

Volker Helling
Chief Executive Officer
EFTEC AG
Via Innovativa 1
7013 Domat/Ems
Switzerland

07 July 2026

Dear Mr. Helling and the EMS and EFTEC 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 EFTEC's ongoing operations in the Russian Federation, and, in particular, its continued operations near the Alabuga Special Economic Zone, at an industrial site in Yelabuga.

As you are aware, EFTEC AG operates [production sites in Russia](#), including one in Yelabuga (Elabuga), near the Alabuga Special Economic Zone, and another in Nizhny Novgorod. According to recent investigative reporting by the [Kyiv Independent](#), EFTEC's Russian subsidiary, although not a resident of the zone itself, continues to operate at an industrial site in [Yelabuga](#), alongside what has become Russia's main production hub for Shahed-type long-range attack drones.

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. Moreover, this ongoing conduct is contrary to EMS' own statement on [human rights](#).

We consider that continued operation in this environment exposes EFTEC to serious and converging risks:

Sanctions and legal exposure. As a Swiss company, EFTEC is subject to Switzerland's Russia sanctions regime. On 26 February 2026, Switzerland implemented measures restricting the acquisition and retention of holdings and the establishment or continuation of joint ventures in specified Russian special economic, innovation and preferential zones. Although EFTEC's Yelabuga subsidiary has been reported as not being a formal resident of the Alabuga Special Economic Zone, its precise legal location, any contractual or financial relationships with the zone or its management, and any Swiss, EU or U.S. nexus require careful examination. U.S. designations concerning Alabuga's management create additional exposure where dealings involve designated persons, blocked property or a U.S. jurisdictional nexus. Breaches or

circumvention of applicable sanctions may result in serious civil or criminal liability, depending on the relevant jurisdiction and nexus.

Contribution to Russia's war effort. Taxes, fees, and the goods, services, or know-how generated by EFTEC's Russian operations 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 EFTEC, which would be a constructive opportunity to set out the facts, demonstrate the due diligence the company has carried out, and give EFTEC the opportunity to clarify its position before this correspondence is published or addressed in further public reporting. We therefore invite EFTEC 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 EFTEC conducted, since 24 February 2022, in relation to its Russian operations and their location in or near the Alabuga zone?
2. What steps has EFTEC 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?
3. Can EFTEC 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?
4. How has EFTEC 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?
5. What sanctions analysis has EFTEC conducted regarding Alabuga, and does it consider that any Swiss, EU or US nexus, ownership, financing, contracts, technology, intellectual

property, or management, remains connected to the operation after the relevant sanctions deadlines?

6. Has EFTEC obtained external legal advice, notified competent authorities, applied for any licence or derogation, and what concrete wind-down, ring-fencing, or divestment steps has it taken?
7. Given that EFTEC supplies adhesives, sealants, and coatings to vehicle and truck manufacturers, what end-use due diligence have EFTEC and its parent, EMS-CHEMIE Holding AG, conducted to ensure its Russian-made products are not supplied to manufacturers of military or dual-use vehicles, and what is the company's position on continuing to operate immediately adjacent to the Alabuga drone-production zone?
8. Given the widely reported human rights and international humanitarian law violations committed by Russia in Ukraine, will EFTEC 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 21 July 2026. We would also be happy to discuss with EFTEC 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 EFTEC 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