

Declaration of Compliance with Regulation EU 833/2014 and The Russia (Sanctions) (EU Exit) Regulations 2019 – No Russian iron or steel

In response to recent announcements by the UK's Department for Business and Trade and the Department of International Trade, as well as corresponding EU authorities, stringent measures will take effect from 30 September 2023.

These measures pertain to the prohibition on the import of iron and steel products originating in Russia and/or processed in third-party countries. The aim is to curtail the circumvention of sanctions on the import of Russian iron and steel. There are no exceptions, and no transitional period is provided for any goods covered by these measures.

UK Regulations:

- The Russia (Sanctions) (EU Exit) Regulations 2019 as amended by the Russia (Sanctions) (EU Exit) (Amendment) Regulations 2023
 - Regulation 46IA and 46IB
 - For the purpose of this sanction, a relevant 'iron and steel product' is defined as anything specified in Schedule 3b of the Russia Sanctions Regulations
 - Commodity Codes: Chapters 72 and 73 of the UK Tariff

EU Regulations:

- EU: Regulation (EU) 833/2014 as amended by Council regulation (EU) 2023/1214
 - Annex XVII of (EU) 833/2014 as amended by Annex V of Regulation 2023/12
 - Commodity Codes: EU TARIC chapters 72 and 73
- EU Council Decision: CFSP 2023/1217

Declaration:

ASI Automatikk AS hereby confirms that all its product suppliers and partners are in either UK, EU or US and are therefore obligated to follow these regulations.

ASI Automatikk AS, including its subsidiaries, confirms that none of the products supplied to its customers contain iron or steel originating in Russia.

Since 20 March 2024, all our contracts for the supply of products contain a prohibition for re-export to Russia. From 19 January 2026, these contractual restrictions have also covered the supply of products from, and their re-export to, Belarus. This is following article 12g of EU Council Regulation 833/2014 'No Russia' Clause. We will immediately advise if this statement is no longer valid for any products supplied.

From 19 January 2026, ASI Automatikk will seek legal action for any breach of the above requirements and will pursue appropriate remedies in accordance with applicable Norwegian law.

Lier, 26 January 2026

Geir Berven, MD
ASI Automatikk AS

