

Business & Human Rights Resource Centre

Sent per email at:

kaplina@business-humanrights.org;
skybenko@business-humanrights.org

8 August 2024

Response to the Weekly Update Request

Dear Ms. Kaplina,
Dear Ms. Skybenko,

Thank you for contacting Hottinger Brüel & Kjaer on the 05th of August 2024 with the invitation to respond on the topic in question.

We would like to comment on this as follows:

When the full-scale invasion by the Russian Federation into Ukraine started on the 24th of February 2022, Hottinger Brüel & Kjaer ceased all sales activities in the Russian Federation and the Republic of Belarus. This was officially communicated on our corporate website ([B&K | Sound and Vibration Measurement | Brüel & Kjaer \(bksv.com\)](https://www.bksv.com)) and also to our customers worldwide. Therefore, although the products mentioned in the data portal referenced by you may have been legally sold within Russia before the invasion, there have been no further transactions by Hottinger Brüel & Kjaer since the ban was implemented. This ban remains in place.

We are committed to upholding the highest standards of ethical conduct and compliance with the relevant global regulations, including export control and human rights. Our internal policies, such as our [Code of Business Ethics](#), ensure that we maintain a high level of integrity in all our operations, and regular training is conducted with all relevant staff.

We have a dedicated trade compliance team, who apply our export control due diligence procedures to every sale, and ensure that our procedures are followed across every component of the sales process. Additionally, we seek a [contractual undertaking](#) from our customers to not sell, export or re-export any of our products to the Russian Federation and the Republic of Belarus. Through these rigorous processes, we gain a comprehensive risk-based understanding of our customers and distribution channels, enabling us to identify and prevent any potential diversion attempts. These measures reflect our unwavering dedication to ethical business practices and regulatory compliance.

Please feel free to contact us in case of any further questions.

Yours sincerely,
Hottinger Brüel & Kjaer