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EU Sanctions against Russia - Iron and steel products

Subject: Purchase and import ban of goods listed in Annex XVII to Council Regulations (EU)833/2014, 2023/1214 _ Art. 3g (1) (d) - iron and steel products related to Russian primary materials.

The new regulation details are specified as follows:

- *COUNCIL REGULATION (EU) 833/2014, 2022/428
- 1. It shall be prohibited:
- (a) to import, directly or indirectly, iron and steel products as listed in Annex XVII into the Union if they:
- (i) originate in Russia; or
- (ii) have been exported from Russia;
- (b) to purchase, directly or indirectly, iron and steel products as listed in Annex XVII which are located or which originated in Russia;
- (c) to transport iron and steel products as listed in Annex XVII if they originated in Russia or are being exported from Russia to any other country;
- (d) to import or purchase, as from 30 September 2023, directly or indirectly, iron and steel products as listed in Annex XVII when processed in a third country incorporating iron and steel products originating in Russia as listed in Annex XVII; with regard to products listed in Annex XVII processed in a third country incorporating steel products originating in Russia of CN code 7207 11 or 7207 12 10 or 7224 90, this prohibition shall apply as of 1 April 2024 for CN code 7207 11 and as of 1 October 2024 for CN codes 7207 12 10 and 7224 90;
- (e) to provide, directly or indirectly, technical assistance, brokering services, financing, or financial assistance, including financial derivatives, as well as insurance and re-insurance, related to the prohibitions in points (a), (b), (c) and (d).

Greenway is committed to ensuring that all its business activities are conducted in compliance with the applicable export and import control laws and sanctions in the countries within which it operates and to adhere to best practice standards of trade compliance and we are fully aware of the above Regulation.

Based on the information available to us from our raw materials & products suppliers and to the best of our knowledge, we can confirm that none of the products we supply originate from Russia.

Any additional compliance requests including but not limited to written agreements, mill certificates or manufacturer traceability must be made prior to order acceptance and may be subject to additional charges. Requests received after this point will be rejected.

Robin Lipington

Director