Andreas Truttenbach
Managing Director
RMA Kehl GmbH & Co. KG
Oststr. 17
77694 Kehl
Germany

07 July 2026

Dear Mr. Truttenbach and the RMA 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 RMA's ongoing operations in the Russian Federation, and, in particular, its continued operation of its plant in the Alabuga Special Economic Zone.

OOO RMA Rus, which RMA's own corporate materials identify as its Russian production site, was established in 2012 in the Alabuga Special Economic Zone to manufacture ball valves for oil and gas pipelines, with declared investments of around US$48.7 million and a planned annual capacity of approximately 11,000 ball valves (in later phases up to DN1400) for the Russian and CIS market. According to recent investigative reporting by the Kyiv Independent, RMA has continued operating in Alabuga throughout Russia's full-scale invasion of Ukraine, and numerous buildings associated with Shahed-drone production have been constructed around the RMA factory since 2022.

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 RMA to serious and converging risks:

Sanctions and legal exposure. As an EU group, RMA is subject to the EU's 19th sanctions package: under Article 5ah of Council Regulation 833/2014, EU operators were required to divest from listed special economic zones, including Alabuga, by 25 January 2026. US measures, including OFAC designations covering the zone's management, create parallel exposure. 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 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 RMA, which would be a constructive opportunity to set out the facts, demonstrate the due diligence the company has carried out, and give RMA the opportunity to clarify its position before this correspondence is published or addressed in further public reporting. We therefore invite RMA 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. Please confirm the current ownership, beneficial ownership, control, management, financing, licensing and other relationships among OOO RMA Rus, CHAS Holding AG, RMA Polska sp. z o.o., RMA Kehl GmbH & Co. KG and the wider RMA group.
2. What heightened human-rights due diligence has RMA conducted, since 24 February 2022, in relation to its Russian operations and their location in or near the Alabuga zone?
3. What steps has RMA 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?
4. Can RMA 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?
5. How has RMA 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?

6. What sanctions analysis has RMA conducted regarding Alabuga, and does it consider that any EU nexus, ownership, financing, contracts, technology, intellectual property, or management, remains connected to the operation after the relevant sanctions deadlines?
7. Has RMA 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?
8. Given that RMA's Russian plant produces equipment for oil and gas pipeline infrastructure, a primary source of the revenue financing Russia's war, what assessment has RMA made of whether its products, spare parts, or services support Russian state-controlled energy infrastructure or military-related end users, and what end-use controls does it apply?
9. Where the risks connected to its Russian operations cannot be prevented or effectively mitigated, will RMA 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 RMA 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 RMA 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