



# **EU and UK Sanctions**

## **Supplier Expectations**

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# Background

- As part of sanctions against Russia, the European Union (EU) and the UK have implemented restrictions impacting a broad variety of components of iron and steel. These restrictions went into effect on **September 30, 2023**.\*
- The restrictions require EU and UK importers to have documentation from suppliers to verify that the iron and steel inputs did not originate in Russia.
- Cummins communicated the need for documentation to our supply partners (25<sup>th</sup> August for the EU & 14<sup>th</sup> September for the UK)\*\* , but to date we have received very little documentation. Further communication sent 6<sup>th</sup> October.
- Without this documentation, we are unable to import these items into the EU or UK. This means that containers with any subject parts (that do not have the required documentation from suppliers) will not clear the port, which could ultimately impact our production and / or aftermarket operations.

*\*Although broad in scope, this requirement does not impact finished goods such as engines*

*\*\*Also communicated within both Global and EMEA Supplier Business updates*

# Next Steps

- This is an urgent request for you to provide documentation confirming certain products you supply to Cummins does not contain Russian content.
- Please complete the supplier actions by **15<sup>th</sup> October 2023**
  - After this date, Cummins will recover costs incurred due to detained shipments because of missing / incomplete documents
- This request covers all part numbers you currently supply to Cummins that are classified under the following HS headings:
  - 7206; 7207; 7208; 7209; 7210; 7211; 7212; 7213; 7214; 7215; 7216; 7217; 7218; 7219; 7220; 7221; 7222; 7223; 7224; 7225; 7226; 7227; 7228; 7229; 7301; 7302; 7303; 7304; 7305; 7306; 7307; 7308; 7309; 7310; 7311; 7312; 7313; 7314; 7315; 7316; 7317; 7318; 7319; 7320; 7321; 7322; 7323; 7324; 7325; and 7326.

# Supplier Actions

- 1. Confirm scope:** Confirm which parts, if any, you have supplied to Cummins that fall under the in-scope HS headings
  - If you do not have in-scope parts, send an email to [iron.steel@cummins.com](mailto:iron.steel@cummins.com)
  - If you have in-scope parts, please proceed to step 2
- 2. Perform due diligence:** Carefully review in-scope parts and confirm evidence of the country of origin of the iron and steel inputs used when the parts were manufactured
- 3. Prepare documentation as required by Cummins:** Prepare documentation for Cummins as summarized in [Appendix A](#). Options A and B are both acceptable
- 4. Send documentation to Cummins in both of the following ways:**
  - For all shipments to Cummins (New Process Going Forward): Establish a new process to have your Logistics teams send such documents with each shipment going to Cummins.
  - Email documentation to Cummins (One-time request): You must also send such documents to [iron.steel@cummins.com](mailto:iron.steel@cummins.com) with the following subject format: “SUPPLIER NAME – YYYY-MM-DD - IRON STEEL DILIGENCE”

# Appendix A – Option A

Cummins will accept a signed declaration from an exporter or manufacturer that follows this format:

*Company letterhead*

*Date*

Dear Cummins:

Acting as manufacturer and/or supplier, we

**COMPANY NAME**  
**COMPANY ADDRESS**  
**COMPANY COUNTRY**

hereby confirm, after exercising due diligence, that

- None of the products provided to Cummins Inc. and its affiliates, and
- None of the products or raw materials provided to us by our suppliers to manufacture our products

incorporate any products or raw materials of steel or iron of Russian origin

- As listed in relevant sanctions laws and regulations, such as Annex XVII of EU Council Regulation (EU) 833/2014 (as amended on June 23rd 2023) or the United Kingdom Russia Sanctions (EU Exit) (Amendment) Regulations 2023.

We affirm the due diligence we have conducted has included reviews of one or more of the following: Mill-Test Certificates (MTCs); Invoices from iron and steel sources; Delivery notes from iron and steel sources; Quality certificates of iron and steel inputs; Long-term supplier declarations of iron and steel sourcing; Costing and production documents related to iron and steel inputs; Customs documents of the exporting country of the iron and steel sources; Trade correspondence; Production descriptions; Exclusion clauses in sales contracts; and Manufacturer's statements if they refer directly to the shipment in question (not general statements).

If required by Cummins, we are willing and able to provide evidence of due diligence conducted for all individual articles sold to identify their respective country of origin.

If the facts certified here change, we will notify Cummins immediately.

Sincerely,

Signature  
Name of Authorized Company Official

Supplier Identification

Supplier due diligence confirmation

# Appendix A – Option B

Provide Cummins with direct evidence of the country of origin of the iron and steel used in the manufacture of the items, including:

- Mill Test Certificates (MTCs)
- Long-term supplier declarations of iron and steel sourcing
- Invoices from iron and steel sources
- Delivery notes from iron and steel sources
- Quality certificates of iron and steel inputs
- Costing and production documents related to iron and steel inputs
- Customs documents of the exporting country of the iron and steel sources
- Trade correspondence
- Production descriptions
- Exclusion clauses in sales contracts
- Manufacturer's statements if they refer directly to the shipment in question (not general statements)

▪ **Note: A certificate of non-preferential origin (CoO) is not accepted as evidence**

Q+A



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