

Harald van Boxtel and Tim Schwencke
Co-Chief Executive Officers
SARIA SE & Co. KG
Norbert-Rethmann-Platz 1
59379 Selm
Germany

07 July 2026

Dear Mr. van Boxtel, Mr. Schwencke, and the SARIA 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 SARIA's ongoing operations in the Russian Federation, and, in particular, its continued operation of its plant in the Alabuga Special Economic Zone.

SARIA SE & Co. KG, part of Germany's RETHMANN Group, operates a plant for the processing of animal by-products in the Alabuga Special Economic Zone, opened in 2013. According to recent investigative reporting by the [Kyiv Independent](#), SARIA's division has continued operating in the Alabuga zone throughout Russia's full-scale invasion of Ukraine, alongside the mass production of 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.

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

Sanctions and legal exposure. As an EU group, SARIA 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 SARIA, which would be a constructive opportunity to set out the facts, demonstrate the due diligence the company has carried out, and give SARIA the opportunity to clarify its position before this correspondence is published or addressed in further public reporting. We therefore invite SARIA 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 SARIA conducted, since 24 February 2022, in relation to its Russian operations and their location in or near the Alabuga zone?
2. What steps has SARIA 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 SARIA 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 SARIA 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 SARIA 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?
6. Has SARIA 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. What due diligence has SARIA conducted to ensure that the fats, proteins, fuels, or other outputs of its Alabuga plant, and any associated logistics or biodiesel supply chains, are not supplied to, or used by, Russian state, energy, or military end users?

8. Where the risks connected to its Russian operations cannot be prevented or effectively mitigated, will SARIA 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 SARIA 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 SARIA 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