Paul Jamieson
Chief Executive Officer & Vice Chairman
Allied Mineral Products, LLC
2700 Scioto Pkwy,
Columbus,
OH 43221

13 July 2026

Dear Mr. Jamieson and the Allied Mineral Products Leadership Team,

We write to you as B4Ukraine, a coalition of Ukrainian and international civil society organisations working to end the financial and material support that sustains Russia's war against Ukraine. Consistent with the UN Guiding Principles on Business and Human Rights (UNGPs), we are requesting a dialogue with you about Allied Mineral Products' ongoing operations in the Russian Federation, and, in particular, its continued operation of its plant in the Alabuga Special Economic Zone.

According to the Kyiv Independent, Allied Mineral Products stated that it is committed to operating ethically and in compliance with all applicable laws and that it has introduced significant compliance measures to keep pace with directives in the United States and other jurisdictions. However, the company did not explain how its continued operations in the Alabuga Special Economic Zone are compatible with applicable U.S. sanctions, nor did it provide further detail on the measures it has taken, stating only that it would continue to monitor the situation.

Alabuga has been widely identified, including by the European Union, the US Department of the Treasury, and investigative reporting, as Russia's principal manufacturing site for Shahed-type ("Geran") long-range attack drones, which Russian forces have used in repeated strikes on Ukrainian civilians and civilian infrastructure, including power facilities, hospitals, and residential buildings. The presence of any Western company's operations in or adjacent to this drone-production environment gives rise to heightened, conflict-related legal and human-rights risks that cannot be treated as ordinary commercial risk.

We consider that continued operation in this environment exposes Allied Mineral Products to serious and converging risks:

Sanctions and legal exposure. As a U.S. company, Allied Mineral Products and its U.S. persons are subject to sanctions administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC). In February 2024, OFAC designated Joint Stock Company Special Economic Zone of Industrial Production Alabuga, the entity that manages the Alabuga Special Economic Zone, under Executive Order 14024. U.S. persons are generally prohibited, unless authorised by OFAC, from engaging in transactions involving the property or interests in property of designated persons, including entities owned 50 percent or more by them. Allied Mineral Products' continued operations in Alabuga therefore raise material questions regarding any payments, leases, utilities, services, contracts or other dealings involving the zone's management company or other sanctioned parties. Violations may result in substantial civil penalties, including on a strict-liability basis, while wilful violations may give rise to criminal liability.

Contribution to Russia's war effort. Taxes, fees, and the goods, services, or know-how generated by operations in the zone may, directly or indirectly, support the Russian state and its military-industrial base.

Mandatory military-support obligations. Russian Federal Law No. 31-FZ requires companies operating in Russia to maintain military registration of employees, assist in serving call-up papers, and make premises, transport, and other resources available to the armed forces, exposing employers to potential complicity in mobilisation.

Heightened human-rights risk (UNGPs). Operating in a conflict-affected, high-risk area triggers a duty of heightened human-rights due diligence to identify, prevent, and mitigate involvement in adverse impacts, and to use all available leverage to stop or reduce harm.

Asset and operational risk. Russia has expropriated, nationalised, or placed under "temporary management" the assets of hundreds of foreign companies; remaining in the market offers no assurance of continued control over local assets, profits, or personnel.

Reputational and investor risk. A continued presence alongside the production of weapons used against civilians carries lasting reputational, commercial, and stakeholder consequences.

Under the UNGPs, engaging constructively with affected stakeholders is itself part of responsible business conduct. We are therefore kindly requesting a dialogue with Allied Mineral Products, which would be a constructive opportunity to set out the facts, demonstrate the due diligence the company has carried out, and give Allied Mineral Products the opportunity to clarify its position. We therefore invite Allied Mineral Products to meet with representatives of the B4Ukraine coalition and our Ukrainian and international member organisations.

To make that dialogue productive, we would be grateful if you would address the following:

1. What heightened human-rights due diligence has Allied Mineral Products conducted, since 24 February 2022, in relation to its Russian operations and their location in or near the Alabuga zone?
2. What payments, leases, service agreements, utility arrangements or other transactions has Allied Mineral Products or any of its subsidiaries had with the Alabuga zone-management company or any other sanctioned or state-linked entity since 23 February 2024?
3. What is the current ownership, governance and operational relationship between Allied Mineral Products in the United States and its Russian business, including any continuing control, financing, intellectual-property licences, technical support, IT access, procurement support or management involvement?
4. What steps has Allied Mineral Products taken to ensure that its facilities, assets, equipment, technology, personnel, or services in Russia have not been used, requisitioned, or made available to support Russian state bodies, military-linked actors, occupation authorities, or the armed forces?

5. Can Allied Mineral Products confirm whether any goods, services, financing, donations, logistics, facility access, or other resources from its Russian operations have been provided, directly or indirectly, to the Russian state or military since 24 February 2022?
6. How has Allied Mineral Products responded to obligations under Russian Federal Law No. 31-FZ regarding military registration and support, and how many employees of its Russian operations have entered military service?
7. What analysis has Allied Mineral Products conducted regarding the designation of Joint Stock Company Special Economic Zone of Industrial Production Alabuga under Executive Order 14024? In particular, has Allied Mineral Products or any of its subsidiaries made payments, entered into contracts, maintained leases, obtained services, or otherwise dealt directly or indirectly with the designated zone-management company, its subsidiaries, or entities owned 50 percent or more by sanctioned persons?
8. Has Allied Mineral Products obtained external legal advice, notified or sought guidance from OFAC or any other competent U.S. authority, or applied for any specific licence? What concrete compliance, ring-fencing, suspension, wind-down or divestment measures has it taken?
9. Where the risks connected to its Russian operations cannot be prevented or effectively mitigated, will Allied Mineral Products commit to a complete and responsible exit from the Russian market in line with the UNGPs?

We would welcome a meeting and ask that you confirm your availability by 27 July 2026. We would also be happy to discuss with Allied Mineral Products the directions for a responsible exit from the Russian market, based on our latest research. Please note that this letter, and any response you provide, may be published on the B4Ukraine website.

We urge Allied Mineral Products to suspend its commercial activities in the Russian Federation and to take concrete steps toward a complete and responsible exit from the Russian market.

Sincerely,
The B4Ukraine Coalition