

## Iron and Steel Resource Statement

The UK government has imposed a range of sanction measures, including trade, financial, transport and other sanctions, under The Russia (Sanctions) (EU Exit) Regulations 2019 (“the Russia Regulations”). The sanctions are aimed at encouraging Russia to cease actions which destabilise Ukraine, or undermine or threaten the territorial integrity, sovereignty, or independence of Ukraine.

The Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023 (“the 2023 Regulations”) amended the Russia Regulations and along with several other measures, introduced a prohibition on the import of certain Russian iron and steel products processed in a third country or multiple third countries. This built on measures banning the import of Russian origin iron and steel introduced in 2022. The ban on third country processed iron and steel is set out in Regulation 46IA and 46IB, which can be found in Chapter 4CA of Part 5 of the 2023 Regulations. Third country processing can be a means of concealing the Russian origin of iron and steel products, and this measure is targeted at reducing circumvention of sanctions on Russian iron and steel.

The prohibition on the import of Russian iron and steel products processed in a third country will come into effect from 30 September 2023.

### **Our Policy**

Gulmay Ltd. is committed to sourcing products from companies that share our values to complying to legislations. This includes the sourcing of certain Russian iron and steel products processed in a third country or multiple third countries. While we do not source these metals directly, they may exist in the materials and components we source. We are therefore committed to working with our customers and suppliers to responsibly source the materials and components we use in manufacturing our customers’ products which may contain them.

Gulmay Ltd. requires suppliers where possible to provide written confirmation of their due diligence with regard to sourcing iron and steel products, confirming that parts supplied are not products processed in a third country or multiple third countries to the best of their knowledge.

Gulmay Ltd. is not a manufacturer of iron and steel parts, and therefore is not in a position to provide accurate information relating to the use of them in the products it distributes. The manufacturers of the metalworks and products are the only source of accurate information regarding any iron and steel that may have been used in the manufacture of their products.

### **Communicating with Suppliers**

All suppliers (with related parts) are encouraged to provide accurate and transparent information about the origin of all products supplied to our company. In addition, we require the following from our suppliers:

- To source materials from socially responsible sub-tier suppliers and manufacturers
- To assist in complying with legislation related to sourcing iron and steel
- To pass these requirements along to their sub-tier suppliers

### **Our Commitment to Customers**

We firmly believe that our customers should be fully informed about the products they purchase. While we may not be able to certify as to the country of origin of iron and steel contained in the products manufactured by our suppliers, we are committed to working with our customers to supply products that meet our customer’s specifications.

We request the following from our customers:

- To design in components that can be sourced from socially responsible suppliers
- To assist in complying with legislation related to sourcing iron and steel
- Support supply chain changes required to eliminate sourcing iron and steel processed in a third country or multiple third countries from products

Gulmay Ltd. (as a purchaser) is many steps removed from the sourcing of iron and steel products. We do not knowingly procure any parts of certain Russian iron and steel products processed in a third country or multiple third countries. We rely on the manufacturers of the metalworks and products to provide accurate information regarding any iron and steel that may have been used in the manufacture of their products.

Gulmay Ltd. is committed to working with our customers and our suppliers to ensure effective implementation of this legislation.



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Andrew Platten  
Operations Director  
6<sup>th</sup> December 2023