

Circumvention to Russia is a crime

Check Russian sanctioned **items** and **entities** on the METI website.

Rules



Items List

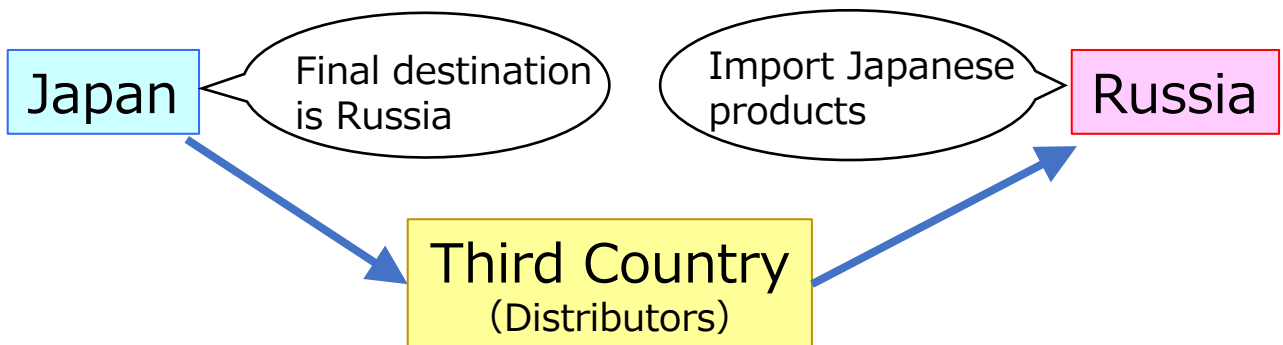
(Export Order Table 2-3)

1	Items on Table 1
1-2	WMD related
2	CW related
2-2	Industrial related
3	luxury

Procedures



There are various risks in circumvention!



Examples of Risks

- Criminal penalties, administrative penalties, warnings
- Press coverage (Damage to company's reputation)
- Relationships with partners and financial institutions
- Investigations, inspections by authority (incl Europe, US)



The US government cautioned individuals and companies outside the US. In some cases, huge fines have been imposed. First, **check your business partners**.

Examples of websites where you can check if a company is subject to sanctions.



【Open sanctions】

【Compliance Notes of the US Government (Excerpt)】

On April 20, 2023, BIS announced (*an omission*) a **\$300 million penalty** against Seagate US of Fremont, California and Seagate Singapore **of Singapore**.

1. Criminal penalties could be imposed if you export sanctioned goods to a third country **knowing that they will be resold to Russia**. (Administrative penalties even for negligence)
2. Before making a transaction, exporters (including subsidiaries and agencies) are encouraged to check the partners using **search site** and **guidelines**.
3. The business may be **exposed to significant risks** in relation to government authorities (including European and US), financial institutions, and business partners.



Contact METI, if you have any concerns.

Contact information

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