

Information regarding to russian origin metal import regulations

With this letter, we confirm that we are aware of and are taking appropriate measures to respond to the ongoing and recently issued new restrictions on the import and use of articles and materials of Russian origin, in particular metal articles and materials to comply with these including, but not limited to:

- (i) the European Union ("EU") and United Kingdom's ban on the import of iron and steel products, effective on 30 September 2023, introduced by the EU Council Regulation (EU) 2023/1214 of 23 June 2023 (as it amends Council Regulation No 833/2014)) and by the United Kingdom (UK) in Schedule 3B in The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023 (amending The Russia (Sanctions) (EU Exit) Regulations 2019);
- (ii) the additional import restrictions introduced by the EU on 18 December 2023 by Council Regulation (EU) 2023/2878 of 18 December 2023 (as it amends Council Regulation No 833/2014) (including the addition of restrictions on the imports of certain aluminum items);
- (iii) the additional metal import restrictions introduced by the UK on 14 December 2023 in Schedule 3BA of The Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2023 (amending The Russia (Sanctions) (EU Exit) Regulations 2019); and
- (iv) the restrictions on the importation and trading of Aluminum, Copper and Nickel of Russian origin announced by the United States and UK on 12 April 2024 with effect from 13 April 2024;

as may be amended and extended from time to time by the issuing governments.

Together (i) to (iv) are referred to as the "Russian Origin Metal Import Regulations".

The overall effect of these Russian Origin Metal Import Regulations is as follows:

- (a) a ban on import or purchase of iron and steel products and materials manufactured in or consigned from Russia or processed in a third country but containing iron or steel from Russia (with effect from 30 September 2023) into the EU, UK and other countries that have implemented equivalent measures;
- (b) a ban on imports into the UK of specific additional metals as listed in Schedule 3BA of the UK's Regulations as specified in (iii) above (*1); and
- (c) a ban on imports of Aluminium, Cooper or Nickle of Russian origin into the United States and UK with effect from 13 April 2024.
- (d) requirements for importers to provide evidence of the country of origin of metal inputs and certification statements confirming metal inputs are not of Russian origin when importing metals and processed items and products into the EU, UK, US and other countries with equivalent bans;

(*1) The Russia (Sanctions) (EU Exit) Regulations 2019 (legislation.gov.uk)

Uebigau, d. 15.01.2025

signed by Th. Münch
Managing Director

signed by E. Kohl
Managing Director