

Information regarding EU sanctions against Russia

Regulation (EU) No. 833/2014 Article 12g

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General information

On 18th December 2023, EU Member States agreed on a 12th package of sanctions against Russia. Once again, particular attention is paid to preventing the circumvention of sanctions. For instance, exporters will be required to include reexport clauses in supply contracts. The 12th sanctions package is implemented by Regulation (EU) No. 2023/2878, amending Regulations (EU) No. 833/2014 which set out sanctions on Russia for goods. The amendment to this Regulation came into force on 19th December 2023.

Necessary actions pursuant to Regulation (EU) No. 833/2014 Article 12g

The EU's focus remains on preventing the circumvention of its sanctions against Russia. The most far-reaching impact for exporters will be the new obligation to include a clause prohibiting buyers from reexporting certain goods to Russia. Following on from the obligation to provide evidence for iron and steel imports introduced in the 11th sanctions package, the EU is once again obligating companies to take extensive action in this area. The new Article 12g (1) of Regulation (EU) No. 833/2014 stipulates that exporters must contractually prohibit reexport to Russia or reexport for use in Russia when selling, supplying, transferring or exporting certain goods and technologies to third countries from 20th March 2024. The goods and technologies concerned are those listed in Annexes XI (aerospace industry), XX (jet fuels) and XXXV (firearms) of the Regulation; firearms and ammunition as listed in Annex I of Regulation (EU) No. 258/2012; and common high priority goods as listed in Annex XL of the Regulation. The partner countries listed in Annex VIII of the Regulation - currently USA, Japan, UK, South Korea, Australia, Canada, New Zealand, Norway, and Switzerland - are excluded from the scope of application. According to Article 12g (2) of Regulation (EU) No. 833/2014, the obligation does not apply to contracts concluded before 19th December 2023 that are fulfilled by 20th December 2024 at the latest or expire before then.

For the company Rickmeier GmbH the following products are affected according to Annex XL:


- **HS-Code 8482.10, 8482.20, 8482.30 and 8482.50** various types of ball bearing
- **HS-Code 8536.90** plug

In these cases, you will find the following additional text on our order acceptances:

The company Rickmeier GmbH prohibits the re-export of ball bearing and plug to Russia or for use in Russia. We would like to point out that in the event of a violation against the prohibition (a) we are legally obliged in reporting the violation to our authorities immediately, and (b) we are obliged in reviewing the business relationship with the buyer (including the option of immediate termination of the business relationship). For the sake of good order, we would like to point out that the EU is authorized to exclude companies worldwide from participating in business transactions with the EU by including them in the blacklist in accordance with Annex I of Regulation (EU) No. 269/2014.

Company Name: **RICKMEIER GmbH**

Place and Date: Balve (Germany), 18th April 2024

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