Attorney General, a first since the Russia sanctions took effect; maximum penalty of CHF 1 million per firm; the Embargo Act permits federal prosecution only in particularly serious cases. ↩
3. [watson.ch](https://www.watson.ch), "Seco ermittelt gegen Zuger Rohstofffirma wegen Russland-Sanktionen", 19 September 2025: search on 11 September 2025 at the premises of Open Mineral, a Zug-based raw materials trader, in connection with possible violations of the Russia sanctions through gold trading in 2022; investigation directed against two persons and unknown parties; the company confirmed its cooperation; Swiss office opened in 2016. ↩
4. Infosperber, "Die Schweiz überwacht Öl-Sanktionen zu Russland kaum": SECO neither conducts audits nor imposes reporting or documentation requirements for such transactions, relying on industry self-regulation; the Swiss embargo law does not apply to Swiss citizens residing abroad. ↩

5. Control Committee of the Council of States (GPK-S), report "Nachkontrolle: Beteiligung des Bundes an Wirtschaftssanktionen", 14 November 2023, parlament.ch (PDF): follow-up review of the implementation of five earlier recommendations and of the measures taken after the Russian invasion of Ukraine; improved data on the movement of goods; interpretation difficulties arising from differences between Swiss and EU law; initial uncertainty about the role of the cantons; additional resources for SECO. ↩

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