

Confirmation of compliance

Obligation to provide evidence and rules of origin for iron, steel, and industrial products in accordance with EU sanctions law (Regulation (EU) 833/2014 and subsequent amendments)

As part of its sanctions package against Russia, the EU has introduced extensive restrictions on the import, purchase, and processing of certain goods. These regulations apply in particular to iron and steel products, as well as other industrial products that are manufactured wholly or partly from materials of Russian origin.

1. Iron and steel products as defined in Annex XVII to Regulation (EU) No. 833/2014

Since October 1, 2023, it has been prohibited to directly or indirectly import or purchase iron and steel products listed in Annex XVII into the EU if they have been processed in a third country using iron and steel products originating in Russia. The required proofs of origin must be presented by the respective importer upon import.

2. Other metals and semi-finished products in accordance with Annex XXIII of Regulation (EU) 833/2014

In addition, there are import bans on a number of other metal products and semi-finished products, including:

- Aluminum
- Copper
- Nickel
- Zinc
- Lead
- Certain alloys and semi-finished products

Here too, goods must not originate from Russia and must not have been manufactured using Russian raw materials.

3. Role of the Möller company

Möller is not a direct importer of iron, steel, or other metal products from third countries outside the EU. However, we are aware of the applicable legal requirements and require our suppliers to comply with all relevant EU sanctions regulations, in particular:

- Regulation (EU) 833/2014, as amended
- all associated annexes (including XVII and XXIII)
- relevant subsequent amendments to the EU sanctions packages

Our suppliers are obliged to provide the necessary evidence of the origin of the materials used and to ensure that no prohibited raw materials of Russian origin are used.

4. Confirmation from the Möller company

Based on the information available to us from our supply chain, Möller confirms that:

- none of the iron or steel products we use originate in Russia or have been processed in third countries using iron or steel products of Russian origin,
- none of the metallic raw materials or semi-finished products we use that fall under Annex XXIII of Regulation
- our suppliers are obliged to ensure compliance with EU sanctions regulations and to keep relevant evidence available.

approved by	Möller-Industrietechnik GmbH / Möller-Metalldichtungen GmbH Brunnenweg 10, 39444 Hecklingen
revision	01
date	09.02.2025
signature	This letter has been generated automatically and is valid even without a signature.
validity	This confirmation is valid until revoked. It will be reviewed regularly and updated immediately as soon as new findings from our supply chain or changes to the relevant regulations make this necessary.

This confirmation of compliance applies to Möller Industrietechnik GmbH and Möller-Metalldichtungen GmbH. Both companies use a common material compliance structure, identical supply chain assessment processes, and centralized supplier communication. The contents of this confirmation of compliance have been independently verified for both legal entities and apply equally to both.